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December 8, 1999

SERIAL: BSEP 99-0187

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
USE OF REDUNDANT SAFE SHUTDOWN SYSTEMS UNDER 10 CFR 50, APPENDIX R

Gentlemen:

By letter dated March 26, 1999 (Serial: BSEP 99-0053), Carolina Power & Light (CP&L) Company withdrew a request for an exemption to 10 CFR Part 50, Appendix R for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. CP&L's final resolution of the Thermo-Lag issue at BSEP had been contingent upon approval of this exemption request, which allowed the use of safety-relief valves and low pressure systems as a redundant shutdown system to the Reactor Core Isolation Cooling system. As a result of withdrawing the exemption, CP&L committed to implement modifications to resolve the Thermo-Lag issue at BSEP. Changes requiring a plant outage would be completed during the Unit 1 refueling outage scheduled to begin in February 2000 (i.e., B113R1), and during the Unit 2 refueling outage scheduled to begin in February 2001 (i.e., B215R1). Non-outage portions of the modifications would be implemented within 60 days of completion of each refueling outage, and overall resolution of the Thermo-Lag issue at the BSEP would be achieved within 60 days of completion of the Unit 2 refueling outage.

By letter dated April 12, 1999, from W. Glenn Warren, Chairman of the Boiling Water Reactor Owners' Group (BWROG), to John N. Hannon, Plant Systems Branch Chief, NRC, the BWROG provided its position on the use of the Automatic Depressurization System (ADS) and the Low Pressure Coolant Injection (LPCI) system for post-fire safe shutdown to meet the requirements of 10 CFR 50, Appendix R, Sections III.G.1 and III.G.2. Subsequently, on May 19, 1999, the NRC met with the BWROG Appendix R committee to discuss post-fire safe shutdown circuit analysis issues. In its meeting summary dated June 23, 1999, the NRC stated that, based on a preliminary review, the BWROG position on the use of ADS/LPCI for post-fire safe shutdown has merit.

It is our understanding that, based on the NRC's preliminary review of the BWROG position on the use of ADS/LPCI for post-fire safe shutdown, licensing actions pertaining to this matter have been placed on hold pending a final NRC decision. Therefore, until issuance of the final NRC decision, CP&L is delaying implementation of the BSEP, Unit 1 and Unit 2 modifications cited

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above. Following issuance of the final NRC decision regarding the BWROG position, CP&L will notify the NRC of the actions for BSEP which will be implemented to resolve the Thermo-Lag issue.

Please refer any questions regarding this submittal to Mr. Warren J. Dorman, Supervisor - Licensing, at (910) 457-2068.

Sincerely,



Keith R. Jury
Manager - Regulatory Affairs
Brunswick Steam Electric Plant

WRM/wrm

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