



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 8, 1999

Mr. John S. Keenan, Vice President  
Carolina Power & Light Company  
Brunswick Steam Electric Plant  
Post Office Box 10429  
Southport, North Carolina 28461

**SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 - COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-04, "POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE COATING DEFICIENCIES AND FOREIGN MATERIAL IN CONTAINMENT," DATED JULY 14, 1998 (TAC NOS. MA4024 AND MA4025)**

Dear Mr. Keenan:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility. Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for (a) controlling the procurement of coatings and paints used at the facility; (b) the qualification testing of protective coatings; and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.

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(2) Information demonstrating compliance with item (i) or item (ii).

- (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components during a postulated design basis loss-of-coolant accident, the following information shall be provided to demonstrate compliance:
  - (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
  - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling," and the functional capability of the safety-related containment spray system as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 11, 1998, for the Brunswick Steam Electric Plant, Units 1 and 2. This submittal provided the information requested by GL 98-04. Clarification was provided during a phone call that took place on June 23, 1999. The staff has reviewed your response and has concluded that all requested information has been provided. Therefore, GL 98-04 is closed for your facility.

J. Keenan

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Thank you for your prompt and complete response. If you have any questions regarding this matter, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Allen G. Hansen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Allen G. Hansen, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-325 and 50-324

cc: See next page

**Mr. J. S. Keenan**  
Carolina Power & Light Company

cc:

**Mr. William D. Johnson**  
Vice President and Corporate Secretary  
Carolina Power & Light Company  
Post Office Box 1551  
Raleigh, North Carolina 27602

**Mr. Jerry W. Jones, Chairman**  
Brunswick County Board of Commissioners  
Post Office Box 249  
Bolivia, North Carolina 28422

**Resident Inspector**  
U.S. Nuclear Regulatory Commission  
8470 River Road  
Southport, North Carolina 28461

**Mr. John H. O'Neill, Jr.**  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, NW.  
Washington, DC 20037-1128

**Mr. Mel Fry, Director**  
Division of Radiation Protection  
N.C. Department of Environment  
and Natural Resources  
3825 Barrett Dr.  
Raleigh, North Carolina 27609-7721

**Mr. J. J. Lyash**  
Plant Manager  
Carolina Power & Light Company  
Brunswick Steam Electric Plant  
Post Office Box 10429  
Southport, North Carolina 28461

**Public Service Commission**  
State of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

**Brunswick Steam Electric Plant**  
Units 1 and 2

**Ms. Karen E. Long**  
Assistant Attorney General  
State of North Carolina  
Post Office Box 629  
Raleigh, North Carolina 27602

**Mr. Robert P. Gruber**  
Executive Director  
Public Staff - NCUC  
Post Office Box 29520  
Raleigh, North Carolina 27626-0520

**Director**  
Site Operations  
Brunswick Steam Electric Plant  
Post Office Box 10429  
Southport, North Carolina 28461

**Mr. William H. Crowe, Mayor**  
City of Southport  
201 East Moore Street  
Southport, North Carolina 28461

**Mr. Dan E. Summers**  
Emergency Management Coordinator  
New Hanover County Department of  
Emergency Management  
Post Office Box 1525  
Wilmington, North Carolina 28402

**Mr. Terry C. Morton**  
Manager  
Performance Evaluation and  
Regulatory Affairs CPB 7  
Carolina Power & Light Company  
Post Office Box 1551  
Raleigh, North Carolina 27602-1551

**Mr. K. R. Jury**  
Manager - Regulatory Affairs  
Carolina Power & Light Company  
Post Office Box 10429  
Southport, NC 28461-0429

J. Keenan

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December 8, 1999

Thank you for your prompt and complete response. If you have any questions regarding this matter, please contact me.

Sincerely,

Original signed by:

Allen G. Hansen, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-325 and 50-324

cc: See next page

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