



Carolina Power & Light Company

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SERIAL: BSEP 99-0177

U. S. Nuclear Regulatory Commission
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BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 1
DOCKET NO. 50-325/LICENSE NO. DPR-71
DEFERMENT OF GENERIC LETTER 88-01 INSPECTIONS OF WELD OVERLAYS

Gentlemen:

On January 25, 1988, the NRC issued Generic Letter 88-01, "NRC Position on IGSCC In BWR Austenitic Stainless Steel Piping." Generic Letter 88-01 specifies that boiling water reactor (BWR) licensees must have an inservice inspection program for austenitic stainless steel piping that conforms to the NRC positions on inspection schedules, methods, personnel, and sample expansion delineated in the generic letter. NUREG-0313, Revision 2, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping," dated January 1988, details the technical bases for the NRC positions.

By letter dated June 17, 1999, the NRC accepted a proposal by the Boiling Water Reactor Owners' Group (BWROG) for deferring weld overlay inspections which are specified by Generic Letter 88-01 and NUREG-0313, Revision 2. The BWROG requested the NRC "... allow the BWR plants identified below to defer weld overlay examinations until March 2001, or until the completion of the NRC staff review and approval of the proposed generic report, whichever comes first." Carolina Power & Light (CP&L) Company's Brunswick Steam Electric Plant (BSEP), Units 1 and 2 were identified in the list of applicable plants. Based on the NRC's acceptance of the BWROG proposal, CP&L is deferring examination of certain weld overlays from BSEP, Unit 1 Refueling Outage 12 (i.e., B113R1), which is scheduled to begin on February 26, 2000, until Unit 1 Refueling Outage 13 (i.e., B114R1), which is scheduled to begin March 2001.

The June 17, 1999, NRC letter stated that each licensee deferring inspections of weld overlays should (1) inform the NRC prior to 30 days to the start of a refueling outage, (2) confirm that the BWROG acceptance criteria are met, (3) enumerate which weld overlays will not be inspected, and (4) confirm the inspection history in the BWROG letter dated March 5, 1999 (i.e., "BWR Owners Group Program on Weld Overlay Inspection Relief, BWR Project Number 691," BWROG-99024), is accurate and current or provide updated information.

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CP&L has reviewed each of the conditions established by the NRC for deferral of weld overlay examinations. BSEP, Unit 1 compliance with each of these conditions is discussed below.

Criterion 1: Notification

The purpose of this letter is to notify the NRC of deferral of three Generic Letter 88-01 related inspections of weld overlays for BSEP, Unit 1. Refueling Outage 12 (i.e., B113R1) for BSEP, Unit 1 is scheduled to begin on February 26, 2000.

Criterion 2: Acceptance Criteria Met

The NRC's letter dated June 17, 1999, accepted several criteria proposed by the BWROG. BSEP, Unit 1 compliance with each criterion is discussed below.

EPRI Water Chemistry Guidelines

BSEP, Unit 1 is being operated in compliance with the EPRI water chemistry guidelines. The EPRI water chemistry guidelines for cold shutdown, startup, and hot shutdown have not been exceeded. BSEP, Unit 1 is classified as a moderate water chemistry plant with hydrogen injection at the low end of the moderate range

Overlay Design

The three weld overlays for which inspections are being deferred are full structural overlays that meet the requirements of the American Society of Mechanical Engineers (ASME) Code, Section XI, Code Case N-504.

Overlay Inspections

The weld overlays for which inspections are being deferred have been inspected at least two times without intergranular stress corrosion cracking (IGSCC) indications in the overlay. Specifically:

- Weld 1B32RECIRC-28-B-4 was post-overlay inspected in 1985, and was subsequently inspected in 1987, 1990, and 1996. No growth of IGSCC into the overlay has been detected.
- Weld 1B32RECIRC-28-B-8 was post-overlay inspected in 1985, and was subsequently inspected in 1987, 1988, 1993, and 1996. No growth of IGSCC into the overlay has been detected.
- Weld 1B32RECIRC-4-B-10 was post-overlay inspected in 1987, and was subsequently inspected in 1988, 1993, and 1996. No growth of IGSCC into the overlay has been detected.

Criterion 3: Deferral Scope

CP&L is deferring inspection of the following weld overlays from BSEP, Unit 1 Refueling Outage 12 to Refueling Outage 13:

1B32RECIRC-28-B-4
1B32RECIRC-28-B-8
1B32RECIRC-4-B-10

Criterion 4: Inspection History

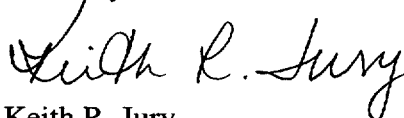
The inspection information for BSEP, Unit 1 cited in the March 5, 1999, BWROG letter is accurate and current.

Summary

Based on demonstrated compliance with the conditions in the NRC's letter dated June 17, 1999, CP&L is deferring the identified weld overlay examinations from BSEP, Unit 1 Refueling Outage 12, which is scheduled to begin on February 26, 2000, to Refueling Outage 13, which is scheduled to begin March 2001.

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

Sincerely,



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WRM/wrm

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