



Carolina Power & Light Company
P.O. Box 10429
Southport, NC 28461-0429

January 9, 2001

SERIAL: BSEP 01-0010

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
REQUEST FOR APPROVAL OF RELIEF REQUEST FOR THE THIRD 10-YEAR
INSERVICE INSPECTION PROGRAM – RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION

Gentlemen:

By letter dated October 12, 2000 (Serial: BSEP 00-0089), as supplemented December 18, 2000 (Serial: BSEP 00-0176), Carolina Power & Light (CP&L) Company requested relief from the requirements of the 1989 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. As an alternative to the requirements of the ASME Code, Section XI, CP&L has proposed to verify the structural integrity of portions of the Containment Atmosphere Control (CAC) system and the entire Standby Gas Treatment (SGT) system through structural integrity walkdowns performed by plant personnel.

In response to a telephone discussion with the NRC on December 27, 2000, regarding the basis for the proposed alternative, the NRC requested that CP&L state whether the piping addressed by the alternative is insulated and/or painted. The accessible piping within the Reactor Building is not insulated and is painted. The absence of insulation on the accessible piping ensures that the surface of the piping is not obstructed during the structural integrity walkdowns. In addition, because the piping is painted, leakage or structural distress will be evident through stains observable on the exterior painted surface, or through distressed (i.e., bubbled or flaked) paint on the pipe exterior. Thus, a structural integrity walkdown will be able to locate evidence of leakage.

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Please refer any questions regarding this submittal to Mr. Leonard R. Beller, Supervisor - Licensing, at (910) 457-2073.

Sincerely,



David C. DiCello
Manager - Regulatory Affairs
Brunswick Steam Electric Plant

WRM/wrm

cc: U. S. Nuclear Regulatory Commission, Region II
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