



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

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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  
THIRD 10-YEAR INSERVICE INSPECTION PROGRAM – ADOPTION OF BWRVIP-75

Gentlemen:

The purpose of this letter is to notify the NRC that Carolina Power & Light (CP&L) Company is adopting the guidance contained in the Electric Power Research Institute (EPRI) proprietary report TR-113932, "BWR Vessel and Internals Project, Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules (BWRVIP-75)," dated October 1999, for weld examination sample determination and scope expansion criteria, for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2.

By letter dated October 27, 1999, the BWRVIP-75 report was submitted to the NRC for review. A non-proprietary version of the BWRVIP-75 report was submitted by letter dated February 29, 2000. The BWRVIP-75 report proposed revisions to the extent and frequencies of piping inspections contained in Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," dated January 25, 1988, and NUREG-0313, Revision 2, "Technical Report on Material Selection and Process Guidelines for BWR Coolant Pressure Boundary Piping," dated January 1988. The revisions were based on the consideration of inspection results and service experience gained by the industry since the issuance of Generic Letter 88-01, and included additional information regarding the benefits of improved BWR water chemistry. The BWRVIP-75 report also provided justification for the proposed inspection criteria for Category A through E welds for the normal water chemistry (NWC) and hydrogen water chemistry (HWC) conditions.

By letter dated September 15, 2000, the NRC issued its Safety Evaluation and concluded that, with the exception of the open items discussed in the Safety Evaluation, the as-reviewed BWRVIP-75 guidance is acceptable for licensees to use in lieu of their commitments to Generic Letter 88-01 and NUREG-0313, Revision 2. The conclusions in the NRC's BWRVIP-75 Safety Evaluation are not applicable to any welds or piping (e.g., socket welds, carbon steel piping, etc.) other than those within the original scope of Generic Letter 88-01 and NUREG-0313, Revision 2 (e.g., those in boiling water reactor piping made of austenitic stainless steel, four

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inches or larger in nominal diameter, and exposed to reactor coolant at a temperature above 200°F during power operation; and to reactor pressure vessel attachments and appurtenances).

The NRC Safety Evaluation dated September 15, 2000, identifies nine open items which describe exceptions the NRC has taken with the BWRVIP-75 guidance. Several of these open items relate to the requirements for crediting HWC for further reduction of required inspections.

Pending resolution of these open items by the BWRVIP, CP&L plans to use the inspection frequencies and scopes for NWC conditions, as described in the BWRVIP-75 guidance and modified by the NRC's September 15, 2000, Safety Evaluation. CP&L will use this guidance beginning with the BSEP, Unit 2 refueling outage scheduled to start on February 24, 2001. CP&L reserves the option to, at a future date, adopt the BWRVIP-75 inspection frequencies and scope based on credit for HWC. In order to efficiently coordinate implementation of the BWRVIP-75 guidance with existing 10-year Inservice Inspection (ISI) Program activities, CP&L plans to implement the BWRVIP-75 surveillance frequencies using the date that the current 10-year ISI interval began. The current 10-year ISI interval began May 10, 1998.

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

Enclosure: List of Regulatory Commitments

cc: U. S. Nuclear Regulatory Commission, Region II  
ATTN: Mr. Luis A. Reyes, Regional Administrator  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, GA 30303-8931

U. S. Nuclear Regulatory Commission  
ATTN: Mr. Theodore A. Easlick, NRC Senior Resident Inspector  
8470 River Road  
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission  
ATTN: Mr. Donnie J. Ashley (Mail Stop OWFN 8G9)  
11555 Rockville Pike  
Rockville, MD 20852-2738

Ms. Jo A. Sanford  
Chair - North Carolina Utilities Commission  
P.O. Box 29510  
Raleigh, NC 27626-0510

Division of Boiler and Pressure Vessel  
North Carolina Department of Labor  
ATTN: Mr. Jack Given, Assistant Director of Boiler & Pressure Vessels  
4 West Edenton Street  
Raleigh, NC 27601-1092

ENCLOSURE

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THIRD 10-YEAR INSERVICE INSPECTION PROGRAM – ADOPTION OF BWRVIP-75

List of Regulatory Commitments

The following table identifies those actions committed to by Carolina Power & Light (CP&L) Company in this document. Any other actions discussed in the submittal represent intended or planned actions by CP&L. They are described for the NRC's information and are not regulatory commitments. Please notify the Manager - Regulatory Affairs at the Brunswick Steam Electric Plant (BSEP) of any questions regarding this document or any associated regulatory commitments.

| Commitment   | Committed date or outage   |
|--|--|
| 1. The inspection frequency and scope of Category A, B, C, D, and E stainless steel piping welds will be in accordance with the BWRVIP-75 guidelines for normal water chemistry (NWC), as revised by the NRC Safety Evaluation dated September 15, 2000. | Beginning with the BSEP, Unit 2 refueling outage scheduled to start February 24, 2001. |