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SUBJECT: Discusses plans fo performing limited number of Safety Sys
 Functional Insp at Units 2 & 3 at Brunswick Electric Plant &
 Unit 2 at Robinson Steam Plant.

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Carolina Power & Light Company

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G. E. VAUGHN
Vice President
Nuclear Services Department

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NOS. 50-261/LICENSE NO. DPR-23
SAFETY SYSTEM FUNCTIONAL INSPECTIONS

Gentlemen:

Through prior communications with the Nuclear Regulatory Commission, Carolina Power & Light Company (CP&L) has informed the NRC of the Company's plans for performing a limited number of Safety System Functional Inspections (SSFIs) at the Brunswick Steam Electric Plant, Units 1 and 2 and the H. B. Robinson Steam Electric Plant, Unit 2. To date, CP&L has completed SSFIs on the service water system, high pressure coolant injection system, and standby liquid control system for the Brunswick Steam Electric Plant, and on the auxiliary feedwater system, safety injection system, and the nuclear instrumentation system (an SSFI-type inspection using INPO Operational Readiness Evaluation guidelines) for the H. B. Robinson Steam Electric Plant. Results from these assessments have been used to identify potential generic design issues, trends, and patterns and to correct specific deficiencies.

The Company is currently performing a design basis reconstitution at the Brunswick and H. B. Robinson Plants. Field validation of the Design Basis Documents is performed as an integral part of these projects. Based on the experience gained to date in performing SSFIs, the Company has determined that an SSFI, if needed, is more effective after the design basis documentation field validation is completed. This is also consistent with NSAC-121 guidance on SSFIs.

Based on the above, the Company has elected to postpone the performance of further SSFIs at the Brunswick and H. B. Robinson Plants until the design basis reconstitution effort, including the field validation process, is completed. At that time, the Company will evaluate the results of the design basis documentation validations and design reviews and, on a system-by-system basis, assess the benefits of performing additional SSFIs.

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Please refer any questions regarding this submittal to Mr. S. D. Floyd at (919) 546-6901.

Yours very truly,

A handwritten signature in cursive script, appearing to read "G. E. Vaughn".

G. E. Vaughn

WRM/wrm (\wp\ssfi-v2.wpf)

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