



Carolina Power & Light Company

February 28, 1983

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Serial: LAP-83-40

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
DRAFT SER ON APPENDIX R EXEMPTION REQUEST

Dear Mr. Eisenhut:

Carolina Power & Light Company (CP&L) has reviewed the Brunswick Steam Electric Plant (BSEP) Appendix R Exemption Request Draft Safety Evaluation Report (SER) issued January 31, 1983. Our review indicates that eight (8) exemption requests will be granted, twenty-six (26) are proposed to be denied and forty-four (44) remain undecided and that the NRC Staff will "report on these (44) exemptions in a subsequent safety evaluation". In a working level meeting with the Staff on February 9, 1983, at which we presented clarifying information in defense of the need for the forty-four (44) undecided exemption requests, it was determined that the Staff would require additional clarifying material and that CP&L would provide such material. Carolina Power & Light Company embarked on a program to supply this additional information. On February 17, 1983, your Staff telephoned to inform us that the forty-four (44) undecided exemption requests were being denied and that any further exchange of information would have to be handled through the formal appeal process.

Carolina Power & Light Company is firmly convinced, however, that most, if not all, of the issues relating to the 44 unresolved and 26 preliminarily denied exemption requests can be resolved through working level meetings. It is our intent to provide clarifying information requested by the Staff, including the combustible loading in each zone associated with cable coating. Also, as a result of the last working level meeting we are reevaluating certain of the forty-four (44) undecided exemption requests for possible withdrawal. We will transmit the results of this reevaluation in about four weeks.

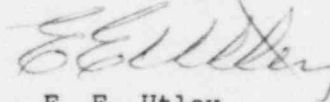
8303090358 830228  
PDR ADCK 05000324  
F PDR

Pool

One item not discussed in the Draft SER is CP&L's proposed schedule for installation of modifications set forth on page 3 of our June 30, 1982 submittal. We would appreciate the NRC's approval of this schedule prior to issuance of the final SER.

In conclusion, CP&L believes that working level meetings are highly productive for both CP&L and NRC, and we sincerely request that you keep this avenue open to us. In any event, prior to the denial of any fire protection exemption requests on our docket, CP&L hereby requests an appeal meeting in accordance with your letter of January 31, 1983. If you have any questions, please feel free to contact me.

Yours very truly,



E. E. Utley  
Executive Vice President  
Power Supply and  
Engineering & Construction

GSC/ce (6285SNP)

cc: Mr. D. O. Myers (NRC-BSEP)  
Mr. J. P. O'Reilly (NRC-RII)  
Mr. S. D. MacKay (NRC)  
Mr. D. H. Vassallo (NRC)  
Mr. R. H. Vollmer (NRC)