



Carolina Power & Light Company

SERIAL: NLS-84-147

April 2, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
IGSCC INSPECTIONS

Dear Mr. Denton:

In conversations with your staff, Carolina Power & Light Company (CP&L) was requested to provide additional justification for continued operation until November 1984 for Brunswick Steam Electric Plant (BSEP) Unit No. 1. In response to your request, CP&L hereby submits for your review an evaluation performed by NUTECH Engineers entitled "Statistical Evaluation of Postulated Flaws at Brunswick Steam Electric Plant". The results of the above evaluation along with the inspections and repairs that have been performed and the interim measures that have been taken (CP&L Letter NLS-84-045, dated January 31, 1984) provide the basis for continued operation until November 1984.

In addition to the above, CP&L commits to the following inspection plan for any forced outages that may occur between now and November, 1984:

1. If an unscheduled outage occurs, CP&L will estimate the Unit downtime based on the cause of the shutdown.
2. If the downtime will exceed ten days, CP&L commits to ultrasonically inspect three welds susceptible to IGSCC. These welds will be chosen from the sample that was provided to the NRC on January 31, 1984. If the initial outage duration is estimated to be less than or equal to ten days but is subsequently extended, the inspections will be performed if at any time the estimated remaining duration exceeds ten days. If any of the joints inspected contain IGSCC indications that require repair, an additional three weld joints will be inspected.

Carolina Power & Light Company has and will continue to maintain a very conservative approach to the resolution of the IGSCC issue.

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Mr. H. R. Denton

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With this thought in mind, CP&L believes that based on 1) inspections made to date on the BSEP units, 2) the relative age of the plants, 3) industry experience and research on the generation and growth of IGSCC, 4) interim measures taken to enhance leak-detection capability, 5) the study performed by NUTECH which demonstrates a very low probability that unacceptable flaws exist in the susceptible piping, and 6) the additional inspections committed to above, the continued operation of BSEP Unit 1 until November 1984 will not endanger the health and safety of the public.

Should you have any questions concerning this letter, do not hesitate to contact a member of our Licensing Staff.

Yours very truly,



P. W. Howe

Vice President

Brunswick Nuclear Project

PPC/gvc (9794PPC)

Enclosures

cc: Mr. D. O. Myers (NRC-BSEP)
Mr. J. P. O'Reilly (NRC-RII)
Mr. M. Grotenhuis (NRC)

