CP&L
A Progress Energy Company

October 16, 2001

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TSC-1999-05

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
STANDBY GAS TREATMENT SYSTEM – CHARCOAL TESTING REQUIREMENTS
(NRC TAC NOS. MA7255 AND MA7256)

Ladies and Gentlemen:

On May 16, 2000, the NRC issued Amendments 209 and 237 to the facility operating licenses for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2, respectively. The amendments revised Technical Specification (TS) 5.5.7.c.1, "Ventilation Filter Testing," to be consistent with the guidance in Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal." Amendments 209 and 237 were issued in response to Carolina Power & Light (CP&L) Company's November 23, 1999, submittal (Serial: BSEP 99-0182). The purpose of this letter is to document a discrepancy, found during a recent self-assessment of the BSEP filter testing program, in the Technical Evaluation Report (TER) which supports the NRC Safety Evaluation (SE) for Amendments 209 and 237.

Generic Letter 99-02 requested licensees to revise their technical specifications to require that laboratory testing of charcoal be performed in accordance with American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon." CP&L's November 23, 1999, submittal revised the Standby Gas Treatment (SGT) system testing requirements to reference ASTM D3803-1989. The pre-existing, the proposed, and the version of TS 5.5.7.c.1 issued in Amendments 209 and 237 require that the SGT system charcoal meet an acceptance criteria of $< 0.5\%$ penetration of methyl iodide when tested at a relative humidity $\geq 70\%$. However, the TER provided with the NRC's SE, incorrectly states SGT system testing is performed at a relative humidity of 95%. This mis-statement can be found in Section 3.1 and Table 2 of the TER.

The BSEP SGT system includes heaters, located in the trains' flow streams, which control humidity to 70% or less. ASTM D3803-1989 allows testing at a relative humidity of 70% when it is controlled in a manner such as this. Neither the revised TSs or the justification provided in CP&L's November 23, 1999, submittal revised the pre-existing 70% relative humidity test criteria. Therefore, CP&L believes that the TER reference to testing at a

Brunswick Nuclear Plant
P.O. Box 10429
Southport, NC 28461

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relative humidity of 95% was an administrative error and was not a critical factor in the SE supporting issuance of Amendments 209 and 237.

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

Sincerely,

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

MAT/mat

cc: U. S. Nuclear Regulatory Commission, Region II
ATTN: Dr. Bruce S. Mallett, 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

Mr. Mel Fry
Director - Division of Radiation Protection
North Carolina Department of Environment and Natural Resources
3825 Barrett Drive
Raleigh, NC 27609-7221