

November 20, 1979

FILE: NG-3514(B)

SERIAL: GD-79-3000

Office of Nuclear Reactor Regulation
ATTENTION: Mr. Harold R. Denton, Director
United States Nuclear Regulatory Commission
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
DISCUSSION OF LESSONS LEARNED SHORT TERM REQUIREMENTS

Dear Mr. Denton:

In your letter of October 30, 1979, to all operating nuclear power plants, you provided clarifications of the "short term" requirements addressed in Mr. D. G. Eisenhower's letter of September 13, 1979. You also requested that within 15 days of receipt of your letter we identify any disagreements with the staff requirements and provide revised schedules for any items that we had previously identified as not meeting the established implementation dates. In response to this request, we have conducted a review of the items associated with our Brunswick Steam Electric Plant, Unit Nos. 1 and 2. We were aided in this effort by a telephone conversation with members of your staff on November 8, in which certain schedule and implementation problems were discussed.

The results of our review are presented in the following discussions on an item by item basis, where necessary. For most of the items, our proposed methods for resolving the items are in accord with the requirements you have provided to us; this does not imply, however, that we necessarily agree with all your requirements. Those items with which we disagree or which remain unresolved between the staff and the BWR Owners' Group are addressed below.

On Friday, November 16, we received a letter from Mr. D. G. Eisenhower to Mr. T. D. Keenan, Chairman of the BWR Owners' Group. In this letter, dated November 14, Mr. Eisenhower identified five positions taken by the Owners' Group that are not acceptable, in whole or in part, to the staff. In our letter of October 18 to Mr. Eisenhower, we endorsed three of the Owners' Group positions; Item 2.1.2 - Safety and Relief Valve Testing, Item 2.1.3.a - Valve Position Indication and Item 2.1.4 - Containment Isolation. Of these three, the problem cited with respect to Item 2.1.3.a - Valve Position Indication does not apply to the Brunswick Units.

Regarding Item 2.1.2 - Safety and Relief Valve Testing, representatives of the Owners' Group have been attempting to contact your staff regarding alternatives that might provide acceptable resolution to this issue. These attempts have been only partially successful and have resulted in conflicting information being provided to the Owners' Group such that revision of the position taken by the Utility Owners could not be performed prior to the due date of this letter. The Owners' Group is continuing to

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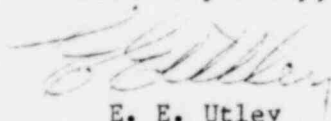
attempt to resolve this issue, but Carolina Power & Light Company is concerned that changing criteria by the staff may jeopardize our capability to successfully implement the portion of this item required by January 1, 1980. We request that you ensure the best uniformity of position possible on all of the implementation items such that these types of problems can be minimized.

Regarding Item 2.1.4 - Containment Isolation, we are studying means of improving implementation of logic changes to meet the date of January 1, 1980, that you desire. One of the problems that exists with making these logic changes is the complexity of the electronics systems involved. In addition, the redesignation of systems as nonessential when the original plant design called for them to be operable following reset of a containment isolation signal may induce a number of logic changes; thereby, adding to the work required to be performed over the next six weeks. Our investigations are continuing in this area, and it is too early to determine the number of logic changes required or whether they can be implemented by January 1, 1980. We will investigate alternative measures to logic changes and implement those measures if the changes cannot be effected by the required date. We will inform you if this item results in a major implementation problem.

The other items discussed in the telephone conversation referenced earlier, as well as the ones discussed above, will be addressed in a submittal which will be provided to you by December 31, 1979. This submittal will address each item required for implementation by January 1, 1980, and spell out in detail how compliance with the item has been accomplished or provide justification for any item which could not be completed due to unforeseen circumstances.

We trust this information is suitable for your use.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply & Customer Services

cc: Mr. J. N. Hannon (NRC)

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