



Carolina Power & Light Company

May 21, 1981

FILE: NG-3514(B)

Serial No.: NO-81-909

Office of Nuclear Reactor Regulation
ATTENTION: Mr. T. A. Ippolito, Chief
Operating Reactors Branch No. 2
United States Nuclear Regulatory Commission
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT
HYDRAULIC SNUBBER SURVEILLANCE

Dear Mr. Ippolito:

Summary

In accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications for its Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2. These changes revise the surveillance requirements for hydraulic snubbers as requested by Mr. Eisenhower's letter of November 20, 1980. The proposed specifications have been changed to reflect the specific characteristics of the Brunswick Plant and to incorporate several technical points which are discussed below.

Discussion

Several changes of both an editorial and technical nature have been made to the proposed specifications. These changes and the reasons for them are discussed below.

The surveillance requirements for mechanical snubbers have been deleted since the Brunswick Plant does not use this type of snubber. Appropriate specifications will be developed and submitted if mechanical snubbers are ever to be installed in safety-related systems at the Brunswick Plant.

Your original proposed specification required that a value of "c" be chosen and incorporated into the specifications. However, the statistical sampling criteria are fully met and flexibility is maintained if "c" remains a variable. Therefore, we propose to choose a value of "c" prior to the initiation of each set of functional tests. This proposal will also eliminate unnecessary administrative technical specification changes if the plant wishes to revise the value chosen.

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Mr. Ippolito

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The requirement to choose at least 25% of the snubbers in the representative sample from the three categories listed in Section 4.7.9.c of the proposed specification has been deleted as being overly conservative. The increased sampling requirements and the requirement to include the various configurations, operating environments and the range of size and capacity of snubbers will ensure that snubbers from those categories will be included and at an increased frequency than has previously been accomplished.

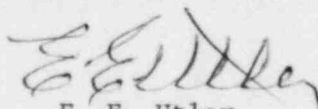
The requirement to retest snubbers which failed the previous functional test has also been deleted. Each failed snubber is fully repaired and an engineering evaluation of the cause of failure is performed to identify the cause of the failure. If environmental or service conditions factors are identified as the cause of failure, then the snubbers would be scheduled for additional surveillance by the plant staff; but if the cause is not related to these causes, no significant benefits are to be gained by the additional testing. Therefore, we believe that the accrued benefits do not justify the additional administrative and testing burden of this specific requirement.

Administrative Information

Enclosed you will find the revised Technical Specifications pages with the changes indicated by vertical lines in the right-hand margins. We believe that these requests involve a single technical issue and thus constitute one Class I amendment and one Class III amendment in accordance with 10CFR170.22. Since this request is the result of a written Commission request to clarify technical specifications for the convenience of the Commission and has only minor safety significance, no amendment application fee is being remitted. This is in accordance with footnote 2 to 10CFR170.22.

Should you have any questions regarding this matter, please contact my staff.

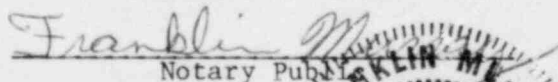
Yours very truly,



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

RMP/dk (N#57)
Enclosures

Sworn to and subscribed before me this 21st day of May, 1981.


Notary Public

My commission expires: October 4, 1981

