CP&L
Carolina Power & Light Company

June 30, 1981

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

BRUNSWICK STEAM ELECTRIC PLANT UNIT NO. 1
DOCKET NO. 50-325
LICENSE NO. DPR-71
IMPLEMENTATION OF ODYN CODE

Dear Mr. Ippolito:

SUMMARY

Mr. D. G. Eisenhut's November 4, 1980 letter stated that after January, 1982, all operating BWRs with General Electric (GE) reload licensing analyses must have the limiting transients recalculated with the ODYN transient code, even if no reload submittal has been made. The reload application for Brunswick Unit No. 1 for the current cycle has previously been submitted to and approved by the NRC using the REDY transient model. This unit started up in the current cycle in mid-1980 and is presently scheduled for refueling in April, 1982. In order to satisfy the stipulations in NRC's November 4, 1980 letter, Carolina Power & Light Company (CP&L) would be required to have GE reanalyze the limiting transients for the current operating cycle for Brunswick-1, using ODYN, by January, 1982. These reanalyses, if performed, would be applicable to only the final three months of the current operating cycle, and they would represent redundant analyses since the unit has already been licensed under the REDY code.

DISCUSSION

General Electric has presented evidence that demonstrates the existing licensing application of the REDY transient model is conservative and that its continued use during an orderly transition to ODYN is appropriate. As demonstrated in the ODYN/REDY comparisons listed below, overall plant operating limits determined using REDY are expected to be either unaffected or improved under ODYN analyses.

1. Letter, R. H. Buchholz (GE) to Paul S. Check (NRC), "Response to NRC Request for Information on ODYN Computer Model," September 5, 1980.

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2. Letter, E. D. Fuller to D. F. Ross, "Impact of ODYN Transient Model on Plant Operating Limits," June 26, 1978.

These comparisons served as an acceptable basis for continued licensing approvals with the REDY model from 1977 through January, 1982, while the ODYN model was under review and prior to its required implementation. These factors lead CP&L to conclude that continued operation of Brunswick-1 to the end of the current cycle using REDY poses no risk to public safety and that there is no benefit to the public in performing a redundant ODYN analysis for the few remaining months of operation in the current cycle. The conservatisms in the REDY licensing basis make this unnecessary, and the impact of these retrofit analyses on the reload schedules, as well as on other analyses activities, would be severe.

CONCLUSION

For the reasons discussed above, CP&L plans to complete the current operating cycle of Brunswick-1 without performing reanalyses of limiting transients using ODYN. Subsequent analyses will be performed utilizing the ODYN code. Please advise us if you do not concur with this plan.

Please contact my staff should you have any questions concerning this information.

Yours very truly,

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

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