



Carolina Power & Light Company

July 7, 1981



File: NG-3514(B)

Serial No.: NO-81-1176

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 NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT
IMPLEMENTATION OF NUREG-0313, REVISION 1

Dear Mr. Ippolito:

SUMMARY

This is in response to NRC's February 26, 1981 letter from Mr. D. G. Eisenhut which transmitted NUREG-0313, Revision 1 "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping" (Generic Activity A-42). For the Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2, Carolina Power & Light Company (CP&L) was asked to identify nonconforming piping and provide a schedule for the replacement of "service sensitive" nonconforming piping. In addition, we were requested to propose appropriate technical specifications changes for surveillance and operational leakage. This letter provides CP&L's response to each of these issues.

NONCONFORMING MATERIALS IDENTIFICATION

The Brunswick plant has no nonconforming ASME Code Class 2 or 3 coolant pressure boundary piping. The Class 1 lines which are currently considered to be nonconforming and service sensitive nonconforming are shown below for both units.

8107130359 810707
PDR ADOCK 05000324
P PDR

*Appl
S/H*

Nonconforming, Non-Service Sensitive

- 28 inch recirculation suction lines
- 28 inch recirculation discharge lines
- 22 inch recirculation header
 - 6 inch reactor water cleanup suction lines
 - 4 inch reactor water cleanup discharge lines from valve F042 to valve F039

Nonconforming, Service Sensitive

- 12 inch recirculation risers
- 20 inch RHR suction line to valve F067
 - 3 inch control rod drive return lines from nozzle to valve F087

SCHEDULE DATA

CP&L has had an augmented inspection program on all of the lines above for several years as committed to in our letter to Mr. A. Schwencer of December 20, 1977. Since that time, at least 10% of the welds on each of the nonconforming, non-service sensitive lines and on the 12-inch recirculation risers has been inspected with no significant indications found. Commencing with the date of this letter, the 12-inch recirculation risers have been reclassified as nonconforming, service-sensitive lines and will be inspected as required by the NUREG. 100% of the welds on the other nonconforming, service sensitive lines have been inspected twice, also with no significant indications found. Based on this record, and our belief that cracking on these lines is a reliability rather than a safety issue, as indicated in our previous comments on this document which have not yet been addressed on a technical basis by your staff, no firm schedule for replacement will be provided at this time. Instead we reiterate our 1977 commitment to continue to provide augmented inspection programs for these lines and that we will replace or repair the affected lines if cracking is found during these inspections.

TECHNICAL SPECIFICATIONS

As requested by Mr. Eisenhower's letter and in accordance with the Code of Federal Regulations, Title 10, Section 50.90 and Section 2.101, CP&L hereby requests revisions to the technical specifications for its Brunswick Plant, Unit Nos. 1 and 2. These changes add a reference to NUREG-0313, Revision 1, and an additional reactor coolant system leakage LCO.

The changes are shown on the attached pages by a vertical bar in the right hand margin. A very similar technical specification change request for system leakage criterion was submitted by CP&L at your request on December 20, 1977, and no action has been taken by the NRC. Since this earlier request remains outstanding, we do not believe that a license amendment fee is required.

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

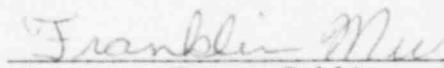
Yours very truly,



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

CSB/JM/lr (6689)
Attachments

Sworn to and subscribed before me this 7th day of July, 1981


Notary Public

My commission expires October 24, 1981

