



Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

MAR 18 1991

SERIAL: NLS-91-066
10CFR50.90
91TSB01

G. E. VAUGHN
Vice President
Nuclear Services Department

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-324/LICENSE NO. DPR-62
REQUEST FOR LICENSE AMENDMENT
ONE-TIME EXTENSION OF DIESEL GENERATOR SURVEILLANCE INTERVAL

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company hereby requests a revision to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit 2.

Technical Specification 4.8.1.1.2.d requires certain surveillances (4.8.1.1.2.d.1 through 4.8.1.1.2.d.7) of the emergency diesel generators be performed "At least once per 18 months during shutdown." The proposed amendment allows a one-time only extension of the surveillance interval associated with Technical Specification 4.8.1.1.2.d until October 31, 1991. This extension allows performance of the required surveillances during the upcoming Unit 2 Reload 9 outage, currently scheduled to begin in September 1991.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides the proposed Technical Specification page for Unit 2.

Technical Specification 4.8.1.1.2.d required surveillances start becoming due by July 29, 1991 for diesel generator 3 and July 30, 1991 for diesel generator 4 (these dates include the 25% extension allowed by Technical Specification 4.0.2). Currently, these surveillances are planned to be performed during the Unit 2 surveillance testing outage scheduled to begin in June 1991. These surveillances represent a significant portion of the required work for this outage. Issuance of the requested amendment will allow performance of the surveillances during the upcoming Unit 2 Reload 9 outage currently scheduled to begin in September 1991, thereby saving approximately 1 week of critical path outage time during the Spring 1991 outage. Therefore, in order to realize this reduction in outage duration, CP&L requests that the NRC approve

9103250100 910318
PDR ADOCK 05000324
P PDR

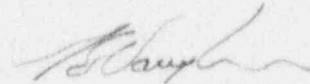
Adol
4/1

the requested license amendment by May 15, 1991. Issuance of this amendment, along with other actions being pursued by CP&L may obviate the need for a mid-cycle outage on Unit 2.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendments, once approved by the NRC, be issued with an effective date to be no later than 60 days from the issuance of the amendment.

On February 19, 1991, CP&L submitted a license amendment request entitled Request for License Amendment, 24 Month Diesel Generator Surveillance Interval (NLS-91-020). This submittal was made in anticipation of generic guidance regarding 18 month surveillance intervals expected to be issued by the NRC in the first quarter of 1991. Based on discussions with the NRR staff, the decision was made to re-submit the diesel generator license amendment as a one-time only extension because issuance of the Generic Letter was not expected in time to support CP&L's need date of May 15, 1991. As such, this submittal supersedes, in its entirety, the February 19, 1991 license amendment request regarding diesel generator surveillance intervals. Please refer any questions regarding this submittal to Mr. M. R. Oates at (919) 546-6063.

Yours very truly,



G. E. Vaughn

GEV/MAT

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Technical Specification Page - Unit 2

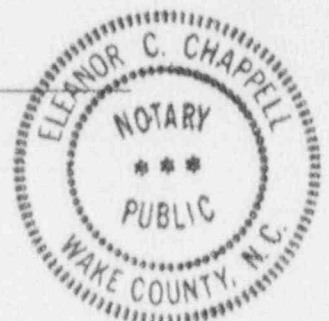
cc: Mr. Dayne H. Brown
Mr. S. D. Ebnetter
Mr. N. B. Le
Mr. R. L. Prevatte

G. E. Vaughn, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Eleanor C. Chappell

Notary (Seal)

My commission expires: 2/6/96



ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 2
NRC DOCKET 50-324
OPERATING LICENSE DPR-62
REQUEST FOR LICENSE AMENDMENT
ONE-TIME EXTENSION OF DIESEL GENERATOR SURVEILLANCE INTERVAL
BASIS FOR CHANGE REQUEST

Proposed Change

Technical Specification 4.8.1.1.2.d requires that certain surveillances (4.8.1.1.2.d.1 through 4.8.1.1.2.d.7) of the emergency diesel generators be performed "At least once per 18 months during shutdown." The proposed amendment allows a one-time only extension of the surveillance interval associated with Technical Specification 4.8.1.1.2.d until October 31, 1991. This extension allows performance of the required surveillances during the upcoming Unit 2 Reload 9 outage, currently scheduled to begin in September 1991.

Basis

Technical Specification 4.8.1.1.2.d requires certain surveillances (4.8.1.1.2.d.1 through 4.8.1.1.2.d.7) of the diesel generators be performed at least once per 18 months during shutdown. This 18 month interval has caused difficulties in the scheduling of the diesel generator surveillances. Typically, diesel generator surveillances are performed near the beginning of a refueling outage due to the availability of an outage window. This was the case for the Unit 2 Reload 8 outage during which portions of the recirculation piping were replaced. The pipe replacement effort resulted in a 23 week outage. The Unit 2 core was designed to provide an 18-month operating cycle with an assumed availability of 85%. Due to the extended Unit 2 Reload 8 outage, past performance of the required diesel generator surveillances during outage windows available early in the outage, and the Unit 2 core design, Technical Specification 4.8.1.1.2.d surveillances start becoming due by July 29, 1991 for diesel generator 3 and July 30, 1991 for diesel generator 4; prior to the planned September 7, 1991 start of the Unit 2 Reload 9 outage.

The proposed amendment allows a one-time only extension of the surveillance interval associated with Technical Specification 4.8.1.1.2.d until October 31, 1991. This extension allows performance of the required surveillances during the upcoming Unit 2 Reload 9 outage. The justification for the extended surveillance interval is based on the high degree of reliability demonstrated by the Brunswick diesel generators and discussions with the diesel manufacturer.

Over the past five years there have been no failures of the surveillances required by Technical Specifications 4.8.1.1.2.d.1, d.2, d.3, d.4, d.5, d.6, and d.7. This successful diesel generator testing history demonstrates the high reliability of the Brunswick diesel generators. As such, the effects of

extending the surveillance interval by a maximum of approximately 3 months for diesel generators 3 and 4 would be negligible.

In addition, the diesel manufacturer has indicated that diesel generator reliability can be maintained by performing the tear-down inspection required in Technical Specification 4.8.1.1.2.d.1 once per 1000 hours of diesel operation. During Unit 2 Cycle 9 the diesel generators 3 and 4 have been run only 40.5 and 40.0 hours respectively from April, 1990 through February, 1991. These run times are well below the vendor's recommended 1000 hour diesel generator inspection frequency.

Based on the above, the proposed one-time extension of the Technical Specification 4.8.1.1.2.d diesel generator surveillance interval will not significantly affect the diesel generators' ability to perform their intended safety function.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 2
NRC DOCKET 50-324
OPERATING LICENSE DPR-62
REQUEST FOR LICENSE AMENDMENT
ONE-TIME EXTENSION OF DIESEL GENERATOR SURVEILLANCE INTERVAL

BASIS FOR CHANGE REQUEST

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change

Technical Specification 4.8.1.1.2.d requires certain surveillances (4.8.1.1.2.d.1 through 4.8.1.1.2.d.7) of the emergency diesel generators be performed "At least once per 18 months during shutdown." The proposed amendment allows a one-time only extension of the surveillance interval associated with Technical Specification 4.8.1.1.2.d until October 31, 1991. This extension allows performance of the required surveillances during the upcoming Unit 2 Reload 9 outage, currently scheduled to begin in September 1991.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

A one-time extension of Technical Specification 4.8.1.1.2.d surveillances for diesel generators 3 and 4 until October 31, 1991 will not result in a significant increase in the probability of the diesel generators failing to perform their intended safety function. Historically, the diesel generators have demonstrated a high degree of reliability. Over the past five years there have been no failures of the surveillances required by Technical Specifications 4.8.1.1.2.d.1, d.2, d.3, d.4, d.5, d.6, and d.7. This successful diesel generator

testing history demonstrates the high reliability of the Brunswick diesel generators.

In addition, the diesel manufacturer has indicated that diesel generator reliability can be maintained by performing the tear-down inspection required in Technical Specification 4.8.1.1.2.d.1 once per 1000 hours of diesel operation. During Unit 2 Cycle 9 the diesel generators 3 and 4 have been run only 40.5 and 40.0 hours respectively from April, 1990 through February, 1991. These run times are well below the vendor's recommended 1000 hour diesel generator inspection frequency.

The diesel generator surveillance requirements are intended to maintain diesel generator reliability at a level which assures that adequate electrical power is available under the most limiting accident conditions within the accident analysis for the Brunswick Plant. The most limiting accident condition includes the loss of all off-site power and the assumed single failure of one diesel generator. The proposed one-time extension of the surveillance frequency will not adversely affect diesel generator availability. As stated above, past diesel generator performance has indicated a high degree of reliability over an extended period of time. Thus, extending the surveillance interval until October 31, 1991 will not involve a significant increase in the consequences of a previously evaluated accident.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendment only extends the surveillance interval for the diesel generators. There is no change to the plant or its manner of operation. Also, there are no changes to the surveillance acceptance criteria. Therefore, the proposed change cannot create the possibility of a new or different kind of accident from any previously evaluated.
3. The proposed amendment does not involve a significant reduction in the margin of safety. Extending the diesel generator surveillance interval to October 31, 1991 for diesel generators 3 and 4 will not result in a significant increase in the probability of the diesel generator failing to perform its intended safety function. The diesel generators have demonstrated an extremely high degree for reliability. Over the past five years there have been no failures of the surveillances required by Technical Specifications 4.8.1.1.2.d.1, d.2, d.3, d.4, d.5, d.6, and d.7. As such, the effects of a one-time extension of the surveillance interval would be negligible. The diesel manufacturer has indicated that diesel generator reliability can be maintained by performing the tear-down inspection required in Technical Specification 4.8.1.1.2.d.1 once per 1000 hours of diesel operation. During Unit 2 Cycle 9 the diesel generators 3 and 4 have been run only 40.5 and 40.0 hours respectively from April, 1990 through February, 1991. These run times are well below the vendor's recommended 1000 hour diesel generator inspection frequency and, therefore, diesel generator reliability will not be adversely affected by delaying the inspection required in Technical Specification 4.8.1.1.2.d.1 until October 31, 1991. In

addition, there are no changes to the surveillance acceptance criteria. Therefore, the proposed amendment does not involve a significant reduction in the margin of safety.