



Carolina Power & Light Company

November 18, 1981

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Serial No.: NO-81-1893

Office of Nuclear Reactor Regulation
ATTN: 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 -
REACTOR VESSEL REFERENCE LEVEL CLARIFICATION

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 the Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2. The purpose of the changes is to clarify the wording of reactor vessel water level references to prevent possible misunderstanding.

DISCUSSION

The establishment of a common zero level for all reactor vessel level instrumentation was TMI action item II.K.3.27 in NUREG-0737. Revised Technical Specifications were issued for Brunswick Units 1 and 2 in Amendment Nos. 38 and 60, respectively. However, the use of these specifications and further review have identified ambiguities and wording which could cause misinterpretation. Therefore, the attached changes have been developed to ensure a uniformity of treatment between the units and to provide language which is more easily understood.

Changes have been made to delete references to the "top fuel guide", since this was an ambiguous reference. The top fuel guide is approximately eight inches thick, but there was no indication of this in the Technical Specifications and the top fuel guide was never the actual zero point for vessel level. In addition, certain apparent discrepancies relating to the use of vessel zero in one case and "top of active fuel" in another have been clarified by the use of a single reference point.

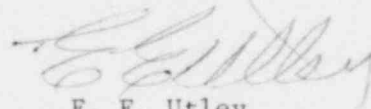
*Appl w/check
\$1,600*

ADMINISTRATIVE INFORMATION

You will find enclosed the revised Technical Specifications pages with the changes indicated by vertical lines in the right-hand margins. We have evaluated this request in accordance with the criteria in 10CFR170.22 and have determined that this request is administrative in nature; therefore, a Class II and a Class I license amendment fee are required for Units 1 and 2 respectively. Our check for \$1,600.00 is enclosed in payment of these fees.

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

Yours very truly,




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

WRM/lr (3912)

Enclosures

Sworn to and subscribed before me this 18th day of November, 1981.


Notary Public

My commission expires: Oct. 4, 1986

