



Carolina Power & Light Company

June 30, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
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
SUBMITTAL PURSUANT TO THE REQUIREMENTS OF 10CFR50, APPENDIX R, SECTION III.G
AND RESPONSE TO GENERIC LETTER 81-12

Dear Mr. Denton:

Summary

By letter dated May 4, 1982, the NRC granted to Carolina Power & Light Company (CP&L) an exemption from the schedule requirements of 10CFR50.48(c) of the NRC's fire protection regulations as requested by CP&L in its Petition for Exemptions dated March 6, 1981, as supplemented September 14, 1981 and January 18, 1982. The Commission extended until June 30, 1982, the date for CP&L's submittal of plans and schedules for achieving compliance with §50.48 and 10CFR50, Appendix R; for the filing of exemption requests pursuant to §50.48(c)(6); for submitting design descriptions of an alternative or dedicated shutdown system, if such is necessary. The Commission also extended until June 30, 1982, the date from which installation schedules established in §50.48(c)(2) and (3) are calculated.

Enclosed is CP&L's evaluation of Unit Nos. 1 and 2 of the Brunswick Steam Electric Plant (Brunswick) to the specific requirements of 10CFR50, Appendix R, Section III.G. In accordance with the guidance of the "Supplementary Information" section of the final fire protection rule published by the Commission on November 19, 1980, CP&L has, for Brunswick, reviewed those previously approved configurations of fire protection in order to determine those that do and those that do not meet the specific requirements of Section III.G of Appendix R. The results of this detailed re-examination are incorporated in the enclosed "Safe Shutdown Capability

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Assessment and Proposed Modifications" report (the Report). The Report includes a listing in tabular format of the fire zones of Brunswick. Fire zones which meet the requirements of Section III.G are identified, as are zones in the plant which will conform to Section III.G.1 or Section III.G.2 after modifications have been made. The Report also identifies the modifications which CP&L has determined are necessary to bring these fire zones into compliance with Section III.G.1 or Section III.G.2 and which CP&L proposes to make.

Section 6 of the Report discusses the exemptions from the specific requirements of Appendix R which CP&L is requesting. These exemption requests are in addition to those contained in CP&L's pending Petition for Exemptions from Certain Requirements of 10CFR50.48 and Appendix R to 10CFR50 dated March 6, 1981 as supplemented on September 14, 1981 and January 18, 1982.

Structure of the Report

The contents of the report are based, in part, on the NRC Staff's positions and perspectives advanced in discussions with the Nuclear Utility Fire Protection Group during the period of December 1981 to March 1982, and reflected in The Group's letter of March 16, 1982 to Richard H. Vollmer, Director, Division of Engineering, Office of Nuclear Reactor Regulation. Generic Letter 81-12 dated February 20, 1981 from Mr. D. G. Eisenhut contained information requests associated with modifications to implement an alternative or dedicated shutdown system. Our enclosed report specifically responds on a point-by-point basis to the February 20, 1981 request. It is CP&L's interpretation of the February 20 letter that the information requested did not relate to previously installed modifications to Brunswick for the installation of an alternative or dedicated shutdown system. Therefore, descriptions with regard to previously installed modifications are not included in this report.

It is important to note that, in the case of Brunswick, a complete Safety Evaluation Report for fire protection for both Brunswick Units 1 and 2 had been approved and issued by the NRC in June 1980, prior to issuance of 10CFR50, Appendix R. Accordingly, descriptions for the alternative shutdown system for the cable spread room, for example, are not included in the attached report. Nevertheless, that alternative shutdown system remains an integral part of our overall fire protection program and capabilities. Information describing the alternative shutdown system for the cable spread room has been previously submitted and reviewed and approved by the NRC Staff and is available in the Brunswick docket files. However, should the Staff require additional information or additional copies of this material, CP&L can provide such information upon request.

Modifications and Schedules

The Report identifies the modifications which CP&L has identified as necessary to bring fire zones of Brunswick into compliance with Appendix R, Sections III.G.1 and III.G.2. CP&L has developed preliminary, general implementation schedules for these modifications. Based upon estimated procurement times and planned outage schedules, CP&L will complete such modifications during the refueling outages presently scheduled for 1984 prior to the commencement of Cycle 5 for Unit 1 and Cycle 6 for Unit 2. CP&L will continue, however, its consideration of detailed design, procurement, engineering, and installation requirements and will modify this schedule, if possible, to complete implementation at an earlier date.

Exemptions

In accordance with 10CFR50.48(c)(6), CP&L also hereby requests exemption from the provisions of Section III.G.2 of 10CFR50 Appendix R for the specific fire areas at Brunswick described in Section 6 of the Report. The bases for the exemption requests identified in Section 6 are: (1) that the existing plant configurations in conjunction with additional modifications which CP&L will make to certain of these fire areas provide equivalent protection to the public health and safety to that which would be provided by the specific requirements of Section III.G.2 of Appendix R in those areas; and (2) that, therefore, the plant modifications necessary to comply with the specific requirements of Section III.G.2 would not enhance overall facility fire protection safety. CP&L believes that the existing configurations, given the light fire loadings of the areas, the degree of protection already inherent in the current design, and the additional modifications planned provide protection equivalent to that which would be achieved by conformance to the literal requirements of Section III.G.2.

In addition to the justifications for exemptions provided in the Report, CP&L has committed to continue to review and analyze affected areas within the plant. The results of such continuing review and analyses may serve as further and, perhaps, more detailed justification for the exemptions requested in the Report. CP&L will provide this information to the NRC as a matter of course as it becomes available.

If the exemptions requested are granted by the Commission, CP&L believes that a complete and sufficient demonstration of the conformance of the design of Brunswick to the level of safety articulated in Appendix R, Section III.G will have been achieved.

June 30, 1982

CP&L hereby reaffirms its requests for exemption from the installation of a fixed fire suppression system in the cable spread room for Brunswick, as set forth in CP&L's March 6, 1981 Petition, as supplemented, for the reasons and upon the technical bases previously furnished to the Commission by CP&L in that Petition and on other occasions. CP&L further emphasizes its understanding that the existing cable spread room arrangement taken in conjunction with the existing alternate shutdown provisions meets the requirements of Sections III.G.1 and .2 of Appendix R.

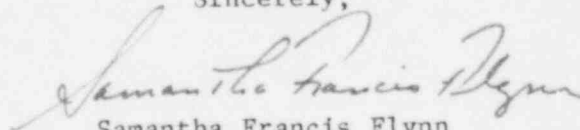
CP&L understands that with respect to matters which are the subject of exemption requests for the period of implementation of Appendix R will be tolled pending resolution of these exemption requests. Should the NRC Staff require further information to conduct their technical reviews, CP&L will furnish such additional information on request. Further, CP&L reserves the right to seek further exemptions from the technical requirements of Appendix R should later discovered facts and circumstances warrant such exemptions.

Verification

Subsequent to submitting the information in the enclosed Report, CP&L will continue its verification of the information provided to the NRC staff. In the event that any clarifications to the information contained in the Report are identified, CP&L will provide the necessary information to the NRC staff in a timely manner.

Our staff is available to discuss the enclosed Report, should you have any questions concerning the Brunswick fire protection program. If additional information is needed with respect to any aspect of this report, CP&L is prepared to work closely with the staff to identify and furnish such information as expeditiously as reasonably possible.

Sincerely,



Samantha Francis Flynn
Associate General Counsel

SFF/mf (080C4T1)
Attachments

cc: Mr. J. P. O'Reilly (NRC-R11)
NRC Resident Inspector, BSEP