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September 9, 1994

SERIAL: BSEP 94-0356
10 CFR 50.90
TSC 94TSB10

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

BRUNSWICK NUCLEAR PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
DRYWELL-SUPPRESSION CHAMBER VACUUM BREAKERS

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 Nos. 1 and 2. The proposed revision would revise the frequency for verifying the position of the drywell-suppression chamber vacuum breakers from at least once every 72 hours to at least once every 14 days. The proposed change is consistent with the guidelines of the Boiling Water Reactor Improved Standard Technical Specifications (NUREG-1433).

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 an environmental evaluation which demonstrates that the proposed amendments meet the eligibility for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides page change instructions for incorporating the proposed revisions.

Enclosure 5 provides the marked-up Technical Specification pages for Unit 1.

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Enclosure 6 provides the marked-up Technical Specification pages for Unit 2.

Enclosure 7 provides the typed Technical Specification pages for Unit 1.

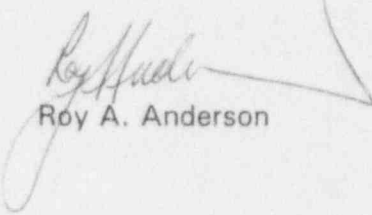
Enclosure 8 provides the typed Technical Specification pages for Unit 2.

Carolina Power & Light Company is providing, in accordance with 10 CFR 50.91(b), Mr. Dayne H. Brown of the State of North Carolina with a copy of the proposed license amendments.

Based on the NRC agreement to exercise enforcement discretion in accordance with Carolina Power & Light Company's letter dated September 8, 1994 (Serial: BSEP 94-0354), we request expedited NRC approval of this license amendment request. To facilitate implementation of these changes, CP&L requests that the amendments be issued with an effective date to be no later than 7 days from the issuance of the amendments.

Please refer any questions regarding this submittal to Mr. R. P. Lopriore at (910) 457-2404.

Sincerely,



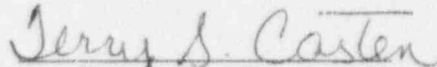
Roy A. Anderson

WRM/wrm

Enclosures:

1. Basis for Change Request
2. 10CFR50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Marked-up Technical Specification Pages - Unit 1
6. Marked-up Technical Specification Pages - Unit 2
7. Typed Technical Specification Pages - Unit 1
8. Typed Technical Specification Pages - Unit 2

Roy A. Anderson, 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, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires: 12-29-97

cc: Ms. P. D. Anderson
Mr. D. H. Brown, State of North Carolina
Mr. S. D. Ebnetter, Regional Administrator, Region II
Mr. P. D. Milano, NRR Senior Project Manager - Brunswick Units 1 and 2
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 AND 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT
DRYWELL-SUPPRESSION CHAMBER VACUUM BREAKERS

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE

The proposed change would revise the frequency for verifying the position of the drywell-suppression chamber vacuum breakers from at least once every 72 hours to at least once every 14 days. The proposed change is consistent with the testing frequency for this equipment that is stipulated in the Boiling Water Reactor Improved Standard Technical Specifications (NUREG-1433). The specific revisions to the Technical Specifications to implement, consistent with the BWR-4 Improved Standard Technical Specifications, the proposed changes are as follows:

1. Insert a new Specification 4.6.4.1.a which requires that each vacuum breaker be verified to be closed at least once per 14 days and within 2 hours after any discharge of steam to the suppression chamber from any source.
2. Due to the change in Item 1 above, revise the numbering of Technical Specification 4.6.4.1 as follows:

<u>FROM</u>	<u>TO</u>
4.6.4.1.a	4.6.4.1.b
4.6.4.1.b	4.6.4.1.c
4.6.4.1.c	4.6.4.1.d

3. Revise the reference to Specifications 4.6.4.1.a, 4.6.4.1.b, and 4.6.4.1.c contained in ACTIONS a, b, and c to reflect the incorporation of the additional surveillance requirement in (proposed) Technical Specification 4.6.4.1.a (see Items 1 and 2 above).
4. Revise the reference to Specification 4.6.4.1.b contained in Specification 4.6.4.1.c.2 based on the renumbering in Item 2 above.

BASIS FOR PROPOSED CHANGE

Current Requirement

Technical Specification 3.6.4.1, ACTION c requires the performance of surveillance testing every 72 hours in accordance with Technical Specification 4.6.4.1.b whenever the position indicator of any drywell-suppression chamber vacuum breaker is inoperable. Technical Specification 4.6.4.1.b requires that each drywell-suppression chamber vacuum breaker be demonstrated to be OPERABLE whenever the vacuum breaker is in the open position by conducting a test that verifies that the differential pressure is maintained greater than one-half ($\frac{1}{2}$) the initial differential pressure for one hour without makeup.

Proposed Requirement

The proposed Technical Specification revision would decrease the frequency for performing the surveillance testing specified in Technical Specification 3.6.4.1, ACTION c from "at least once per 72 hours" to "at least once per 14 days." The Improved Standard Technical Specifications for Type 4 Boiling Water Reactors (NUREG-1433 for BWR-4s) already include surveillance requirements specifying the verification of vacuum breaker position at least once per 14 days. If the position indication is inoperable, the Improved Standard Technical Specifications require that the vacuum breakers be verified to be closed through alternate means (i.e., a differential pressure test). Thus, the change to the testing frequency specified in Technical Specification 3.6.4.1, ACTION c is consistent with the guidance of the BWR-4 Improved Standard Technical Specifications.

The proposed revised wording for Technical Specification 3.6.4.1, ACTION c is as follows:

With the position indicator of any drywell-suppression chamber vacuum breaker inoperable, the provisions of Specification 3.0.4 are not applicable, and operation may continue provided the surveillance requirements of Specification 4.6.4.1.b are performed within 8 hours and at least once per 14 days thereafter, until the inoperable position indicator is returned to OPERABLE status; otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

In addition, a new surveillance requirement (proposed Specification 4.6.4.1.a) is being added which requires that each vacuum breaker be verified to be closed at least once per 14 days and within 2 hours after any discharge of steam to the suppression chamber from any source. As a result of adding the new Technical Specification 4.6.4.1.a, the existing items listed in Technical Specification 4.6.4.1 must be renumbered and references to these specifications must be updated in Technical Specification 3.6.4.1, ACTIONS a, b, and c and Technical Specification 4.6.4.1.c.2 (current reference). These changes to the Technical Specifications are administrative in nature.

Need For Exigency

On September 3, 1994 at approximately 2200 hours, the "closed" position indication for the 1-CAC-X18C vacuum breaker was lost. Since that time, CP&L has been performing a

differential pressure drop test in accordance with Technical Specification 4.6.4.1.b at least once per 72 hours.

Based on the results of differential pressure tests, CP&L has demonstrated the 1-CAC-X18C vacuum breaker is closed and that the problem being experienced is the result of an inoperable position indicator. The drywell-suppression chamber vacuum breakers are located inside of the primary containment suppression chamber (i.e., torus), an area that is not normally accessible during unit operation due to the inerted (i.e., nitrogen) atmosphere that is maintained for post-accident combustible gas control (Reference: Technical Specification 3.6.6.3.). Therefore, CP&L is unable to repair the inoperable position indicator without an unscheduled unit shutdown.

CP&L could not have reasonably foreseen that the 1-CAC-X18C vacuum breaker position indicator would fail. Since restart of Unit 1 and Unit 2, we have not experienced any additional vacuum breaker position indicator problems. It should be noted that the drywell-suppression chamber vacuum breaker position indicators have demonstrated a high degree of reliability.

Plant Design

The Brunswick Plant design has ten (10) vacuum relief breakers to equalize pressure between the drywell and the suppression chamber. This system is intended to maintain the structural integrity of the primary containment under conditions of large differential pressures by bleeding non-condensable gases from the suppression chamber into the drywell. The valves automatically open any time the vacuum setting is exceeded; no failure of the position switches will prevent the valves from operating.

The vacuum breaker valves are furnished with pneumatic operators and limit switches to allow remote cycling with positive indication of valve pallet displacement. Failure of the vacuum breaker valves in a partially open position is unlikely since the valves are provided with magnetic latches to assure positive closing.

There are an adequate number of vacuum breakers between the drywell and the suppression chamber to provide redundancy such that unit operation may continue with up to two (2) inoperable vacuum breakers secured in the closed position. The drywell-to-suppression chamber vacuum breakers must not be inoperable in the open position since this would allow bypassing and impact the pressure suppression capabilities of the suppression pool during a loss-of-coolant accident.

A sketch depicting the internal configuration of the vacuum breaker is enclosed.

Safety Significance And Potential Consequences

Based on the existing Technical Specification requirements, CP&L must perform a differential pressure test at least once per 72 hours to verify the affected vacuum breaker is closed. The differential pressure test (PT-2.3.1A) requires aligning the nitrogen inerting system and adding approximately 5,000 to 8,000 standard cubic feet of nitrogen to the

drywell at a nominal flow rate of 1,000 cfm with the torus vented. The drywell is pressurized to approximately 1.1 psig. Once the pressure is stabilized at approximately 1.0 psig, the pressure drop is monitored for one hour. This test verifies that the differential pressure is maintained greater than one-half the initial differential pressure for one hour without nitrogen makeup.

Three differential pressure tests have been performed to date. During the first differential pressure test (performed on September 4, 1994), the pressure inside the drywell dropped from 1.1 to 0.88 psig. During the second differential pressure test (performed on September 7, 1994), the pressure inside the drywell dropped from 1.05 to 0.93 psig. During the third test differential pressure test (performed on September 8, 1994), the pressure inside the drywell dropped from 1.04 psig to 0.91 psig. These tests demonstrate that the vacuum breaker is closed and is capable of performing its design function.

While performing the differential pressure tests, Maintenance and Engineering Support personnel observed that during the depressurization/pressure equalization phase of the test, the "closed" position indication for the affected vacuum breaker would initially indicate the valve being closed. As the differential pressure decreases, the "closed" position indication was lost. Based on the vacuum breaker configuration/design, the position indication (i.e., the limit switch within the valve) is believed to initially be making contact, but this contact is being lost as the pressure decreases and the vacuum breaker disk thrust on the rubber seating surface and limit switch diminishes. This further supports the conclusion that the vacuum breaker is closed properly, and that the problem being experienced is limited to the position indicator.

The high drywell pressure setpoint specified in Technical Specification Table 2.2.1-1, Item 7 is 2.0 psig (the actual setpoint is set to approximately 1.8 psig). If drywell pressure reaches or exceeds this setpoint, a reactor scram and Group 1 isolation will occur. Performing the differential pressure test described above involves a rapid pressurization of the drywell to approximately one (1) psig, which significantly reduces the operational margin that is normally maintained to the high drywell pressure setpoint. Revising the testing frequency from 72 hours to at least once per 14 days will reduce the opportunity for incurring an unnecessary plant transient. CP&L believes that continued testing of the drywell-suppression chamber vacuum breakers on the 72 hour frequency will not provide additional assurance that the vacuum breakers are capable of performing their design function. As such, the 72 hour frequency of testing does not provide a health and safety benefit to the public commensurate with the increased potential for incurring a unnecessary plant transient as a result of the more frequent testing in conjunction with the reduced operational margin between the actual drywell pressure and the high drywell pressure setpoint.

Based on the currently scheduled Unit 1 refueling outage start date of April 1, 1995, continued performance of the differential pressure test for the remainder of the current operating cycle would subject the Unit 1 drywell-suppression chamber vacuum breakers to at least 68 additional tests (based on the 72 hour test frequency). In contrast, the proposed 14 day testing frequency would result in the performance of only 15 additional tests. Based on the 72 hour test frequency, performance of the 68 additional tests results in the usage of 265,000 to 424,000 standard cubic feet of nitrogen. As a result, the

drywell at a nominal flow rate of 1,000 cfm with the torus vented. The drywell is pressurized to approximately 1.1 psig. Once the pressure is stabilized at approximately 1.0 psig, the pressure drop is monitored for one hour. This test verifies that the differential pressure is maintained greater than one-half the initial differential pressure for one hour without nitrogen makeup.

Three differential pressure tests have been performed to date. During the first differential pressure test (performed on September 4, 1994), the pressure inside the drywell dropped from 1.1 to 0.88 psig. During the second differential pressure test (performed on September 7, 1994), the pressure inside the drywell dropped from 1.05 to 0.93 psig. During the third test differential pressure test (performed on September 8, 1994), the pressure inside the drywell dropped from 1.04 psig to 0.91 psig. These tests demonstrate that the vacuum breaker is closed and is capable of performing its design function.

While performing the differential pressure tests, Maintenance and Engineering Support personnel observed that during the depressurization/pressure equalization phase of the test, the "closed" position indication for the affected vacuum breaker would initially indicate the valve being closed. As the differential pressure decreases, the "closed" position indication was lost. Based on the vacuum breaker configuration/design, the position indication (i.e., the limit switch within the valve) is believed to initially be making contact, but this contact is being lost as the pressure decreases and the vacuum breaker disk thrust on the rubber seating surface and limit switch diminishes. This further supports the conclusion that the vacuum breaker is closed properly, and that the problem being experienced is limited to the position indicator.

The high drywell pressure setpoint specified in Technical Specification Table 2.2.1-1, Item 7 is 2.0 psig (the actual setpoint is set to approximately 1.8 psig). If drywell pressure reaches or exceeds this setpoint, a reactor scram and Group 1 isolation will occur. Performing the differential pressure test described above involves a rapid pressurization of the drywell to approximately one (1) psig, which significantly reduces the operational margin that is normally maintained to the high drywell pressure setpoint. Revising the testing frequency from 72 hours to at least once per 14 days will reduce the opportunity for incurring an unnecessary plant transient. CP&L believes that continued testing of the drywell-suppression chamber vacuum breakers on the 72 hour frequency will not provide additional assurance that the vacuum breakers are capable of performing their design function. As such, the 72 hour frequency of testing does not provide a health and safety benefit to the public commensurate with the increased potential for incurring a unnecessary plant transient as a result of the more frequent testing in conjunction with the reduced operational margin between the actual drywell pressure and the high drywell pressure setpoint.

Based on the currently scheduled Unit 1 refueling outage start date of April 1, 1995, continued performance of the differential pressure test for the remainder of the current operating cycle would subject the Unit 1 drywell-suppression chamber vacuum breakers to at least 68 additional tests (based on the 72 hour test frequency). In contrast, the proposed 14 day testing frequency would result in the performance of only 15 additional tests. Based on the 72 hour test frequency, performance of the 68 additional tests results in the usage of 265,000 to 424,000 standard cubic feet of nitrogen. As a result, the

amount of primary containment purging operations must be similarly increased to maintain the containment pressure within Technical Specification limits (Reference: Technical Specification 3.6.1.5).

Relaxation of the frequency for verifying the position of the drywell-suppression chamber vacuum breakers of the existing Technical Specification 3.6.4.1, ACTION c from at least once every 72 hours to at least once every 14 days will not affect the ability of the drywell-suppression chamber vacuum breakers to perform their intended safety function. The extended frequency provides adequate assurance that the vacuum breakers will perform their intended safety function. Each drywell-suppression chamber vacuum breaker will continue to be demonstrated OPERABLE and closed at least once per 31 days and after any discharge of steam to the suppression chamber in accordance with Technical Specification 4.6.4.1.a.

The proposed Technical Specification Change would decrease the frequency for performing the surveillance testing specified in Technical Specification 3.6.4.1, ACTION c from "at least once per 72 hours" to "at least once per 14 days." The Improved Standard Technical Specifications for Type 4 Boiling Water Reactors (NUREG-1433 for BWR-4s) already include surveillance requirements specifying the testing and verification, through an alternate means, at least once per 14 days that each vacuum breaker is closed if the position indicating instruments for the affected vacuum breaker are inoperable. Thus, the change to the testing frequency specified in Technical Specification 3.6.4.1, ACTION c is consistent with the guidance of the BWR-4 Improved Standard Technical Specifications.

The Brunswick Technical Specifications currently do not contain a surveillance requirement to periodically verify that the vacuum breakers are closed. Also, the Brunswick Technical Specifications currently do not include a time interval for verifying the vacuum breakers are closed following a steam discharge to the suppression chamber. To ensure consistency with the BWR-4 Improved Standard Technical Specifications, a new surveillance requirement (proposed Specification 4.6.4.1.a) is being added which requires that each vacuum breaker be verified to be closed at least once per 14 days and within 2 hours after any discharge of steam to the suppression chamber from any source.

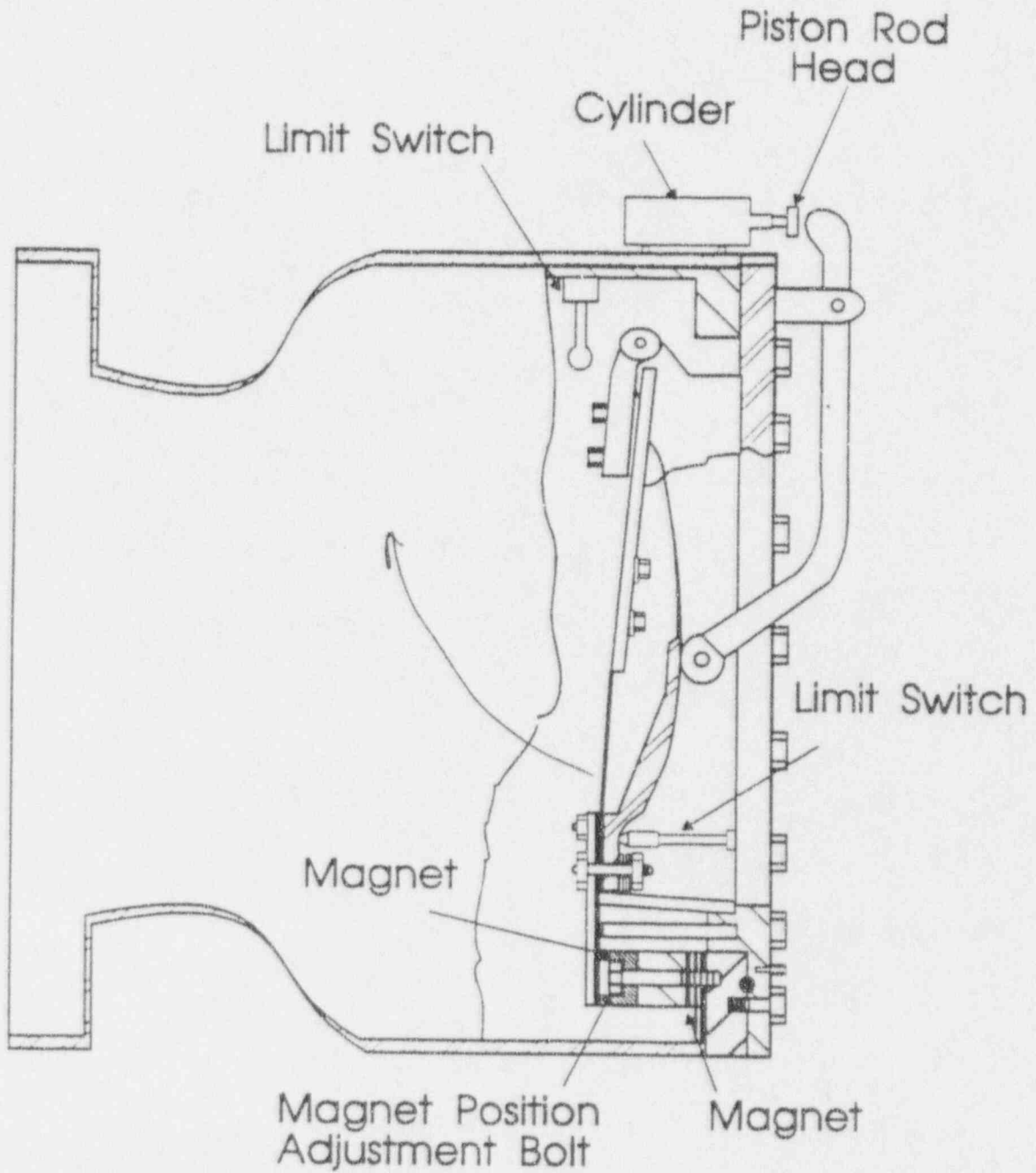
As a result of adding the new Technical Specification 4.6.4.1.a, the existing items listed in Technical Specification 4.6.4.1 must be renumbered and references to these specifications must be updated in Technical Specification 3.6.4.1, ACTIONS a, b, and c and Technical Specification 4.6.4.1.c.2 (current reference). These changes to the Technical Specifications are administrative in nature.

In addition to the proposed change to Technical Specification 3.6.4.1, ACTION c, the Bases section associated with this Technical Specification is being revised to include a statement from the Bases of the corresponding BWR-4 Improved Standard Technical Specification that provides the basis for the 14 day surveillance frequency. Accordingly, Bases 3/4.6.4 will be revised to include the following statement after the second paragraph:

The 14 day frequency stated in Specification 3.6.4.1, ACTION c and Specification 4.6.4.1 is based on engineering judgement, is considered adequate in view of other indications of vacuum breaker status available to operations personnel, and has been shown to be acceptable through operational experience.

In a policy statement concerning enforcement actions that was published in the March 17, 1993 Federal Register (58 FR 14308), the NRC noted that "... circumstances may arise where a licensee's compliance with a Technical Specification (TS) Limiting Condition for Operation would involve an unnecessary plant transient or performance of testing, inspection, or system realignment that is inappropriate with the plant specific conditions ... without a corresponding health and safety benefit" (emphasis added). CP&L believes that continued testing of the drywell-suppression chamber vacuum breakers on a 72 hour frequency will not provide additional assurance that the vacuum breakers are capable of performing their design function and, as such, that the 72 hour frequency of testing does not provide a health and safety benefit to the public.

Vacuum Breaker Cutaway



ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 AND 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT
DRYWELL-SUPPRESSION CHAMBER VACUUM BREAKERS

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 basis for this determination follows.

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

The proposed change revises the surveillance requirements associated with inoperable position indication for drywell-suppression chamber vacuum breakers. No safety-related equipment, safety function or plant operations will be altered as a result of the proposed change. The change does not affect the design, materials, or construction standards applicable to the vacuum breakers or their position indication instrumentation.

Relaxation of the frequency for verifying the position of the drywell-suppression chamber vacuum breakers from at least once every 72 hours to at least once every 14 days, as stated in the existing Technical Specification 3.6.4.1, ACTION c, will not affect the ability of the drywell-suppression chamber vacuum breakers to perform their intended safety function. The extended frequency provides adequate assurance that the vacuum breakers will perform their intended safety function. Each drywell-suppression chamber vacuum breaker will continue to be demonstrated OPERABLE and closed at least once per 31 days and after any discharge of steam to the suppression chamber in accordance with Technical Specification 4.6.4.1.a. In addition, the new surveillance requirement provided in proposed Technical Specification 4.6.4.1 a will require that each vacuum breaker be verified to be closed at least once every 14 days. The new surveillance provides further assurance that the vacuum breakers are capable of performing their design function under accident conditions of allowing the venting of non-condensable gases from the suppression chamber to the drywell while not allowing bypass flow from the drywell to the suppression chamber.

Based on the above, the proposed license amendment does not create a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

As stated above, no safety-related equipment, safety function or plant operations will be altered as a result of the proposed change. The change does not affect the design, materials, or construction standards applicable to the vacuum breakers or their position indication instrumentation.

Relaxation of the frequency for verifying the position of the drywell-suppression chamber vacuum breakers of the existing Technical Specification 3.6.4.1, ACTION c from at least once every 72 hours to at least once every 14 days will not affect the ability of the drywell-suppression chamber vacuum breakers to perform their intended safety function.

In addition, the new surveillance requirement provided in proposed Technical Specification 4.6.4.1.a will require that each vacuum breaker be verified to be closed at least once every 14 days. The new surveillance will provide further assurance that the vacuum breakers are capable of performing their design function under accident conditions without altering plant operations in a manner that would create a new or different kind of accident.

As such, the proposed license amendment cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in a margin of safety.

The proposed change does not involve any changes to the plant design or operation. Therefore, no margins of safety, as defined by the plant's accident analyses, are impacted. Relaxation of the frequency for verifying the position of the drywell-suppression chamber vacuum breakers of the existing Technical Specification 3.6.4.1, ACTION c from at least once every 72 hours to at least once every 14 days will not affect the ability of the drywell-suppression chamber vacuum breakers to perform their intended safety function. The extended frequency provides adequate assurance that the vacuum breakers will perform their intended safety function. Each drywell-suppression chamber vacuum breaker will continue to be demonstrated OPERABLE and closed at least once per 31 days and after any discharge of steam to the suppression chamber in accordance with Technical Specification 4.6.4.1.a.

In addition, performance of Technical Specification 4.6.4.1.b requires pressurization of the drywell to approximately 1.0 psig and then verifying that the differential drywell to suppression chamber pressure is maintained greater than one-half the initial differential pressure for one hour without nitrogen makeup. During this evolution actual pressure will increase as high as 1.1 psig before stabilizing. The

Drywell Pressure - High setpoint, which initiates a reactor scram and a Group 1 isolation, is less than or equal to 2.0 psig (the actual setpoint is 1.8 psig). As such, performance of this evolution once per 72 hours unnecessarily risks a plant transient without providing a significant increase in the level of safety gained by performing the verification on a 14 day frequency.

The new surveillance requirement provided in proposed Technical Specification 4.6.4.1.a will require that each vacuum breaker be verified to be closed at least once every 14 days. The new surveillance provides further assurance that the vacuum breakers are capable of performing their design function under accident conditions of allowing the venting of non-condensable gases from the suppression chamber to the drywell while not allowing bypass flow from the drywell to the suppression chamber.

Based on the above reasoning, the proposed license amendment does not involve a significant reduction in the margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 AND 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT
DRYWELL-SUPPRESSION CHAMBER VACUUM BREAKERS

ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(c), no environmental impact statement of environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows.

1. This amendment does not involve a significant hazards consideration, as shown in Enclosure 2.
2. The proposed license amendment does not result in a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite. The proposed license amendment does not introduce any new equipment nor does it require any existing equipment or systems to perform a different type of function than they are presently designed to perform. The proposed license amendment does not alter the function of the instrumentation and will ensure that the consequences of any previously evaluated accident do not increase. Therefore, CP&L has concluded that there will not be a significant increase in the types or amounts of any effluent that may be released offsite and, as such, does not involve irreversible environmental consequences beyond those already associated with normal operation.
3. This amendment does not result in an increase in individual or cumulative occupational radiation exposure.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 AND 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT
DRYWELL-SUPPRESSION CHAMBER VACUUM BREAKERS

PAGE CHANGE INSTRUCTIONS

UNIT 1

Removed page	Inserted page
3/4 6-18	3/4 6-18
3/4 6-19	3/4 6-19
B 3/4 6-5	B 3/4 6-5

UNIT 2

Removed page	Inserted page
3/4 6-18	3/4 6-18
3/4 6-19	3/4 6-19
B 3/4 6-5	B 3/4 6-5