



Carolina Power & Light Company
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OCT 05 1994

SERIAL: BSEP 94-0362
10 CFR 50.55a

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI
IN-SERVICE INSPECTION PROGRAM RELIEF REQUEST
USE OF ASME CODE CASE N-522

Gentlemen:

The purpose of this letter is to request relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, in accordance with 10 CFR 50.55a(g)(6)(ii), for the Brunswick Steam Electric Plant, Units 1 and 2. CP&L requests permission to use the alternative requirements of ASME Code Case N-522 for containment penetration piping associated with Drywell Drains, Service Air, Reactor Building Closed Loop Cooling (RBCCW)/Penetration Cooling, Control Rod Drive (CRD), Reactor Recirculation (seal cooling lines), Containment Atmosphere Control (CAC), and Containment Atmosphere Monitoring (CAM).

The detailed request for relief is provided in Enclosure 1. Approval of this relief request is needed by March 1, 1995 in order to support planning activities for the upcoming Unit 1 refueling outage, which is currently scheduled to begin on April 1, 1995.

Carolina Power & Light Company considers this to be a Cost Beneficial Licensing Action with an approximate savings of \$168,000 over the life of the units.

Please refer any questions regarding this submittal to Mr. R. P. Lopriore at (910) 457-2212.

Very truly yours,

R. P. Lopriore, Manager—Regulatory Affairs
Brunswick Nuclear Plant

WRM/wrm

Enclosure

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PDR ADDCK 05000324
PDR

AC47

cc (with enclosure):

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, NRC Senior Resident Inspector - Brunswick Units 1 and 2
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI
IN-SERVICE INSPECTION PROGRAM RELIEF REQUEST
USE OF ASME CODE CASE N-522

Unit:	1 and 2
Components:	Containment Penetration Piping
Systems:	Drywell Drains, Service Air, Reactor Building Closed Cooling Water Cooling (RBCCW)/Penetration Cooling, Control Rod Drive (CRD), Reactor Recirculation (seal cooling lines), Containment Atmosphere Control (CAC), and Containment Atmosphere Monitoring (CAM)
Class:	2
Code Requirement:	The American Society of Mechanical Engineers (ASME) Code, Section XI, 1980 Edition through the 1981 Addenda, Table IWC-2500-1, Category C-H, pressure tests.
Proposed Alternative:	CP&L proposes to use American Society of Mechanical Engineers (ASME) Code Case N-522 in lieu of the pressure testing required per the ASME Code, Section XI, Category C-H. This code case allows the use of the 10 CFR 50, Appendix J pressure testing of piping that penetrates a containment vessel, when the piping and isolation valves that are part of the containment system are Class 2 but the balance of the piping system is outside the scope of the ASME Code, Section XI.
Basis For The Proposed Alternative	<p>The pressure testing of the above referenced Class 2 penetrations imposes undo hardship for the following reasons:</p> <p>The performance of the pressure testing required by the ASME Code, Section XI would require an additional VT-2 examination be performed during the 10 CFR 50, Appendix J testing or system operation at nominal pressure. The extra examination increases dose (approximately 3.5 man-REM per required performance, totalling 42 Rem over the life of the units) and outage man-power resources has</p>

outage impact by lengthening the duration of the Appendix J testing (including ASME VT-2 hold times), and requires liquid leak detection equipment (i.e. snoop) be used over the entire length of the piping to the first valves on each side of the penetration or the use of sonic detectors (sonic detectors are mostly unreliable depending on background noise).

The ASME Code, Section XI pressure testing does not provide an increase in the level of quality or safety because integrity will be demonstrated by the 10 CFR 50, Appendix J testing in lieu of the ASME Code, Section XI testing.