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SERIAL: BSEP 94-0386
10 CFR 50.90
TSC 94TSB11

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 AMENDMENTS
DELETION OF REMAINING ENVIRONMENTAL TECHNICAL SPECIFICATIONS

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company hereby requests amendments to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed amendments would delete the license conditions of the Appendix B Environmental Technical Specifications (ETS) which pertains to non-radiological hydraulic limitations regarding discharge canal level and meteorological monitoring.

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.

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

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

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

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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.

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.

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

Very truly yours,



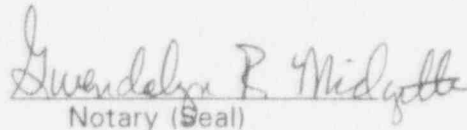
John Paul Cowan

GMT/

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 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 Page - Unit 1
8. Typed Technical Specification Page - Unit 2

John Paul Cowan, 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: August 12, 1996

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

GRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
DELETION OF APPENDIX B, ENVIRONMENTAL TECHNICAL SPECIFICATIONS

BASIS FOR CHANGE REQUEST

Proposed Change

The proposed change would delete the remainder of Appendix B, Environmental Technical Specifications (ETS), including section 2/3.3.1 Water Level in the Discharge Canal and Section 2/3.4 Meteorology. These sections provide requirements for minimum and maximum water level in the discharge canal and meteorological monitoring.

This proposed change is consistent with 10 CFR 50 Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors (page 39132 of the Federal Register Vol. 58 No. 139). The items being deleted are not covered in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4", and do not meet any of the four Criterion listed in the final policy statement for items that should be included in Technical Specifications. The ETS meteorological and discharge canal requirements do not affect:

- 1 Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;
- 2 A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident (DBA) or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- 3 A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; or
- 4 A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Basis For Proposed Change

The ETS discharge canal level requirements are redundant to those established in the Updated Final Safety Analysis Report (UFSAR) (section 2.4.8.3.3) which limit the average discharge canal water level below the weir to Elevation 4.5 ft mean sea level (msl) for

normal tide levels of msl 0 + or - 2 ft. These restrictions were established to minimize the impact of the discharge canal on the local groundwater supply. National Pollutant Discharge Elimination System (NPDES) Permit No. NC0007064 regulates the continued operation of the 9.6 miles of canal supporting site cooling water systems. The permit contains provisions for a groundwater monitoring program acceptable to the State of North Carolina; Department of Environment, Health and Natural Resources; Division of Environmental Management. The Brunswick site has a Groundwater Monitoring Program (O-E&RC-3250) in place independent of the ETS discharge canal level operating/monitoring requirements. With the ETS deleted, changes would be administratively controlled within the provisions of 10 CFR 50.59 and the State of North Carolina's permitting process.

The meteorological monitoring program is delineated in UFSAR section 2.3.3, On-site Meteorological Measurements Program and is based on the meteorological monitoring program described in Regulatory Guide 1.23, and NUREG-0654. The existing program also meets the requirements stated in Appendix E to 10 CFR 50 by providing meteorological systems adequate for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment. The Emergency Response Plan (Section 5.7.2) also documents the meteorological instrumentation used in making off-site dose projections, and includes 24 hour per day backup provisions by the Wilmington NC office of the National Weather Service. As such, any changes that would reduce the effectiveness of this program would require prior NRC approval per the requirement of 10 CFR 50.54(q). A meteorological monitoring program is also necessary to supply the hourly meteorological data required by Technical Specification 6.9.1.10.a, Semiannual Radioactive Effluent Release Report.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
DELETION OF ENVIRONMENTAL TECHNICAL SPECIFICATIONS

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 believes that its adoption would not involve a significant hazards consideration. The basis for this determination follows.

Hydraulic - Water level in the Discharge Canal

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The deletion of the discharge canal specification of 4.5 +/- 1 ft mean sea level (msl) with daily monitoring still leaves the operating restrictions delineated in Updated Final Safety Analysis Report (UFSAR) section 2.4.8.3.3 (4.5 +/- 2 ft msl) and the National Pollutant Discharge Elimination System (NPDES) permit requirements to minimize the impact of the discharge canal on the local groundwater supply. As stated in this UFSAR section the effect on the local ground water regime will be minimal within this band. Level recorders in the control room facilitate the continued monitoring the discharge canal level in excess of the Appendix B Environment Technical Specification (ETS) listed daily surveillance. This change in no way affects the design or operation of equipment that could initiate or mitigate any 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. The discharge canal level is an environmental concern with the effects of a spill of radioactive liquids (UFSAR section 2.4.12.3) being a path to the intake canal, due to the areas natural gradient. With the estimated travel time for the liquid to reach the canal (intake) at 60 years, and the large flow rate the degree of dilution is such that this does not pose a threat to local wells. The amendment would not affect the operation or design of any plant equipment; therefore, no new credible accidents are created. In addition, the proposed amendment would not affect the capability of the response systems to mitigate the consequences of any accident previously evaluated; therefore, no new or different accident would result from this change.

3. The proposed amendment does not involve a significant reduction in a margin of safety. The existence of these ETS does not provide a margin of safety related to the nuclear operation of the site. No safety limits are affected by this change. Therefore, this amendment would not result in a reduction in any margin of safety.

Meteorology

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The deletion of the meteorology specification still leaves the program delineated in UFSAR section 2.3.3, Onsite Meteorological Measurements Program, and reporting/recording of the hourly meteorological data required to support Technical Specification 6.9.1.10.a, Semiannual Radioactive Effluent Release Report. This program is based on the meteorological monitoring program described in Regulatory Guide 1.23, and NUREG-0654. While the existing ETS 30 day reporting requirement for extended out-of-service time and shiftly manual acquisition of data during batch or accidental releases are not otherwise covered, the program does contain the Regulatory Guide 1.23 reference to 90% data recovery and a backup phone line is available for data retrieval. This proposed amendment in no way affects the design or operation of equipment that could initiate or mitigate any 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. The meteorological monitoring program is specified in UFSAR Section 2.3.3. The amendment would not affect the operation or design of any plant equipment; therefore, no new credible accidents are created. In addition, the proposed amendment would not affect the capability of the response systems to mitigate the consequences of any accident previously evaluated nor would the amendment reduce the effectiveness of the Emergency Response Plan; therefore, no new or different accident would result from this change.
3. The proposed amendment does not involve a significant reduction in a margin of safety. The meteorological ETS does not provide any additional margin of safety related to the operation of a nuclear plant. The meteorological program established in the UFSAR covers the requirements stated in Appendix E to 10 CFR 50 by providing meteorological systems adequate for determining the magnitude of, and for continuously assessing the impact of, the release of radioactive materials to the environment. The meteorological instrumentation is used to measure environmental parameters which may affect distribution of fission products and gases following a Design Basis Accident (DBA); however, it is not a primary success path for the mitigation of a DBA. No safety limits are affected by this change. Therefore, this amendment would not result in a reduction in any margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
DELETION OF ENVIRONMENTAL TECHNICAL SPECIFICATIONS

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 believes 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. This amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The amendment is the elimination of Appendix B, Environmental Technical Specification, requirements regarding discharge canal level and meteorological monitoring. These areas are addressed in the Updated FSAR, where the existing controls are adequate to ensure that any future changes are appropriately evaluated. Therefore, no negative impact on any systems which could affect the types or amounts of effluents released would occur.
3. This amendment does not result in an increase in individual or cumulative occupational radiation exposure. The amendment involves the elimination of Appendix B, Environmental Technical Specifications which duplicates programs already specified in the Updated Final Safety Analysis Report (UFSAR), the National Pollutant Discharge Elimination System (NPDES) permit, or the Emergency Response Plan. No changes in radiation levels or exposure times will result from this change. Therefore, no increases in individual or cumulative occupational radiation exposure would result from this amendment.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
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PAGE CHANGE INSTRUCTIONS

UNIT 1

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UNIT 2

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All Appendix B	Appendix B cover page