



Carolina Power & Light Company

SERIAL: LAP-83-394

SEP 29 1983

Director of Nuclear Reactor Regulation  
Attention: Mr. D. B. Vassallo, Chief  
Operating Reactors Branch No. 2  
Division of Licensing  
United States Nuclear Regulatory Commission  
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  
REQUEST FOR LICENSE AMENDMENT  
FEEDWATER AND MAIN TURBINE TRIP/BYPASS SYSTEMS

Dear Mr. Vassallo:

#### SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. The proposed revisions involve the imposition of additional TS requirements for the feedwater/main turbine trip system actuation instrumentation and the main turbine bypass system.

#### DISCUSSION

By letter dated June 20, 1983 (SERIAL: LAP-83-233), CP&L agreed to submit proposed plant-specific TS revisions relating to the feedwater/main turbine trip system actuation instrumentation and the main turbine bypass system. The Brunswick-1 and Brunswick-2 plant-specific versions of the Standard Technical Specifications requirements for the subject systems are provided in Enclosures 2 and 3. A summary of the major differences between the Standard Technical Specification (STS) requirements and the proposed TS requirements is provided in Enclosure 1.

#### SIGNIFICANT HAZARD ANALYSIS

Carolina Power & Light Company has reviewed this request and determined that the proposed TS revisions involve no significant hazard consideration because the proposed changes constitute additional limitations and restrictions not presently included in the TS. The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards considerations by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). One of the examples of an amendment which will likely be found to involve no significant hazards considerations is a change that constitutes an additional limitation, restriction, or control not presently included in the TS. The proposed changes impose additional limitations, restrictions, or controls not presently included in the TS and fall within the Commission's example (ii) of an action not likely to involve a significant hazard consideration.

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ADMINISTRATIVE INFORMATION

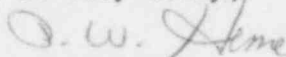
Enclosed are revised TS pages for Brunswick-1 and Brunswick-2 with the changes indicated by vertical lines in the right-hand margins. In accordance with the criteria in 10 CFR 170.22, we have determined that this request involves a Class III and a Class I license amendment fee for Brunswick-1 and Brunswick-2, respectively. Therefore, our check for \$4,400.00 is enclosed as payment of the amendment fees.

Carolina Power & Light Company is aware that the issue of the appropriateness of imposing these TS requirements on existing operating BWRs has been raised and discussed with the NRC Staff, most notably in a meeting between the Staff and Georgia Power Company on July 13, 1983 for the Hatch Plant Unit 2. Carolina Power & Light Company also believes that the imposition of these TS requirements represents a new generic concern which should be reviewed by the Committee to Review Generic Requirements (CRGR). Based on the NRC's continuing evaluation of those arguments presented at the July 13, 1983 meeting for considering the imposition of these TS as a new generic concern, CP&L requests that the issuance of the enclosed proposed TS be held in abeyance until a consensus is reached on the proper forum for resolving this issue.

Additionally, based on the above stated positions, CP&L has determined that implementation of these proposed requirements is inappropriate pending their final resolution. Hence, implementation of these TS requirements will not be initiated until NRC issuance of any resultant license amendment.

If you should have any questions concerning this submittal, please contact our staff.

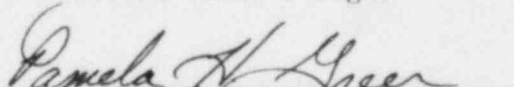
Yours very truly,



P. W. Howe  
Vice President  
Brunswick Nuclear Project

WRM/pgp (7741WRM)  
Enclosures

P. W. Howe, 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, contractors, and agents of Carolina Power & Light Company.

  
Notary (Seal)

My commission expires: *April 15, 1984*

cc: Mr. D. O. Myers (NRC-BSEP)  
Mr. J. P. O'Reilly (NRC-RII)  
Mr. S. D. MacKay (NRC)

Mr. Dayne H. Brown  
Radiation Protection Branch  
Division of Facility Services  
Department of Human Resources

ENCLOSURE 1  
TO LAP-83-394

The enclosed proposed TS revisions are identical for both Brunswick units and differ from the GE/BWR-4 STS in following respects:

1. The STS requirements concerning the feedwater/main turbine trip system are written in the form of "plant systems actuation instrumentation" (STS 3/4.3.9). The suppression pool and drywell spray system requirements are not relevant to the issue under discussion and have been deleted; therefore, the proposed TS were written in terms of the feedwater/main turbine trip system.
2. The STS applicability for the feedwater/main turbine trip system was revised to Operational Condition 1 to correspond to the applicable operational conditions shown in STS Table 3.3.9-1, item 2.a, reactor vessel water level-high, level 8. This applicability requirement would also correspond correctly with the applicability of proposed TS 3/4.7.9, Main Turbine Bypass System.
3. The actions required under proposed TS 3/4.3.8 have been revised because the STS Actions (a) and (c) are inconsistent. STS Action (a), which corresponds to proposed TS 3/4.3.8 Action (a), requires either the tripping of a channel that has a setpoint out of calibration or declaring the associated system inoperable. However, there is not a limiting condition for operation on the associated systems for the feedwater/main turbine trip system. In addition, STS Actions (c.1) and (c.2) permit one instrument channel to be inoperable for 7 days or two instrument channels to be inoperable for 72 hours. Since the Brunswick logic is a two-out-of-three channels arrangement, placing two channels in the tripped condition will cause the feedwater/main turbine system to trip, resulting in a plant scram.
4. The frequency for performing a channel functional test, as specified in proposed TS Table 4.3.8.1-1, was changed to quarterly in order to reduce the impact of such surveillance testing on plant availability.
5. For proposed TS 3/4.7.9, Main Turbine Bypass System, the two hour action time has been revised to twelve hours to allow adequate time for identification of the problem and initiation of correction actions.

The enclosed TS changes do not include a TS Section 3/4.3.7, Reactor Core Isolation Cooling System Actuation Instrumentation. A proposed TS 3/4.3.7 and the associated Bases were submitted in our letter dated June 23, 1983 (SERIAL: LAP-83-227) concerning TS requirements for certain NUREG-0737 items.

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