



Carolina Power & Light Company

SERIAL: LAP-83-430

OCT 03 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  
PRIMARY CONTAINMENT INTEGRATED LEAK RATE TESTING

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 TS revise the following: (1) the applicability of the requirements of Specification 4.0.2 for the 18-month interval surveillance requirements, and (2) the format of the TS requirements concerning primary containment leakage to conform with the format of more recent revisions of the Standard Technical Specifications (STS).

DISCUSSION

Brunswick Technical Specification 4.0.2, where applicable, permits the extension of a surveillance interval by up to twenty five percent. However, the current Brunswick TS 4.6.1.2.h states that the provisions of Specification 4.0.2 are not applicable to the surveillance requirements of TS 4.6.1.2 concerning Type A, B, and C leak tests. The proposed change to the Brunswick-1 and Brunswick-2 TS would allow the provisions of Specification 4.0.2 to apply to certain of the surveillance requirements in TS 4.6.1.2.

The STS allow the provisions of Specification 4.0.2 to apply to the 18 month surveillance requirements concerning containment leak tests. Specifically, an extension of the 18 month surveillance interval for the Type A Overall Integrated Containment Leak Rate Test (ILRT) and the leak testing of the main steam line isolation valves is permitted under the STS. This allowance is consistent with the requirements of Appendix J to 10 CFR 50.

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Appendix J of 10 CFR 50 requires that a Type A Overall Integrated Containment Leakage Rate test be performed approximately every eighteen months for a primary containment that has failed to meet the applicable leakage limits during two consecutive Type A tests. Brunswick TS 4.6.1.2.b requires that if two consecutive Type A tests fail to meet the required leakage limits, a Type A test be performed at least every 18 months.

The proposed TS would permit the extension of the 18 month surveillance intervals referenced above, but would not allow the extension of 24 month and  $40 \pm 10$  month interval surveillances. In addition to the revision concerning the requirements of TS 4.0.2, the format of the TS requirements concerning primary containment leakage have been reformatted to be consistent with more recent revisions of the STS.

#### SIGNIFICANT HAZARDS 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 make the Technical Specifications, which is Appendix A of the Brunswick Operating License, conform to the provisions of 10 CFR 50, Appendix J. 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 to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. The proposed changes, which simply provide some limited flexibility in scheduling containment leak testing surveillance consistent with planned outages, do not result in a long-term extension of the surveillance schedule because of the requirements of Specification 4.0.2.b (the 3.25 times the surveillance interval rule), make the Brunswick TS conform more closely with the requirements of Appendix J to 10 CFR 50, and are clearly in keeping with the NRC Staff guidance provided in the Standard Technical Specifications. Therefore, CP&L believes the proposed changes are similar to and fall within the Commission's example (vii) of an action not likely to involve a significant hazards consideration.

#### ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 TS pages are provided in Enclosure 1. The proposed Brunswick-2 TS pages are provided in Enclosure 2. We have evaluated this request in accordance with the provisions of 10 CFR 170.22 and have determined that a Class III and a Class I license amendment fee are required. A check for \$4,400.00 is enclosed in payment of these license amendment fees.

D. B. Vassallo

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The Brunswick-2 primary containment Integrated Leak Rate Test is presently due by January 15, 1984 (the end of the current 18 month surveillance interval). We request your expedited review of this request in order that the Brunswick-2 ILRT may be extended until the Brunswick-2 refueling outage, presently scheduled to begin in early March 1984.

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

Yours very truly,

*P. W. Howe*

P. W. Howe  
Vice President  
Brunswick Nuclear Project

WRM/ccc (7928WRM)  
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.

*Franklin Murray*  
Notary (Seal)

My commission expires: OCT 04 1986

cc: Mr. Dayne H. Brown  
Radiation Protection Branch  
Division of Facility Services  
Department of Human Resources  
Mr. D. O. Myers (NRC-BSEP)  
Mr. J. P. O'Reilly (NRC-RII)  
Mr. S. D. MacKay (NRC)

