



Carolina Power & Light Company

SERIAL: LAP-83-585

December 22, 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
CONTAINMENT VENT VALVE OPERABILITY

Dear Mr. Vassallo:

Your letter dated December 1, 1983 requested Carolina Power & Light Company (CP&L) to provide some additional information concerning Containment Vent Valve Operability. In response to your request, please find the answers, to your specific concerns, listed below:

Item 1: CP&L should assess the operability of the purge and vent valves in light of the concerns outlined in Enclosure 1 attached to the December 1, 1983 letter.

Response: CP&L considers the valves operable on the basis that the provision of the interim requirements will continue to be in place until final approval by the NRC. Also, the NRC concerns pertaining to the calculation of static and aerodynamic stresses for any of the critical parts of the valves or operators have been relayed to the vendor for reanalysis. It is the vendor's opinion that the reanalysis will support full operability without the limitations set forth in the interim requirements (e.g. limiting valve position to less than 50° open). Limiting the valves' opening position to less than 50° significantly reduces the stresses of the valves critical components. This reanalysis is expected to be completed by the vendor by January 31, 1984. CP&L will review this analysis and submit it to the NRC by February 29, 1984.

With regards to the seismic analysis concerns listed in Enclosure 1 above, CP&L has recently discovered that attachment 2 to our November 17, 1981 submittal entitled "Seismic Calculations for Containment Purge and Vent Valves," was not the most up-to-date calculation performed by Posi-Seal. As a result of conversations between CP&L and our Architect Engineer (AE), CP&L has found some correspondence between the AE and Posi-Seal which indicates that

8312290284 831222
PDR ADOCK 05000324
PDR
P

A034
110

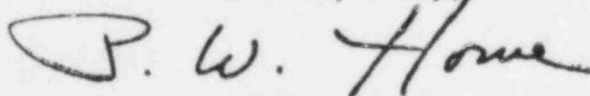
the AE had similar concerns to those outlined in Enclosure 1 with regards to the seismic analysis dated August 28, 1972. The correspondence also indicates that a revised analysis was performed and that the concerns were resolved. However, at this time we have been unable to retrieve the revised analysis. The archives are being researched to locate the revised calculations and if these calculations cannot be found, they will be reconstructed, reviewed, and then forwarded to the NRC by February 29, 1984.

Item 2: Until operability is demonstrated, CP&L should intend to maintain the purge and vent valves sealed closed in accordance with Standard Review Plan Section 6.2.4, II.6.f and to verify them to be closed every 31 days whenever the reactor is not in the cold shutdown or refueling operational condition until such time as you submit acceptable information that demonstrates that your purge/vent valves will operate in the event of a DBA-LOCA.

Response: Limited venting and purging must be allowed during operation to maintain Technical Specification limits for oxygen concentration less than 4 percent and drywell pressure less than 1.75 psi, both resulting from small instrument air leaks occurring in the drywell. Without the venting and purging capability, BSEP would be required to shut down until the analysis by Posi-Seal is complete. The BSEP operating procedures for the Containment Atmosphere Control (CAC) system are very specific concerning limited venting and purging and the hours when the CAC system is used are logged per the operating procedure.

In summary, CP&L will continue to observe the provisions of the NRC's interim position while we are awaiting Posi-Seal's detailed analysis. Upon receipt of the analysis, it and the seismic analysis will be scrutinized by our staff and transmitted to the NRC. This should be transmitted to the NRC by February 29, 1984. We will then await your concurrence to remove the travel limitations and to re-energize those valves that were deenergized due to their inaccessability for the travel limitation modification. Should you have any questions concerning this submittal, please contact a member of our licensing staff.

Yours very truly,



P. W. Howe

Vice President

Brunswick Nuclear Project

PPC/kjr (9144PPC)

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