



Carolina Power & Light Company

SERIAL: LAP-83-581

DEC 20 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
BATTERY CAPACITY TEST
REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Vassallo:

In a letter dated December 7, 1983 (Serial: LAP-83-564), Carolina Power & Light Company (CP&L) requested a change to the Technical Specifications (TS) for the Brunswick Steam Electric Plant Unit No. 2. This revision affects the surveillance requirements for the 125-volt battery (bank 2A-2) specified in TS 4.8.2.3.2.d.2.a.

Following several telephone conversations conducted on December 16, 1983 with members of the Staff, CP&L was requested to provide some additional information concerning the requirements of TS 4.8.2.3.2.d.1 and TS 4.8.2.3.2.d.2. Specification 4.8.2.3.2.d requires that at least once every 18 months, during shutdown, a battery capacity test be performed. The GE/BWR-4 Standard Technical Specifications (and the Brunswick TS) permit the licensee the option of performing either (1) a battery service test using actual emergency loads or (2) a service test using dummy (i.e., simulated) emergency loads. The dummy load service test is used to test the Brunswick batteries. The actual loads service test specified in TS 4.8.2.3.2.d.1 is not used for the following reasons:

1. Because of the technical complexity of establishing the actual loss of coolant accident loads to be tested,
2. Because of the difficulty of developing a procedure to use in performing such a test, and
3. Due to the difficulty of performing and monitoring an eight hour test using those actual (not simulated) loads with the unit in the cold shutdown condition.

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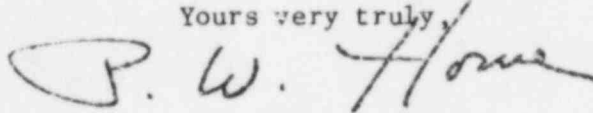
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D. B. Vassallo

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In conclusion, for the above reasons a procedure for performing an actual loads service test has not been developed and is, therefore, not used at the Brunswick Plant. Should you have any questions concerning this letter, please contact our licensing staff.

Yours very truly,

A handwritten signature in dark ink, appearing to read "P. W. Howe". The signature is fluid and cursive, with a large initial "P" and a stylized "H".

P. W. Howe
Vice President
Brunswick Nuclear Project

WRM/ctr (9118WRM)

cc: Mr. D. O. Myers (NRC-BSEP)
Mr. J. P. O'Reilly (NRC-R11)
Mr. M. Grotenhuis (NRC)