



Carolina Power & Light Company
P.O. Box 10429
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JUN 07 1995

SERIAL: BSEP 95-0162

U. S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
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
ASME CODE RELIEF REQUEST
RHR AND FUEL POOL COOLING MANUAL VALVES

Gentlemen:

The purpose of this letter is to request relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, in accordance with 10 CFR 50.55a(g)(6)(i), for the Brunswick Steam Electric Plant, Units 1 and 2. The ASME Code, Section XI, Article I, IV-3400 requires that Category A and B valves be exercised at least once every 3 months. The valves that identified in the relief request are located in an area with a significant background radiation level (approximately 300 person-REM per hour). Implementation of the alternate testing requirements described in the relief request is expected to reduce site personnel exposure by 320 millirem per year. The detailed request for relief is provided in Enclosure 1.

Prompt approval of this relief request is requested in order to minimize further personnel exposure during the performance of these quarterly tests. These tests are next scheduled to be performed beginning approximately July 31, 1995 (Unit 1) and August 23, 1995 (Unit 2).

Please refer any questions regarding this submittal to Mr. George Honma at (910) 457-2741.

Sincerely,

R. P. Lopriore
Manager — Regulatory Affairs
Brunswick Nuclear Plant

WRM/ap

Enclosures

1. Relief Request

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cc: Mr. S. D. Ebner, Regional Administrator, Region II
Mr. D. C. Trimble, NRR Project Manager - Brunswick Units 1 and 2
Mr. C. A. Patterson, NRC Senior Resident Inspector - Brunswick Units 1 and 2
The Honorable H. Wells, Chairman - North Carolina Utilities Commission
Mr. Billy Walker, Assistant Director - Boiler & Pressure Vessel Division

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI
IN-SERVICE TESTING PROGRAM RELIEF REQUEST
RHR AND FUEL POOL COOLING MANUAL VALVES

SYSTEM: Residual Heat Removal (E11) and Fuel Pool Cooling (G41)

COMPONENTS: E11-V40 G41-F004
G41-F016

FUNCTION: These manual valves are ASME Code, Section XI, Category B valves that have an active safety function (required to change position) to provide supplemental cooling to the spent fuel pool.

CATEGORY: B

CLASS: 2 and 3

TEST REQUIREMENT: ASME Boiler and Pressure Vessel Code, Section XI, Article IWB-3400 requires that Category A and B valves be exercised at least once every 3 months.

BASIS FOR RELIEF: As required by ASME Code, Section XI, Article IWB-3400, Carolina Power & Light Company (CP&L) performs a full-stroke exercising of the above identified valves on a quarterly frequency. These manual valves are located in an area with a significant background radiation level (approximately 300 person-REM per hour). Therefore, exercising of these valves create a hardship to CP&L in the area of site personnel exposure.

The alternate testing of these valves is acceptable since the safety function for these valves would only be required when the unit is in Operational Condition 4 (Cold Shutdown) or 5 (Refueling). In accordance with the Brunswick Plant's Updated Final Safety Analysis Report (UFSAR) and Operating Procedures (OP), the supplemental fuel pool cooling safety function of the Residual Heat Removal System can only be employed in Operational Conditions 4 (Cold Shutdown) or 5 (Refueling). As such, operational readiness of these valves need only be verified when the plant is in such operating conditions.

The above referenced valves are not associated with the safety function to use Residual Heat Removal System as the seismic makeup to the Fuel Pool Cooling System. Those valves associated with this safety function are unaffected by this relief request.

ALTERNATE TESTING: Perform full-stroke exercising of the manual valves during cold shutdown.

REFERENCES: UFSAR 5.4.7.2.1.5, 9.1.2
1/2 OP-17, RHR System Valve and Electrical Lineup, Sections 8.9 and 8.10
0AOP-38.0, Loss of Fuel Pool Cooling