



Carolina Power & Light Company

JUN 27 1984

SENT: NLS-84-299

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 & 50-324/LICENSE NOS. DPR-71 & DPR-62
ADDITIONAL INFORMATION CONCERNING REQUEST FOR
SCHEDULAR EXEMPTION TO 10 CFR 50.44(c)(3)(ii)

Dear Mr. Vassallo:

In our letter of June 8, 1984, Carolina Power & Light Company (CP&L) committed to provide a description and schedule for installation of modifications to the instrument air system needed for Brunswick Steam Electric Plant Unit Nos. 1 and 2 to meet the intent of the criteria of Generic Letter 84-09. The purpose of this letter is to provide the schedule for installation of these modifications. The description of the modifications will be provided separately.

As discussed with members of your staff, CP&L is scheduling completion of these modifications for the next refueling outage for each unit. These outages are presently scheduled to begin in March 1985 for Unit 1 (Reload 4) and April 1986 for Unit 2 (Reload 6), and are the next scheduled outages which are of sufficient duration to complete these modifications. This schedule is required in order to allow sufficient time to complete detailed design of the modifications and permit procurement of necessary equipment. These modifications will involve installation of new, and modification of existing, safety class piping and control systems including all the required seismic support and QA of design and installation inherent with such work.

In addition to the measures previously cited in the schedule exemptions granted on June 21, 1983 and December 29, 1983, CP&L has identified two additional measures which may be developed to control accumulation of oxygen inside the containment in the highly unlikely event of a loss-of-coolant accident (LOCA). Following such an accident, once the unit has been brought to a cold shutdown condition, the instrument air system inside containment is no longer required. Further, the capability also exists to supply the entire instrument air system with nitrogen from outside the reactor building. This

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Mr. D. B. Vassallo

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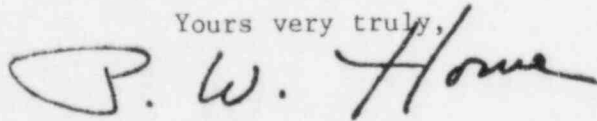
nitrogen would be brought in by tanker truck from off-site and could be made available within two to three days following the accident. Carolina Power & Light Company believes these actions would preclude further introduction of oxygen to the containment well before concentrations could build to combustible levels.

Carolina Power & Light Company believes that these capabilities, combined with our existing containment atmosphere control systems, provide very conservative assurance that concentrations of combustible gases can be maintained well below combustible levels without venting of the containment following a LOCA.

In a letter dated October 11, 1982, CP&L petitioned the Nuclear Regulatory Commission for exemption from the technical requirements of 10 CFR 50.44(c)(3)(ii). Since that time, CP&L has requested, and been granted, exemptions from the schedule requirements of the rule pending Commission approval of its technical exemption request. These extensions have been based in part on the Company's commitment to modify the instrument air system if the Commission ruled favorably on CP&L's technical exemption request. Design, procurement, and installation of these types of modifications are very intensive in terms of resources. It would not have been prudent to proceed with detailed design and installation of such modifications until it had been positively determined that such modifications would be found acceptable to the Commission to meet the requirements of the rule. Carolina Power & Light Company therefore respectfully requests that its request for exemption to the schedule requirements of 10 CFR 50.44(c)(3)(ii) be granted until the next refueling outage, or scheduled outage of sufficient duration after design and procurement is complete, for each of the Brunswick units.

Should you have any further questions regarding this request, please contact Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,



P. W. Howe
Vice President
Brunswick Nuclear Project

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