



Carolina Power & Light Company
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United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REGULATORY GUIDE 1.97 INSTRUMENTATION LABELING

Gentlemen:

The purpose of this letter is to provide a status for Carolina Power & Light Company's (CP&L) reassessment of our labeling position per Regulatory Guide 1.97 "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident." In letters dated September 30, 1983 (Serial: LAP-83-408) and February 1, 1984 (Serial: NLS-84-025), CP&L documented a position on RG 1.97 labeling for the Brunswick Steam Electric Plant, Units 1 and 2. The NRC Safety Evaluation was issued on May 14, 1985, however it did not specifically discuss or acknowledge the exception taken to the labeling convention. CP&L has reassessed our RG 1.97 labeling position and has labeled the more limited set of non-RG 1.97 qualified instruments associated with RG 1.97 parameters. Enclosure 1 provides the details on CP&L position to label the non-RG 1.97 instruments. Enclosure 2 provides a list of regulatory commitments.

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

Sincerely,

G. D. Hicks
Manager - Regulatory Affairs
Brunswick Nuclear Plant

250097

GMT/

Enclosures:

1. Position on RG 1.97 labeling
2. List of Regulatory Commitments

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cc: Mr. S. D. Ebnetter, NRC Regional Administrator, Region II
Mr. D. C. Trimble, Jr., NRR Project Manager - Brunswick Plant
Mr. C. A. Patterson, NRC Senior Resident Inspector - Brunswick Plant
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 NRC DOCKET NOS. 50-325 & 50-324 OPERATING LICENSE NOS. DPR-71 & DPR-62

REGULATORY GUIDE 1.97 INSTRUMENTATION LABELING

In letters dated September 30, 1983 (Serial: LAP-83-408), and February 1, 1984 (Serial: NLS-84-025), Carolina Power & Light Company (CP&L) documented a position on RG 1.97 labeling for the Brunswick Steam Electric Plant, Units 1 and 2. The NRC Safety Evaluation was issued May 14, 1985, however it did not specifically discuss or acknowledge the exception taken to the labeling convention. In August of 1995, the Resident Inspector noted that RG 1.97 instruments in the control room were not specifically identified on the control panels. This is documented in NRC Inspection Report Nos. 50-325/95-19 and 50-324/95-19, dated September 25, 1995, as Unresolved Item 325,324/95-19-01.

A review of RG 1.97 parameters was conducted which documented the limited cases where qualified and non-qualified instruments monitor the same RG 1.97 parameter. The review determined that in the control room there were 38 RG 1.97 qualified instruments versus 12 non-RG 1.97 instruments that also monitor RG 1.97 parameters. Therefore to minimize cluttering the control panels, CP&L chose to label the non-RG 1.97 instruments that monitor RG 1.97 parameters. The following provides the list of non-RG 1.97 instruments which are being labeled:

<u>Parameter</u>	<u>Instrument #</u>	<u>Range</u>
Reactor Pressure Vessel Pressure	C32-PR-R609	800-1100 PSIG
	C32-LPR-R608	0-1500 PSIG
Reactor Pressure Vessel Level	C32-LI-R606A,B,C	150 to 210 "
	C32-LPR-R608	150 to 210 "
	C32-PR-R609	0-210 "
	FW-LIC-3269	150-210"
Suppression Pool Water Level	CAC-LI-4177	-18 to -43"
Drywell Pressure	CAC-PI-2685	0 to 2 PSIG
	CAC-PI-1230	0 to 75 PSIG
Stack Radiation Monitor	D12-RR-R600B	10E+1 to 10E+13 μCU/sec

CP&L is implementing the following position regarding the identification of RG 1.97 instrumentation:

For those cases where the only indications available to the operator for a specific parameter are qualified as RG 1.97 instruments, no special identification of the instrument will be provided.

In those cases where the indication is provided by instruments which are both RG 1.97 qualified and non-RG 1.97 qualified, the indicator which is not RG 1.97 qualified will be specifically identified.

Operators will receive training regarding the significance of using non-qualified Post Accident Monitoring (RG 1.97) instruments.

During the last License Operator Retraining (LOR) cycle, that started in January of 1996, training on RG 1.97 was provided. To support this training and to validate the labeling approach the 12 non-qualified instruments in the site's simulator were labeled. This was followed on February 23, 1996 by installing the labels in the control room.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NOS. DPR-71 & DPR-62

REGULATORY GUIDE 1.97 INSTRUMENTATION LABELING

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Carolina Power & Light Company in this document. Any other actions discussed in the submittal represent intended or planned actions by Carolina Power & Light Company. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Brunswick Nuclear Plant of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage
1. N/A	N/A