



Carolina Power & Light Company

DEC 21 1984

SERIAL: NLS-84-500

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
DEMONSTRATION OF CONTAINMENT PURGE AND VENT VALVE OPERABILITY

Dear Mr. Vassallo:

SUMMARY

By letter dated September 18, 1984, your staff issued their Safety Evaluation Report (SER) concerning containment purge and vent valve operability for the Brunswick Steam Electric Plant Unit Nos. 1 and 2. Carolina Power & Light Company (CP&L) has completed its review of the SER and requests that it be revised as discussed below.

DISCUSSION

Based on analysis performed by POSI-SEAL International, Inc. (provided by letter dated February 29, 1984), CP&L demonstrated operability of the 4 and 8-inch containment purge and vent valves with no physical restriction on the degree of valve opening. The analysis also determined that the 18, 20, and 24-inch valves will properly function during a combined LOCA and seismic event with the valve opening limited to 50 degrees or less. Though the SER discussed the larger valves, it did not address the study's findings regarding the 4 and 8 inch valves. We request that the SER be revised to permit re-energizing the 4-inch valves and removal of the mechanical limits on the 8-inch valve.

In addition, CP&L was requested to submit appropriate Technical Specifications which reflect the limitation of opening angle for the involved valves. It is believed that such a revision to the Technical Specifications is unwarranted and inconsistent with ongoing programs to simplify and improve the Technical Specifications. Limitation of containment purge and vent valve opening is considered a design feature and will be incorporated into the FSAR with appropriate bases. The design of the mechanical stops (see Figure 1 attached) is a stud threaded through the valve and locked in place with a lock nut such that the setting will not change, therefore, placing surveillance requirements on the containment purge and vent valves would serve no useful purpose. In addition, some valves are inaccessible during power operation or are located in high radiation areas. Unnecessary entry of these areas is not consistent with the corporate ALARA guidelines.

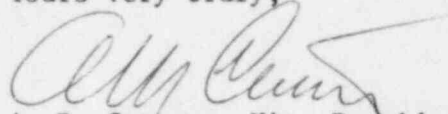
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CONCLUSION

Based on the above discussion, Carolina Power & Light Company requests that the SER issued September 18, 1984 be revised to permit re-energizing the 4-inch valves (CAC-V49 and CAC-V50) and to allow removal of the mechanical limit on the 8-inch valve (CAC-V4). Also, the Company commits to reflect the limitation of opening angle for the 18, 20, and 24-inch containment purge and vent valves in the next amendment to the Brunswick Updated FSAR in lieu of submitting a technical specification amendment request.

Should you have any questions concerning this submittal, please contact Mr. Sherwood R. Zimmerman at (919) 836-6242.

Yours very truly,



A. B. Cutter - Vice President
Nuclear Engineering & Licensing

MAT/pgp (907MAT)

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

Mechanical Stop
for
Restricting Valve Opening

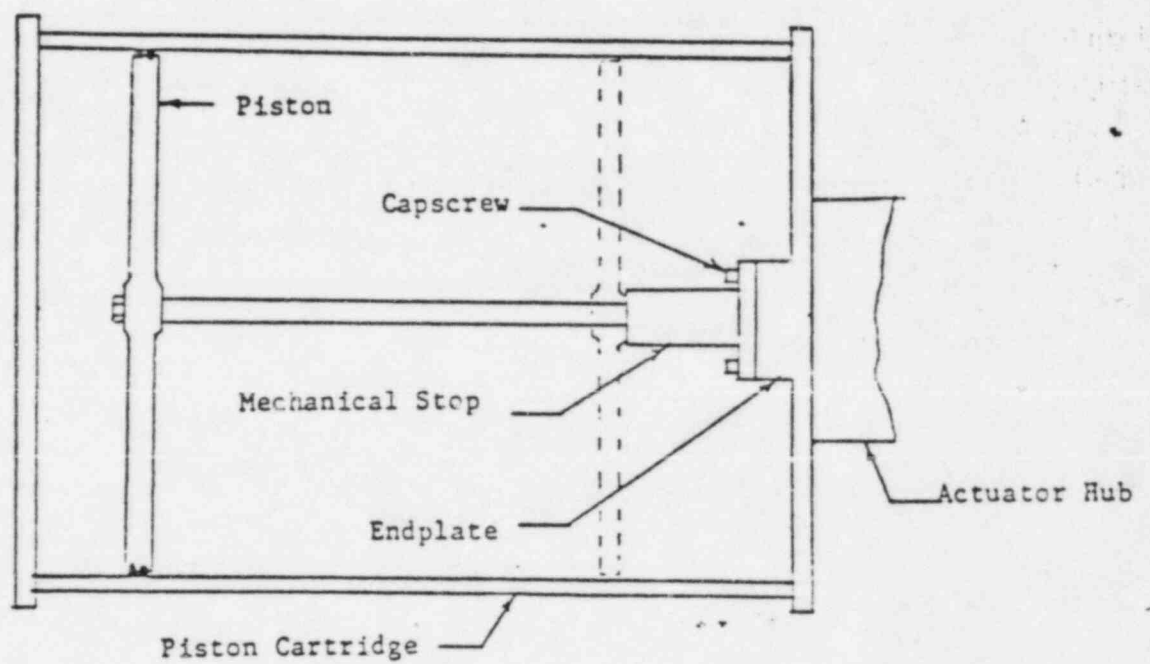


FIGURE 1