



Carolina Power & Light Company

MAR 06 1985

SERIAL: NLS-85-527

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  
REQUEST FOR LICENSE AMENDMENT  
SUPPRESSION POOL TEMPERATURE MONITORING SYSTEM

Dear Mr. Vassallo:

### SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. The proposed revisions to the Brunswick-1 TS Tables 3.3.5.3-1 and 4.3.5.3-1 (Accident Monitoring Instrumentation) and Section 3/4.6.2.1 (Suppression Chamber) incorporate the inclusion of a suppression pool temperature monitoring system to meet the acceptance criteria of NUREG-0661, Appendix A. In addition, the channel check for Item 4.3.5.3-1.4 is being changed from monthly to daily to provide consistency with TS 4.6.2.1.d.1. Further, TS Sections 3/4.6.2.1 and 3/4.6.4.1 (Drywell-Suppression Chamber Vacuum Breakers) have been modified to more closely conform to the guidance of the GE BWR/4 Standard Technical Specifications (STS). A similar revision was issued for Brunswick-2 on September 22, 1984. Brunswick-2 Surveillance Requirement 4.6.2.1.b.2.b is also being revised at this time to eliminate redundancy.

### DISCUSSION

The requested TS change reflects the new suppression pool temperature monitoring system that will be installed on Brunswick-1 during the upcoming refueling outage. This system consists of 24 Class 1E resistance temperature detectors (RTDs) installed about the torus at designated locations to provide accurate measurement of the average pool water temperature. These new RTDs are split into two independent channels consisting of 12 RTDs per channel. The new RTDs are Class 1E qualified, seismically analyzed, and the two suppression pool temperature monitoring divisions meet the acceptance criteria of Regulatory Guide 1.97, NUREG-0661, and NUREG-0783. The new suppression pool temperature monitoring system also serves as the accident monitoring instrumentation for suppression chamber water temperature. Tables 3.3.5.3-1 and 4.3.5.3-1 have been changed to reflect the new instrument numbers. In addition, the channel check for Item 4.3.5.3-1.4 is currently performed on a monthly basis. This requirement is being changed to daily in order to be consistent with TS 4.6.2.1.d.1. A similar change is being made in the Brunswick-2 TS to provide consistency. Further, a footnote has been added in Table 3.3.5.3-1 to ensure that the dual function of the system is readily apparent to operations personnel.

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The submittal of these changes has provided this opportunity to reformat TS Section 3/4.6.2 in order to make the section more closely conform to the format of the GE BWR/4 STS. A Limiting Condition for Operation (LCO) and new action items have been added to ensure appropriate requirements exist for various plant conditions. The LCO and Surveillance Requirements pertaining to suppression chamber leakage have been moved from Section 3/4.6.4 to Section 3/4.6.2, consistent with guidance of the GE BWR/4 STS.

Surveillance Requirement 4.6.2.1.b.2.b contains a 24-hour time restriction for suppression chamber temperature in excess of 95°F while in Operating Conditions 1 and 2. This requirement is also covered by TS Section 3/4.6.2, Action Statement b. CP&L believes that restating the 24-hour restriction is redundant and may mislead the operator. Therefore, we have removed the time restriction from Surveillance Requirement 4.6.2.1.b.2.b in the Brunswick-2 TS. Detailed descriptions of all changes are provided in the summary lists of revisions included with the proposed TS pages as Attachment 1 and Attachment 2.

#### SIGNIFICANT HAZARDS ANALYSIS

The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards consideration by providing certain examples published in Federal Register on April 6, 1983 (48 FR 14864). Examples of an amendment likely to involve no significant hazards consideration include: i) a purely administrative change, and ii) a change that constitutes an additional limitation, restriction, or control not presently included in the TS. The new suppression pool temperature monitoring system/accident monitoring instrumentation is subject to LCOs, actions, and surveillances specified in Section 3/4.6.2 during normal operation which were not previously required and, therefore, constitute additional limitations. Similarly, revision of channel check 4.3.5.3-1.4 from monthly to daily also provides additional limitations. The reformatting of Sections 3/4.6.2 and 3/4.6.4 and the changing of instrument numbers in Tables 3.3.5.3-1 and 4.3.5.3-1 represent administrative changes. Since the proposed amendment involves only the addition of new limiting conditions for operation and various administrative changes, operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As such, CP&L believes this amendment involves no significant hazards consideration.

Mr. D. B. Vassallo  
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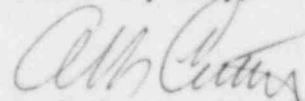
ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 and Brunswick-2 TS pages are included in Enclosure 1 and Enclosure 2 along with a complete summary of the changes made to each page.

Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10 CFR 170.12 and has determined that an application fee is required at this time. A check for \$150 is enclosed in payment of this fee.

Since these modifications will be made during the upcoming Brunswick-1 refueling outage, issuance of this amendment is required by September 1, 1985 to support start-up. 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

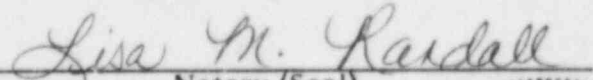
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Enclosures

cc: Dr. J. Nelson Grace (NRC-R11)  
Mr. D. O. Myers (NRC-BNP)  
Mr. M. Grotenhuis (NRC)

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

My commission expires: 5/18/88

  
Notary (Seal)

