



Carolina Power & Light Company

MAR 18 1985

SERIAL: NLS-85-010

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 NO. 1  
DOCKET NO. 50-325/LICENSE NO. DPR-71  
REQUEST FOR LICENSE AMENDMENT  
NUREG-0737, ITEM II.K.3.18, "ADS LOGIC MODIFICATIONS"

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 No. 1 (Brunswick-1). The proposed revision to TS Tables 3.3.3-1, 3.3.3-2, and 4.3.3-1 reflects modifications to the Automatic Depressurization System (ADS) by removing the high pressure trip from the logic sequence and adding a manual inhibit switch thus eliminating the need for manual actuation to ensure core coverage.

#### DISCUSSION

The requested TS change removes the ADS high drywell pressure instruments and adds manual inhibit switches to ADS logic in TS 3.3.3 and 4.3.3. A BWROG study of alternatives to the present ADS actuation logic identified modifications to eliminate the need for manual actuation to ensure core coverage in the event of certain accident sequences. The proposed TS change is the second option outlined in the BWROG study and is one of the two options indicated to be acceptable by NRC letter dated June 3, 1983. The proposed reduction of logic devices will increase ADS reliability and will provide additional assurance of adequate core cooling by further automating reactor pressure vessel depressurization for isolations and stuck open relief valve events, while satisfying design concerns associated with anticipated transients without scram.

#### SIGNIFICANT HAZARDS ANALYSIS

The proposed amendment provides additional assurance of adequate core cooling by extending the operation of the ADS to encompass additional accident and transient conditions which do not directly produce a high drywell pressure signal. Therefore, CP&L believes that the amendment does not: (1) involve a significant increase in the

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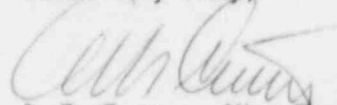
probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As such, this revision involves no significant hazards consideration.

ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 TS pages are provided in Enclosure 1. Carolina Power & Light Company has evaluated this request in accordance with the provision of 10CFR170.12 and has determined that a license amendment application fee is required. A check for \$150.00 is enclosed in payment of this fee.

Since these modifications will be carried out during the upcoming Brunswick 1 refueling outage, issuance of this amendment is required by September 1, 1985 to support Brunswick 1 startup. Should you have any questions concerning this submittal, please contact Mr. Sherwood R. Zimmerman at (919) 836-6242.

Yours very truly,



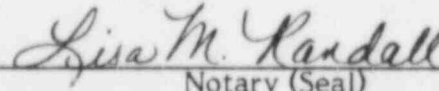
A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

HMS/cc (1038NLU)

Enclosures

cc: Mr. L. W. Garner (NRC-BNP)  
Mr. J. P. O'Reilly (NRC-RII)  
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.



Notary (Seal)

My commission expires: 5/18/88

