



Carolina Power & Light Company

SERIAL: NLS-85-079

MAY 02 1985

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
IN-SERVICE INSPECTION - ASME CODE RELIEF REQUEST

Dear Mr. Vassallo:

SUMMARY

Carolina Power & Light Company (CP&L) currently performs In-Service Inspections at the Brunswick Steam Electric Plant Unit Nos. 1 and 2 in accordance with the 1977 edition through the summer of 1978 addenda of the ASME Boiler and Pressure Vessel Code, Section XI. The Code of Federal Regulations, Title 10, Part 50.55a grants a licensee the right to request relief from requirements of the ASME code when the licensee has determined that these requirements are impractical. The purpose of this letter is to request relief from exercising and leak rate tests for certain Category A, C valves. A detailed description of the relief request, alternate testing, and justification follows.

RELIEF REQUEST

Relief is requested from the valve exercising and leak rate tests for the Reactor Instrumentation Protection (RIP) and the excess flow check valves on instrumentation lines penetrating the primary containment. These valves are classified by the ASME code article IWV-2000 as Category A, C. As Category A, C, these valves are required to be exercised at least once every 3 months and to be leak rate tested not less than once every two years. (See ASME Code Articles IWV-3411, IWV-3422, and IWV-3521).

ALTERNATE TESTING

In lieu of the testing requirements described above, CP&L proposes to perform functional testing to verify operability of the applicable valves every 18 months in accordance with the Brunswick Technical Specification Surveillance Requirement No. 4.6.3.4.

JUSTIFICATION

The subject valves are installed on instrument lines penetrating the primary containment and are designed to close on a line break downstream of the valves (i.e., a line break outside containment). Instrument lines are sized and/or orificed in accordance with

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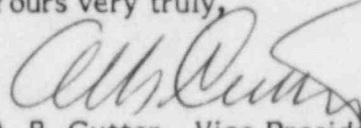
Mr. D. B. Vassallo
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Regulatory Guide 1.11 such that in the event of a rupture, offsite doses will be substantially below the guidelines of 10 CFR 100. Standard Review Plan Section 6.2.6 states, "Leak testing of instrumentation lines that penetrate containment may be done in conjunction with either the local leak rate tests or the containment integrated leak rate test." Brunswick satisfies this leak testing requirement during the containment integrated leak rate test. More frequent testing of these valves would unnecessarily interfere with their associated instruments which are used to monitor plant parameters during normal operations.

Carolina Power & Light Company has reviewed this request in accordance with 10CFR170.12, and a check for \$150 in payment of the required fee is enclosed.

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

Yours very truly,


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

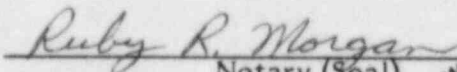
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Enclosure

cc: Mr. L. W. Garner (NRC-BNP)
Dr. J. Nelson Grace (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.

My commission expires: 11/27/89


Notary (Seal)

