



Carolina Power & Light Company

SERIAL: NLS-85-046

MAY 06 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
REQUEST FOR LICENSE AMENDMENT
TURBINE STOP VALVES

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 change adds a footnote to Items 9 and 10 of Table 4.3.1-1 to indicate that surveillance is not required when thermal power is below 30% of rated thermal power.

DISCUSSION

Currently, Table 3.3.1-1 indicates that the Turbine Stop Valve - Closure and the Turbine Control Valve Fast Closure, Control Oil Pressure - Low functions (Items 9 and 10 of Table 4.3.1-1) are bypassed when thermal power is less than 30% of rated thermal power. The proposed amendment revises Table 4.3.1-1 to be consistent with Table 3.3.1-1 by adding a footnote to indicate that surveillance is not required when thermal power is less than 30% of rated thermal power.

In order to perform the surveillances required below 30% of rated thermal power, the mode switch must be bypassed to allow the valves to open. Such a bypass requires extensive use of jumpers. Eliminating the surveillance requirements below 30% of rated thermal power avoids the need to test with the jumpers and decreases the possibility of an operator induced malfunction.

SIGNIFICANT HAZARDS

The Company has reviewed this request and determined that the proposed amendment does not increase the probability or consequences of an accident previously evaluated, or create the possibility of a new accident because there is no physical alteration of the plant configuration or changes to setpoints or operating parameters. The change merely removes surveillance requirements on the turbine stop valves when they are bypassed. Since removing these surveillance requirements obviates the need for extensive use of

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jumpers required to perform them with the valves bypassed, the chances of operator induced malfunction is reduced thereby increasing the margin of safety. Based on the above reasoning, CP&L has determined that operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequence of an accident previously evaluated; (2) create 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 amendment involves no significant hazards consideration.

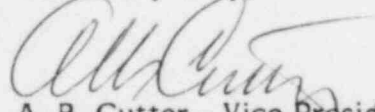
ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 and Brunswick-2 TS pages are provided in Enclosures 1 and 2.

Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10 CFR 170.12 and has determined that a license amendment application fee is required. A check for \$150.00 is enclosed in payment of this fee.

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

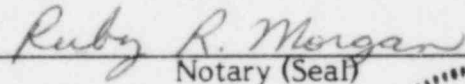
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Enclosures

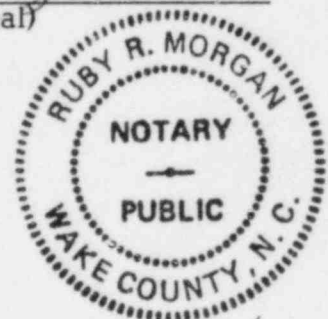
cc: Mr. L. W. Garner (NRC-BNP)
Dr. J. Nelson Grace (NRC-R11)
Mr. M. Grotenhuis (NRC)

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)



ENCLOSURE 1

PROPOSED CHANGE TO BRUNSWICK-1
SPECIFICATION 3/4 3.1
TURBINE STOP VALVES
(84TSB24)

<u>PAGE</u>	<u>DESCRIPTION OF CHANGE</u>
3/4 3-8	Items 9 and 10 - Add footnote (m) to Operational Conditions.
3/4 3-8a	Insert footnote (m) - "Surveillance is not required when THERMAL POWER is less than 30% of RATED THERMAL POWER."