



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 11, 1993

Docket Nos. 50-325
and 50-324

Mr. R. A. Watson
Senior Vice President
Nuclear Generation
Carolina Power & Light Company
Post Office Box 1551
Kaleigh, North Carolina 27602

Dear Mr. Watson:

SUBJECT: REQUEST FOR RELIEF FROM CERTAIN INSERVICE TESTING PROGRAM
REQUIREMENTS FOR SEVERAL PUMPS AND VALVES - BRUNSWICK STEAM ELECTRIC
PLANT, UNITS 1 AND 2 (TAC NOS. M84497 and M84498)

By letter dated September 15, 1992, Carolina Power & Light Company (CP&L) submitted several Inservice Testing (IST) Program relief requests for Brunswick Steam Electric Plant, Units 1 and 2 (Brunswick). Pump-related relief requests are PR-06 and PR-07 and valve-related relief requests are VR-32, VR-33, VR-34, VR-35, VR-36, and VR-37. These relief requests are all for the second ten-year interval IST Program for Brunswick.

The Code of Federal Regulations in 10 CFR 50.55a requires that the IST of certain American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda, except where relief has been granted or proposed alternatives have been authorized by the Commission. Guidance on acceptable alternatives to Section XI requirements was provided in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," for certain aspects of IST.

In evaluating your requests for relief from the requirements of Section XI, the staff considered (1) the acceptability of proposed alternative testing, (2) whether the hardship of compliance is without a compensating increase in safety, and (3) the impracticality of performing the required testing considering the burden if the requirements were imposed. For the relief granted per Generic Letter (GL) 89-04, pursuant to 10 CFR 50.55a(f)(6)(i) (previously (g)(6)(i) when granted per GL 89-04), the staff has determined that granting relief is authorized by law and will not endanger life or property, or the common defense and security, and is otherwise in the public interest. The granting of relief or authorization of proposed alternatives is based upon the fulfillment of any commitments made by you in your basis for each relief request and the proposed alternate testing.

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The enclosed Safety Evaluation provides the results of the staff's review of these relief requests. Use of a later edition of the ASME Code is approved for PR-06 and PR-07 pursuant to 10 CFR 50.55a(f)(4)(iv) (previously 50.55a(g)(4)(iv)). In that you are following the guidance as specified in GL 89-04, relief is granted for VR-33, VR-35, and VR-36 pursuant to 10 CFR 50.55a(f)(6)(i) and no further evaluation is required. Testing in accordance with the requirements of subsequent editions and addenda, as incorporated by reference to 10 CFR 50.55a(b), subject to the limitations and modifications listed, is approved for VR-33, VR-34, VR-35, VR-36 and VR-37 pursuant to 10 CFR 50.55a(f)(4)(iv) (previously 50.55a(g)(4)(iv)). Specific relief from the Code is not required for VR-32 since the testing requirements are satisfied by normal operation.

By this letter, the staff considers the above request to be complete and no further action is required. If you have any questions, please contact the Brunswick project manager at (301) 504-1457.

Sincerely,

Original signed by:

Jocelyn A. Mitchell, Acting Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc: See next page

DISTRIBUTION:

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G. Lainas 14-H-3

E. Adensam
P. Milano
C. E. Carpenter
P. Anderson
OGC
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OC/LFDCB
ACRS (10)

E. Jordan MNBB 3701
E. Rossi 9-A-2
B. Grimes 11-E-4
J. Lieberman 7-H-5
G. Hill (4) PI-37
L. Plisco, EDO 17-G-21
E. Merschoff, R-II

*SEE PREVIOUS CONCURRENCE

OFC	LA:PD21:DRPE	PE:PD21:DRPE	PM:PD21:DRPE	*OGC	D:PD21:DRPE
NAME	PAnderson	CCarpenter:tmw	PDMilano <i>CC</i>	RBachmann	JAMitchell
DATE	02/11/93	02/11/93 <i>CC</i>	02/11/93 <i>for</i>	02/09/93	02/11/93

Docket Name: BRN84497.LTR

Mr. R. A. Watson

- 2 -

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NAME	PAnderson	CCarpenter:tmw	PDMilano <i>Col</i>	RBachmann	JAMitchell
DATE	02/11/93	02/11/93 <i>Col</i>	02/11/93 <i>for</i>	02/09/93	02/11/93

Docket Name: BRN84497.LTR

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Carolina Power & Light Company

Brunswick Steam Electric Plant
Units 1 and 2

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