



Carolina Power & Light Company

SERIAL: NLS-85-516

JUN 28 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
DIESEL GENERATOR OPERABILITY

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, Units 1 and 2. The proposed TS will revise the action statements of TS 3.8.1.1 relative to diesel generator surveillance testing.

DISCUSSION

On July 16, 1984, the NRC issued Generic Letter No. 84-15 entitled "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability". The generic letter requested licensees to review the reliability of their diesel generators based on surveillance test data, to review their programs concerning diesel generator surveillance testing, and to describe their plans for attaining and maintaining certain diesel generator reliability goals. By letter dated October 5, 1984, CP&L responded to the Generic Letter by providing the requested information. Carolina Power & Light Company evaluated one topic of the generic letter, the reduction of diesel generator fast starts, and determined that Technical Specification revisions to address the issue were desirable.

The enclosed Technical Specification changes are the result of a probabilistic risk assessment of the Brunswick diesel generator system. The purpose of the PRA study was to investigate the impact of extending the allowed diesel generator out-of-service time from three days to seven days and the impact of extending the interval between diesel generator fast starts from 12 hours to 72 hours. In addition, the study allows for an

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increase from 2 to 24 hours to commence diesel fast starting and loading with either an inoperable diesel generator or an inoperable offsite source. This is consistent with guidance provided in Generic Letter 84-15. A copy of the final study is enclosed in support of the proposed Technical Specification changes.

The enclosed Technical Specification changes are based on the model Standard Technical Specifications provided as Appendix A to Generic Letter 84-15, but have been revised to reflect the conclusions of the Brunswick diesel generator PRA study relative to diesel generator fast start and allowed outage time requirements. These changes include the establishment of a 7-day versus 3-day allowed outage period for one diesel generator or one off-site circuit being out-of-service, and a 72-hour versus 12-hour frequency for performing Surveillance Requirement 4.8.1.1.2.a.4 (diesel fast start) commencing 24 hours rather than 2 hours after entering the limiting condition for operation with an offsite circuit or diesel generator inoperable. In addition, performance of Surveillance Requirement 4.8.1.1.2.a.5 (diesel loading) is now required each time Surveillance Requirement 4.8.1.1.2.a.4 is performed.

SIGNIFICANT HAZARDS

The proposed revisions to TS Sections 3.8.1.1 are intended to increase the overall reliability of the diesel generators. Reducing the number of diesel generator fast starts and extending the allowed outage period for one diesel or one off-site circuit does not necessitate physical alteration of the plant or changes in parameters governing normal plant operation. Therefore, the proposed amendment does not create the possibility of a new accident nor does it increase the probability or consequences of a previously evaluated accident. The results of the Brunswick diesel generator study demonstrate that there is no significant reduction in a margin of safety. Based on the above, CP&L has determined that operation of the facility in accordance with the proposed revision does 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 an accident previously evaluated; or 3) involve a significant reduction in a margin of safety. As such, this amendment involves no significant hazards consideration.

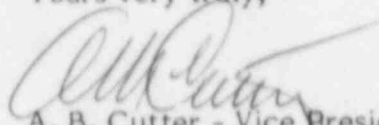
ADMINISTRATIVE INFORMATION

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 10CFR170.12 and has determined that a license amendment application fee is required. A check for \$150 is enclosed as payment of this fee.

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

Yours very truly,



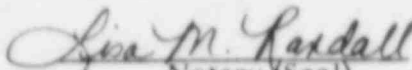
A. B. Cutter - Vice President
Nuclear Engineering & Licensing

ABC/WRM/ccc (965MAT)

Enclosures

cc: Mr. W. H. Ruland (NRC-BNP)
Dr. J. Nelson Grace (NRC-RII)
Mr. M. Grotenhuis (NRC)
Mr. Dayne H. Brown

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

