



Carolina Power & Light Company

JUL 01 1985

SERIAL: NLS-85-143

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
REACTOR PROTECTION SYSTEM AND CONTROL ROD BLOCK INSTRUMENTATION

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 (BSEP), Unit Nos. 1 and 2. The proposed revision affects the surveillance requirements for the Reactor Protection System Instrumentation and the Control Rod Withdrawal Block Instrumentation as given in Tables 4.3.1-1 and 4.3.4-1 of the Brunswick-1 and Brunswick-2 TS.

DISCUSSION

At specified intervals and/or prior to each reactor startup, the monitors associated with the Control Rod Withdrawal Block and the Reactor Protection System are required to have channel functional tests performed. However, when the Reactor Mode Switch (RMS) is in the shutdown position, existing circuitry in the RMS prohibits testing of some of these instruments. In order to perform the channel functional test on these instruments without excessive circuit jumping, this TS change would allow the RMS to be temporarily placed in a position other than that corresponding to the actual plant Operational Condition (OC). It should be noted that no change in the actual plant operational condition will occur, only a change in the position of the RMS. Instruments affected by these proposed changes are identified as Items 2.a and 2.b of TS Table 4.3.1-1 and Items 1.b, 1.d, and 4.a of TS Table 4.3.4-1.

A similar condition exists for other instruments associated with the Control Rod Block and Reactor Protection System when the plant is in OC 1 (Run). Section 4.0.4 of the TS prohibits entry into an operational condition unless all Surveillance Requirements associated with the Limiting Conditions of Operation applicable to the OC to be entered have been performed within the applicable surveillance interval or as otherwise specified. Therefore, in order to enter OC 2 (Startup/Hot Standby) from OC 1, the surveillance tests required for OC 2 must be performed. However, the channel functional test circuitry of some instrumentation is bypassed when the RMS is in the Run

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position, thereby prohibiting performance of the channel functional test. The proposed TS change would allow for performance of the required surveillance test to be completed within twelve hours of entering OC 2 from OC 1 for the affected instruments. Instruments affected by this change are identified as Items 1.a and 1.b of TS Table 4.3.1-1 and Items 1.d, 3.a, 3.b, 3.c, and 3.d of TS Table 4.3.4-1.

In addition to the changes described above, a weekly channel functional test is added to the Neutron Flux-High trip function of the Intermediate Range Monitors (IRM) during operational condition 2 (Item 1.a, Table 4.3.1-1). This ensures that the trip function is periodically tested during extended unit operation in OC 2 (greater than 7 days). This surveillance requirement is currently in effect for the IRM inoperative trip function and is consistent with the General Electric Standard Technical Specifications BWR/4.

SIGNIFICANT HAZARDS ANALYSIS

The Company has reviewed this request and determined that the proposed amendment does not increase the probability or consequences of an accident previously evaluated as there is no physical alteration of the plant configuration or changes to setpoints or operating parameters. The operational condition of the plant is based on RMS position and average reactor coolant temperature. The RMS position controls only the logic circuitry of the plant; none of the other parameters dictating an OC will be varied when performing the required channel functional test.

The Company's review also verified that the proposed amendment does not create the possibility of a new accident because the control rods will be fully inserted and remain so until all Limiting Conditions for Operation are met for the performance of required surveillance during Startup/Hot Standby, Shutdown or Refueling modes. Also, performing a channel functional test in the actual logic configuration in which the component will be required during the surveillance addressed by this request is preferable to the extensive use of jumpers currently employed to accomplish the channel functional test.

The addition of footnote (d) to Items 1.a and 1.b of Table 4.3.1-1 and to Items 1.d, 3.a, 3.b, 3.c, and 3.d of Table 4.3.4-1 allows for performance of the required surveillance within twelve hours of entering OC 2 from OC 1. This change is consistent with existing allowances for the APRMs and IRMs in the respective tables and does not constitute a significant change in a margin of safety.

Carolina Power & Light has reviewed this request and has determined that operation of the facility in accordance with the proposed amendment would 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 any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Therefore, this request involves no significant hazards consideration.

ADMINISTRATIVE INFORMATION

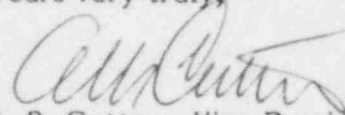
The proposed TS pages as well as a summary sheet detailing all changes (including minor administrative changes) for Brunswick-1 are provided in Enclosure 1 and those of Brunswick-2 are provided in Enclosure 2. Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10 CFR 170.12 and has determined that a license amendment application fee is required. A check for \$150 is enclosed in payment of this license amendment fee.

Mr. D. B. Vassallo

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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

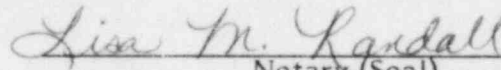
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Enclosures

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

My commission expires: 5/18/88


Notary (Seal)

