



Carolina Power & Light Company
AUG 28 1985

SERIAL: NLS-85-066

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
SEALED SOURCE CONTAMINATION

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 amendment revises TS Bases 3/4.7.6 to include sealed sources which are continuously enclosed within a shielded mechanism.

DISCUSSION

Technical Specification 3/4.7.6, "Sealed Source Contamination," discusses the limitations on sealed source removable contamination to ensure that leakage from these sources does not exceed allowable intake values for personnel. The present wording of this TS is almost identical to the wording of the GE BWR/4 Standard Technical Specifications (STS) and moreover the intent is the same. However, the current bases for TS 3/4.7.6 are different from the STS and omit the discussion regarding the applicability of the TS to sealed sources which are continuously enclosed within a shielded mechanism.

The proposed amendment revises TS Bases 3/4.7.6 to be consistent with the STS Bases 3/4.7.6. Sealed sources which are continuously enclosed within a shielded mechanism are considered to be stored and need not be tested unless they are removed from the shielded mechanism. Past experience of the plant coincides with the recommended guidance provided in the STS; leak testing of these specially enclosed and shielded sources is not required. Therefore, the proposed amendment does not significantly effect the margin of safety.

SIGNIFICANT HAZARDS ANALYSIS

The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if 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. Carolina Power & Light Company has determined that the requested amendment per 10 CFR 50.92:

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- (1) Does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed rewording of TS Bases 3/4.7.6 does not effect the function, operation or failure modes of any system as described in the FSAR. Also, the proposed revision does not necessitate any changes to TS 3/4.7.6.
- (2) Does not create the possibility of a new or different kind of accident than previously evaluated for the same reasons as already given in item (1) above.
- (3) Does not involve a significant reduction in a margin of safety. The proposed revision changes TS Bases 3/4.7.6 to be consistent with the intent of TS 3/4.7.6 by specifically addressing leak testing for those sources which are continuously enclosed within a shielded mechanism; this change is also consistent with the GE STS Bases. For this reason and those given in item (1) above, the margin of safety is not significantly reduced.

Based on the above, CP&L has determined that the proposed change meets the criteria of 10 CFR 50.92(c) and, therefore, does not involve significant hazards consideration.

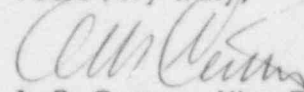
ADMINISTRATIVE INFORMATION

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 an application fee is required at this time. 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. Zimnerman at (919) 836-6242.

Yours very truly,



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

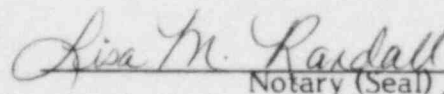
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Enclosures

cc: Mr. W. H. Ruland (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: 5/18/88


Notary (Seal)

