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SERIAL: BSEP 97-0125
10 CFR 50.90
TSC 97TSB05

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR EMERGENCY/EXIGENT LICENSE AMENDMENTS
INSTRUMENTATION RESPONSE TIME TESTING

Gentlemen:

By letter dated March 24, 1997 (Serial: BSEP 97-0120), Carolina Power & Light (CP&L) Company requested a revision to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendments would revise the definitions for EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME, ISOLATION SYSTEM RESPONSE TIME, and REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME.

On March 25, 1997, a telephone conference was held between the NRC staff and CP&L to discuss revisions to the proposed Technical Specification changes. Rather than the proposed revisions to the Technical Specification definitions, the NRC staff requested changes be incorporated into the surveillances for Reactor Protection System and Isolation System response time testing. In addition, the current surveillance of ECCS response time in Technical Specification 3/4.3.3 will be deleted and replaced with individual system response time surveillance requirements for the High Pressure Coolant Injection System, the Core Spray System, and the Low Pressure Coolant Injection System. Based on these recommendations, CP&L is submitting a revised request for license amendment. This request supersedes our request dated March 24, 1997.

The NRC staff also requested additional information regarding CP&L's compliance with the recommendations of EPRI NP-7243, "Investigation of Response Time Testing Requirements." In the December 28, 1994, acceptance of NEDO-32291, the NRC specified that licensees must follow the recommendations of EPRI NP-7243. CP&L has reviewed these recommendations and determined that they have been properly implemented at BSEP. A more detailed discussion of each recommendation is included in Enclosure 1.

This license amendment request continues to meet the requirements of 10 CFR 50.91 for both emergency and exigent processing because failure to act before the discretionary enforcement expires would result in an unnecessary shutdown of BSEP Unit Nos. 1 and 2. Additionally, the proposed amendments do not involve a significant hazards consideration. Therefore, CP&L continues to request emergency or exigent processing of this license amendment request.

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Carolina Power & Light Company is providing, in accordance with 10 CFR 50.91(b), Mr. Mel Fry of the State of North Carolina with a copy of the proposed license amendments.

Please refer any questions regarding this submittal to Mr. Keith Jury, Manager - Regulatory Affairs, at (910) 457-2783.

Sincerely,



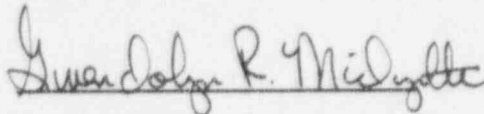
William R. Campbell

WRM/wrm

Enclosures:

1. Bases for Change Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Marked-up Technical Specification; Pages - Unit 1
6. Marked-up Technical Specification Pages - Unit 2
7. Typed Technical Specification Pages - Unit 1
8. Typed Technical Specification Pages - Unit 2

William R. Campbell, 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, and agents of Carolina Power & Light Company.



Notary (Seal)

My commission expires: *Dec 12, 2001*

pc (with enclosures):

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The Honorable J. A. Sanford
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ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 NRC DOCKET NOS. 50-325 AND 50-324 OPERATING LICENSE NOS. DPR-71 AND DPR-62 REQUEST FOR EMERGENCY/EXIGENT LICENSE AMENDMENTS INSTRUMENTATION RESPONSE TIME TESTING

BASES FOR CHANGES

SUMMARY

This license amendment request is associated with a request for enforcement discretion for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, submitted on March 22, 1997 (Serial: BSEP 97-0119). The enforcement discretion was requested in order to permit continued operation without completion of instrumentation response time testing, as currently defined in the Technical Specifications, for the Reactor Protection System (RPS), Emergency Core Cooling System (ECCS), and Isolation System actuation instrumentation. Carolina Power & Light (CP&L) Company determined that these instruments were inoperable because response time surveillance testing, required by Technical Specifications 4.3.1.3, 4.3.2.3, and 4.3.3.3, has not been performed in accordance with the instrumentation response time testing definitions contained in Section 1.0 of the BSEP Technical Specifications. Enforcement discretion was verbally granted by the NRC staff at 2136 Eastern Standard Time (EST) on March 21, 1997, in a telephone conference with the NRC.

SUMMARY OF TECHNICAL SPECIFICATION REVISIONS

Technical Specification 4.3.1.3 (Reactor Protection System Instrumentation)

Technical Specification 4.3.1.3 states the following:

The REACTOR PROTECTION SYSTEM RESPONSE TIME of each reactor trip function[#] shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip function.

[#] Neutron detectors are exempt from response time testing.

The footnote to Technical Specification 4.3.1.3 is being revised as follows:

[#] Neutron detectors are exempt from response time testing. The sensor response times for the following functions may be assumed to be the design sensor response time:

- Item 3, "Reactor Vessel Steam Dome Pressure - High"
- Item 4, "Reactor Vessel Water Level - Low, Level 1"

Table 2 of NEDO-32291-A indicates that response time testing can be eliminated for sensors associated with the Reactor Vessel Water Level - Low, Level 3 actuation for the RPS. The reactor vessel water level nomenclature used by BSEP Unit Nos. 1 and 2 differs from that typically used for other boiling water reactors (BWRs). The BWR industry reference of Reactor Vessel Water Level - Low, Level 1 is the same as the BSEP designation of Reactor Vessel Water Level - Low, Level 3. The BWR industry reference of Reactor Vessel Water Level - Low, Level 2 is the same for BSEP. The BWR industry reference of Reactor Vessel Water Level - Low, Level 3 is the same as the BSEP designation of Reactor Vessel Water Level - Low, Level 1. Thus, the Reactor Vessel Water Level - Low, level 1 reference provided in the notation above for Technical Specification 4.3.1.3 is equivalent to Reactor Vessel Water Level - Low, Level 3 used in Table 2 of NEDO-32291-A.

Technical Specification 4.3.2.3 (Isolation Actuation Instrumentation)

Technical Specification 4.3.2.3 states the following:

The ISOLATION SYSTEM RESPONSE TIME of each isolation function[#] shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific isolation function.

[#] Radiation monitors are exempt from response time testing.

The BSEP Unit No. 1 footnote to Technical Specification 4.3.2.3 is being revised as follows:

[#] Radiation monitors are exempt from response time testing. The sensor response times for the following functions may be assumed to be the design sensor response time:

- Item 1.a.2, "Reactor Vessel Water Level - Low, Level 3"
- Item 1.c, "Main Steam Line Flow - High"

The BSEP Unit No. 2 footnote to Technical Specification 4.3.2.3 is being revised as follows:

[#] Radiation monitors are exempt from response time testing. The sensor response times for the following functions may be assumed to be the design sensor response time:

- Item 1.a.2, "Reactor Vessel Water Level - Low, Level 3"
- Item 1.c.3, "Main Steam Line Flow - High"
- Item 1.c.4, "Main Steam Line Flow - High"

Table 2 of NEDO-32291-A indicates that response time testing can be eliminated for sensors associated with the Reactor Vessel Water Level - Low, Level 1 or Reactor Vessel Water Level - Low, Level 2 actuations for main steam line isolation valve (MSIV) closure (i.e., containment isolation Group 1). As noted previously, the reactor vessel water level nomenclature used by BSEP Unit Nos. 1 and 2 differs from that typically used for other boiling water reactors (BWRs). The BWR industry reference of Reactor Vessel Water Level - Low, Level 1 is the same as the BSEP designation of Reactor Vessel Water Level - Low, Level 3. The BWR industry reference of Reactor Vessel Water Level - Low, Level 2 is the same for BSEP. The BWR industry reference

of Reactor Vessel Water Level - Low, Level 3 is the same as the BSEP designation of Reactor Vessel Water Level - Low, Level 1.

CP&L has previously requested and received NRC approval to actuate MSIV closure using Reactor Vessel Water Level - Low, Level 3 instead of Reactor Vessel Water Level - Low, Level 2. This change was approved as Amendment 122 to the BSEP Unit No. 1 Facility Operating License. This change was also approved as Amendment No. 146 to the BSEP Unit No. 2 Facility Operating License. Because the same instrument transmitters are used for both Reactor Vessel Water Level - Low, Level 2 and Reactor Vessel Water level - Low, Level 3, the conclusions of the evaluation of delay in trip functions documented in Appendix J of NEDO-32291-A remain applicable.

Thus, the Reactor Vessel Water Level - Low, level 1 reference provided in the notation above for Technical Specification 4.3.2.3 is equivalent to Reactor Vessel Water Level - Low, Level 3 used in Table 2 of NEDO-32291-A.

Technical Specification 3/4.3.3 (Emergency Core Cooling System Actuation Instrumentation)

Technical Specification 4.3.3.3 states the following:

The ECCS RESPONSE TIME of each ECCS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months, where N is the total number of redundant channels in a specific ECCS function.

Technical Specification 4.3.3.3 is being deleted. Instead, requirements for system response time testing of those emergency core cooling systems which need such testing (e.g., High Pressure Coolant Injection System, Core Spray System, and the Low Pressure Coolant Injection System) will now be contained in the system-specific Technical Specifications (e.g., Technical Specification 3/4.5.1 for the High Pressure Coolant Injection System, Technical Specification 3/4.5.3.1 for the Core Spray System, and Technical Specification 3/4.5.3.2 for the Low Pressure Coolant Injection System).

Technical Specification 3/4.5.1 (High Pressure Coolant Injection System)

Technical Specification 4.5.1 states the following:

4.5.1 The HPCI shall be demonstrated OPERABLE:

- c. At least once per 18 months by:
 - 1. Performing a system function test which includes simulated automatic actuation of the system throughout its emergency operating sequence and verifying that each automatic valve in the flow path actuates to its correct position. Actual injection of coolant into the reactor vessel is excluded from this test.
 - 2. Verifying that the system develops a flow of at least 4250 gpm for a system head corresponding to a reactor pressure ≥ 165 psig when steam is being supplied to the turbine at $165, \pm 15$, psig.

3. Verifying that the suction for the HPCI system is automatically transferred from the condensate storage tank to the suppression pool on a condensate storage tank low water level signal or suppression pool high water level signal.

Technical Specification 4.5.1.c.4 is being added and will require the following:

4. Verifying that the ECCS RESPONSE TIME for the HPCI system is within its limit. #

Instrumentation response time may be assumed to be the design instrumentation response time.

Technical Specification 3/4.5.3 (Low Pressure Cooling Systems)

Core Spray System

Technical Specifications 3.5.3.1 and 4.5.3.1 provide Limiting Conditions for Operation and Surveillance Requirements for the Core Spray System. Technical Specification 4.5.3.1 states the following:

4.5.3.1 Each CSS subsystem shall be demonstrated OPERABLE:

Technical Specification 4.5.3.1.e is being added and will require the following:

- e. At least once per 18 months by verifying the ECCS RESPONSE TIME for each CSS subsystem is within its limit. #

Instrumentation response time may be assumed to be the design instrumentation response time.

Low Pressure Coolant Injection System

Technical Specifications 3.5.3.2 and 4.5.3.2 provide Limiting Conditions for Operation and Surveillance Requirements for the Low Pressure Coolant Injection System. Technical Specification 4.5.3.2 states the following:

4.5.3.2 Each LPCI subsystem shall be demonstrated OPERABLE:

Technical Specification 4.5.3.2.d is being added and will require the following:

- d. At least once per 18 months by verifying the ECCS RESPONSE TIME for each LPCI subsystem is within its limit. #

Instrumentation response time may be assumed to be the design instrumentation response time.

Bases 3/4.3.1 (Reactor Protection System Instrumentation)

The following addition is being made to the paragraph which discusses response time testing in Bases Section 3/4.3.1:

As noted (Note #), neutron detectors are excluded from REACTOR PROTECTION SYSTEM RESPONSE TIME testing because the principles of detector operation virtually ensure an instantaneous response time. In addition, this note states that the response time of the sensors for Item 3, "Reactor Vessel Steam Dome Pressure - High" and Item 4, "Reactor Vessel water Level - Low, Level 1" may be assumed in the REACTOR PROTECTION SYSTEM RESPONSE TIME test to be the design sensor response time. This is allowed since other surveillance testing (e.g., channel calibration) and other techniques ensure detection of response time degradation before performance is significantly affected (Reference 1).

References:

1. NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

Bases 3/4.3.2 (Isolation Actuation Instrumentation)

The following addition is being made to the paragraph which discusses response time testing in Bases Section 3/4.3.2:

As noted (Note #), neutron detectors are excluded from ISOLATION SYSTEM RESPONSE TIME testing because the principles of detector operation virtually ensure an instantaneous response time. In addition, this note states that the response time of the sensors for Item 1.a.1, "Reactor Vessel Water Level - Low, Level 1"; Item 1.a.2, "Reactor Vessel Water Level - Low, Level 3"; Item 1.c, "Main Steam Line Flow - High"; Item 2.c, "Reactor Vessel Water level - Low, Level 2"; and Item 3.e, "Reactor Vessel Water level - Low, Level 2" may be assumed in the ISOLATION SYSTEM RESPONSE TIME test to be the design sensor response time. This is allowed since other surveillance testing (e.g., channel calibration) and other techniques ensure detection of response time degradation before performance is significantly affected (Reference 1).

References:

1. NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

Bases 3/4.5.1 (High Pressure Coolant Injection System)

The following paragraph is being added to Bases Section 3/4.5.1:

Surveillance Requirement 4.5.1.c.4 ensures that the ECCS RESPONSE TIME for the HPCI system is less than or equal to the maximum value assumed in the accident analysis. Response time testing acceptance criteria are included in Reference 6. This surveillance requirement is modified by a note that allows the instrumentation portion of the response time to be assumed to be the design instrumentation response time.

Therefore, the instrumentation response time is excluded from the ECCS RESPONSE TIME testing. This exception is allowed since other surveillance testing (e.g., channel calibration) and other techniques ensure detection of response time degradation before performance is significantly affected (Reference 7).

References:

6. Updated Final Safety Analysis Report, Section 6.3.3.7.
7. NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

Bases 3/4.5.3.1 (Core Spray System)

The following paragraph is being added to Bases Section 3/4.5.3.1:

Surveillance Requirement 4.5.3.1.e ensures that the ECCS RESPONSE TIME for each core spray system subsystem is less than or equal to the maximum value assumed in the accident analysis. Response time testing acceptance criteria are included in Reference 1. This surveillance requirement is modified by a note that allows the instrumentation portion of the response time to be assumed to be the design instrumentation response time. Therefore, the instrumentation response time is excluded from the ECCS RESPONSE TIME testing. This exception is allowed since the ECCS instrumentation response time is a small part of the ECCS RESPONSE TIME (e.g., sufficient margin exists in the emergency diesel generator start time when compared to the instrumentation response time) (Reference 2).

References:

1. Updated Final Safety Analysis Report, Section 6.3.3.7.
2. NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

Bases 3/4.5.3.2 (Low Pressure Coolant Injection System)

The following paragraph is being added to Bases Section 3/4.5.3.2:

Surveillance Requirement 4.5.3.2.d ensures that the ECCS RESPONSE TIME for each low pressure coolant injection system subsystem is less than or equal to the maximum value assumed in the accident analysis. Response time testing acceptance criteria are included in Reference 1. This surveillance requirement is modified by a note that allows the instrumentation portion of the response time to be assumed to be the design instrumentation response time. Therefore, the instrumentation response time is excluded from the ECCS RESPONSE TIME testing. This exception is allowed since other surveillance testing (e.g., channel calibration) and other techniques ensure detection of response time degradation before performance is significantly affected (Reference 2).

References:

1. Updated Final Safety Analysis Report, Section 6.3.3.7.
2. NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

BASES FOR PROPOSED CHANGE

In a letter dated April 14, 1994 (Serial: BSEP 94-0139), as supplemented by letter dated May 16, 1994 (Serial: BSEP 94-0181), CP&L submitted a license amendment request to the BSEP Technical Specifications to relocate the Technical Specification instrument response tables to the Updated Final Safety Analysis Report (UFSAR) in accordance with NRC Generic Letter 93-08. The license amendment request was approved on May 31, 1994 as Amendment Nos. 171 and 202 to Facility Operating Licenses DPR-71 and DPR-62, respectively.

In a letter dated December 28, 1994, the NRC documented its review and acceptance of the BWR Owners' Group Licensing Topical Report NEDO-32291-A, "System Analyses For The Elimination of Selected Response Time Testing Requirements." This report justifies the elimination of selected response time testing requirements. The report identifies the specific response time testing requirements that were approved for elimination. Subsequent to relocation of the affected instrument response time tables to the UFSAR, CP&L implemented the NEDO-32291-A testing methodology via the 10 CFR 50.59 review process.

On March 21, 1997, the NRC notified CP&L of an issue documented in a letter sent to Washington Nuclear Power Unit 2 (WNP-2) on March 20, 1997, regarding compliance with the Technical Specification definition for instrumentation response time testing. The Technical Specifications define response time as the time interval from when the monitored parameter exceeds its isolation actuation setpoint at the channel sensor until the required safety function has occurred. As such, verbatim compliance with the Technical Specification definition of response time for the affected instrumentation includes the sensor. However, response time testing of some sensors, components, and systems was eliminated through implementation of the NEDO-32291-A report. CP&L reviewed this issue and determined that it is applicable to BSEP Unit Nos. 1 and 2. The equipment in question are sensors associated with the RPS, Isolation System, and ECCS actuation instrumentation.

This situation does not present a safety concern because qualitative response time testing of the RPS, Isolation System, and ECCS actuation instrumentation has been completed in accordance with NEDO-32291-A, approved by the NRC in a letter dated December 28, 1994. This provides assurance of equipment operability. CP&L has not applied the response time testing methodology of NEDO-32291-A to any equipment or systems beyond that which were identified in Tables 1 and 2 of NEDO-32291-A. These components are also subject to periodic functional testing by channel functional testing and logic system functional testing. No failure mechanism has been identified that results in response time degradation for these components that can be detected by response time testing that cannot also be detected by the other Technical Specification required testing. Determination of response times in accordance with NEDO-32291-A ensures that the RPS, Isolation System, and ECCS actuation instrumentation are capable of performing their intended functions within designed response times. In the December 28, 1994 acceptance of NEDO-32291, the NRC specified that licensees must follow the recommendations from EPRI NP-7243, "Investigation of Response Time Testing Requirements." CP&L has implemented these recommendations as described below:

1. Prior to installation of a new transmitter/switch or following refurbishment of a transmitter/switch (e.g., sensor cell or variable damping components), a hydraulic response time test (RTT) shall be performed to determine an initial sensor-specific response time value.

This recommendation is achieved by providing a step function or fast ramp in the process variable during calibration of a new transmitter/switch or following refurbishment of a transmitter/switch, and as part of each subsequent refueling surveillance. Applicable test procedures at BSEP were revised to provide a fast ramp change of transmitter input while monitoring the transmitter output. This test includes injecting a simulated hydraulic signal at the input of the transmitter and noting that an instantaneous output change is received.

2. For transmitters and switches that use capillary tubes, capillary tube testing shall be performed after initial installation and after any maintenance or modification activity that could damage the lines.

BSEP does not have an application of sensors which use capillary tubes where response time testing was eliminated.

3. Calibration is being done with equipment designed to provide a step function or fast ramp in the process variable.

Calibration at BSEP is performed with equipment designed to provide a step function or fast ramp in the process variable. Applicable test procedures were revised to provide a fast ramp change of transmitter input while monitoring the transmitter output.

4. Provisions have been made to ensure that operators and technicians are aware of the consequences of instrument response time degradation, and that applicable procedures have been reviewed and revised as necessary to assure that technicians monitor for response time degradation during the performance of calibrations and functional tests.

Training has been provided to Operations and Maintenance personnel regarding instrument response time degradation.

5. Surveillance testing procedures have been reviewed and revised if necessary to ensure calibrations and functional test are being performed in a manner that allows simultaneous monitoring of both the input and output of units under test.

Applicable instrument calibration and surveillance procedures ensure calibrations and functional test are performed in a manner that allows simultaneous monitoring of both the input and output of units under test.

6. For any request involving the elimination of RTT for Rosemount pressure transmitters, the licensee is in full compliance with the guidelines of Supplement 1 to Bulletin 90-01, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount."

BSEP is in full compliance with Supplement 1 to NRC Bulletin 90-01.

7. For those instruments where the manufacturer recommends periodic RTT as well as calibration to ensure correct function, the licensee has ensured that elimination of RTT is nevertheless acceptable for the particular application involved.

CP&L has reviewed vendor documentation for the affected transmitters and has determined that there are no specific recommendations to perform periodic response time testing.

Additionally, CP&L has not applied the response time testing methodology of NEDO-32291-A to any equipment or systems beyond that which were identified in Tables 1 and 2 of NEDO-32291-A.

BASES FOR EMERGENCY/EXIGENCY

CP&L could not reasonably have taken action to avoid this situation. On March 21, 1997, the NRC formally notified CP&L of the potential for a Technical Specification compliance issue as documented in a letter sent to Washington Nuclear Power Unit 2 (WNP-2) on March 20, 1997. CP&L reviewed this issue and determined that it was also applicable to response time testing of ECCS, RPS, and Isolation System instrumentation for BSEP Unit Nos. 1 and 2. Failure to satisfy the response time testing specified in Technical Specifications 4.3.1.3, 4.3.2.3, and 4.3.3.3 requires that the applicable systems be declared inoperable. On March 21, 1997, CP&L submitted a request for enforcement discretion (BSEP 97-0117) in anticipation that regulatory relief would be required for response time testing of ECCS, RPS, and Isolation System instrumentation. Subsequently, CP&L verbally requested enforcement discretion and on March 21, 1997, at 2136 EST, the NRC staff verbally granted the request. A revised request for enforcement discretion was submitted on March 22, 1997 (BSEP 97-0119).

This license amendment request meets the requirements of 10 CFR 50.91 for both emergency and exigent processing because failure to act before the discretionary enforcement expires would result in an unnecessary shutdown of BSEP Unit Nos. 1 and 2. Additionally, the proposed amendments do not involve a significant hazards consideration. Therefore, CP&L requests emergency or exigent processing of this license amendment request.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
NRC DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR EMERGENCY/EXIGENT LICENSE AMENDMENTS
INSTRUMENTATION RESPONSE TIME TESTING

10 CFR 50.92 EVALUATION

The NRC has provided standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists. 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. CP&L has reviewed these proposed license amendment requests and concluded that their adoption does not involve a significant hazards consideration. The bases for this determination follows.

1. The proposed license amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated. BWR Owners' Group Licensing Topical Report NEDO-32291-A demonstrates that quantitative response time testing is redundant to other Technical Specification requirements. Qualitative tests are sufficient to identify failure modes or degradation in instrument response time and ensure operation of the associated systems within acceptance limits. There are no known failure modes that can be detected by response time testing that cannot also be detected by other Technical Specification required tests. ECCS, RPS, and Isolation System response times will continue to be determined using a methodology that has been reviewed and approved by the NRC. Therefore, the proposed license amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. The proposed license amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed license amendments do not affect the capability of the associated systems to perform their intended function within the acceptance limits assumed in the plant safety analyses and required for successful mitigation of an initiating event. The proposed amendments do not change the way in which any plant systems are operated. ECCS, RPS, and Isolation System response times will continue to be determined using a methodology that has been reviewed and approved by the NRC. Therefore, the proposed amendments do not create the possibility of a new or different kind of accident.
3. The proposed license amendments do not involve a significant reduction in a margin of safety. The current Technical Specification response times are based on the maximum allowable values assumed in the plant safety analyses. These analyses conservatively establish the margin of safety. As described above, determination of response times based on an alternate NRC approved methodology (i.e., provided in the NEDO-32291-A report) will not affect the capability of the associated systems to perform their intended function within the allowed response time used as the bases for the plant safety analyses.

Plant and system response to an initiating event will remain in compliance with the assumptions of the safety analyses; therefore, the margin of safety is not affected.

Based on the above, CP&L concludes that the proposed license amendments do not involve a significant hazards consideration. CP&L has also concluded that the proposed amendments do not involve an unreviewed safety question based on the 10 CFR 50.59 evaluation that was prepared for the implementation of NEDO-32291-A.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
NRC DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR EMERGENCY/EXIGENT LICENSE AMENDMENTS
INSTRUMENTATION RESPONSE TIME TESTING

ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) result in an increase in individual or cumulative occupational radiation exposure. CP&L has reviewed this request and concluded that the proposed amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement of environmental assessment needs to be prepared in connection with the issuance of these amendments. The bases for this determination follows.

1. The proposed license amendments do not involve a significant hazards consideration, as shown in Enclosure 2.
2. The proposed license amendments do not result in a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite. The proposed license amendments do not introduce any new equipment nor does it require any existing equipment or systems to perform a different type of function than they are presently designed to perform. The proposed license amendments do not alter the function of existing equipment and will ensure that the consequences of any previously evaluated accident do not increase. Therefore, CP&L has concluded that there will not be a significant increase in the types or amounts of any effluent that may be released offsite and, as such, does not involve irreversible environmental consequences beyond those already associated with normal operation.
3. The proposed license amendments do not result in an increase in individual or cumulative occupational radiation exposure.

Based on the above, CP&L concludes that the proposed amendments do not require an environmental assessment.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
NRC DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR EMERGENCY/EXIGENT LICENSE AMENDMENTS
INSTRUMENTATION RESPONSE TIME TESTING

<u>PAGE CHANGE INSTRUCTIONS</u>	
<u>UNIT 1</u>	
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3/4 3-33	3/4 3-33
3/4 5-2	3/4 5-2
3/4 5-6	3/4 5-6
3/4 5-8	3/4 5-8
B 3/4 3-1	B 3/4 3-1
---	B 3/4 3-1a
B 3/4 3-2	B 3/4 3-2
B 3/4 3-2a	B 3/4 3-2a
B 3/4 5-1a	B 3/4 5-1a
---	B 3/4 5-1b
B 3/4 5-3	B 3/4 5-3
---	B 3/4 5-3a

PAGE CHANGE INSTRUCTIONS

UNIT 2

Removed page	Inserted page
3/4 3-1a	3/4 3-1a
3/4 3-11	3/4 3-11
3/4 3-33	3/4 3-33
3/4 5-2	3/4 5-2
3/4 5-6	3/4 5-6
3/4 5-8	3/4 5-8
B 3/4 3-1	B 3/4 3-1
---	B 3/4 3-1a
B 3/4 3-2	B 3/4 3-2
B 3/4 3-2a	B 3/4 3-2a
B 3/4 5-1a	B 3/4 5-1a
---	B 3/4 5-1b
B 3/4 5-3	B 3/4 5-3
---	B 3/4 5-3a