



Carolina Power & Light Company
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William R. Campbell
Vice President
Brunswick Nuclear Plant

MAR 31 1997

SERIAL: BSEP 97-0100
10 CFR 50.90
TSC 87TSB16

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
SUPPLEMENT TO REQUEST FOR LICENSE AMENDMENTS
APPLICABILITY AND SURVEILLANCE REQUIREMENTS

Gentlemen:

By letter dated April 4, 1996 (Serial: BSEP 96-0126), and as supplemented by letter dated January 24, 1997 (Serial: BSEP 97-0024), 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. These proposed license amendments will revise Technical Specifications 3.0 and 4.0, and respective Bases for these sections to incorporate guidance contained in Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) On The Applicability of Limiting Conditions for Operation and Surveillance Requirements," and NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 1, April 1995.

The purpose of this submittal is to revise proposed Technical Specification 4.0.1 to include a stipulation that failure to meet a Surveillance Requirement constitutes a failure to meet the Limiting Condition for Operation. This requirement is currently included in Technical Specification 4.0.3; however, this requirement was inadvertently not transferred to proposed Technical Specification 4.0.1 as part of the license amendment request. This requirement is being added to Technical Specification 4.0.1, along with associated Bases discussion. Enclosure 1 provides further discussion of this revision. Updated page change instructions are provided in Enclosure 2. Updated typed Technical Specification pages for BSEP Unit No. 1 and BSEP Unit No. 2 are provided in Enclosures 3 and 4, respectively.

CP&L is providing, in accordance with 10 CFR 50.91(b), Mr. Mel Fry of the State of North Carolina with a copy of this submittal.

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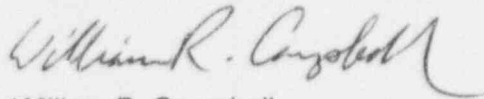
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Please refer any questions regarding this submittal to Mr. Keith R. Jury, Manager - Regulatory Affairs at (910) 457-2783.

Sincerely,



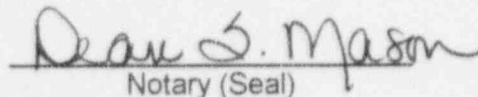
William R. Campbell

WRM/wrm

Enclosures:

1. Discussion of Revision to License Amendment Request
2. Page Change Instructions
3. Typed Technical Specification Pages - Unit 1
4. 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: August 21, 1999

pc (with enclosures):

U. S. Nuclear Regulatory Commission
ATTN.: Mr. Luis A. Reyes, Regional Administrator
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U. S. Nuclear Regulatory Commission
ATTN.: Mr. C. A. Patterson, NRC Senior Resident Inspector
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Southport, NC 28461

U. S. Nuclear Regulatory Commission
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The Honorable J. A. Sanford
Chairman - North Carolina Utilities Commission
P.O. Box 29510
Raleigh, NC 27626-0510

Mr. Mel Fry
Acting Director - Division of Radiation Protection
North Carolina Department of Environment, Health, and Natural Resources
3825 Barrett Drive
Raleigh, NC 27609-7221

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
SUPPLEMENT TO REQUEST FOR LICENSE AMENDMENTS
APPLICABILITY AND SURVEILLANCE REQUIREMENTS

DISCUSSION

By letter dated April 4, 1996 (Serial: BSEP 96-0126), and as supplemented by letter dated January 24, 1997 (Serial: BSEP 97-0024), 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. These proposed license amendments would revise Technical Specifications 3.0 and 4.0, and respective Bases for these sections, to incorporate guidance contained in Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) On The Applicability of Limiting Conditions for Operation and Surveillance Requirements," and NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 1, April 1995.

Generic Letter 87-09 provides increased flexibility with regard to Technical Specification 3.0.4 by removing unnecessary restrictions on operational mode changes in those cases where conformance with an Action requirement already provides an acceptable level of safety for continued operation in any mode for an unlimited period of time. In addition, Generic Letter 87-09 includes a change to Technical Specification 4.0.3 to eliminate unnecessary plant shutdowns caused by this specification when surveillance intervals are inadvertently exceeded.

The purpose of this submittal is to revise proposed Technical Specification 4.0.1 to include a stipulation that failure to meet a Surveillance Requirement constitutes a failure to meet the Limiting Condition for Operation. This requirement is currently included in Technical Specification 4.0.3. In the April 4, 1996, license amendment request, this requirement was inadvertently omitted instead of being relocated to the proposed Technical Specification 4.0.1. Therefore, the stipulation that failure to meet a Surveillance Requirement constitutes a failure to meet the Limiting Condition for Operation is now being relocated and included as part of Technical Specification 4.0.1. Thus, proposed Technical Specification 4.0.1 will read as follows:

Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation unless otherwise stated in the Surveillance Requirement. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the Limiting Condition for Operation except as provided in Surveillance Requirement 3.0.3.

This approach is consistent with NUREG-1433, which also includes this stipulation as part of Surveillance Requirement 4.0.1. Changes to the Bases associated with relocation of this stipulation from Specification 4.0.3 to Specification 4.0.1 are also enclosed.

This revision provided herein to Technical Specification 4.0.1 restores a requirement that was inadvertently omitted during preparation and submittal of the April 6, 1996, license amendment request. As such, these revisions are considered administrative changes which have no impact

on the bases or conclusions of the significant hazards evaluation included in our April 4, 1996, submittal. Therefore, CP&L has determined that the conclusions of the significant hazards evaluation published in the Federal Register on July 17, 1996 (61 FR 37297), remains valid.

Through telephone conversations with the NRC Project Manager, CP&L has requested that the portion of this submittal which eliminates the Technical Specification 4.0.3 requirement (i.e., shut down the unit when a surveillance interval has been inadvertently exceeded), be issued through a separate license amendment for each unit. CP&L has suggested that the remainder of the proposed license amendment (i.e., the portion that allows operational mode changes in those cases where conformance with an Action requirement permits continued operation in any mode for an unlimited period of time) be separately issued when NRC review of that portion of the amendment request can be completed. Therefore, based on this approach, CP&L is enclosing updated typed Technical Specification pages for BSEP Unit No. 1 and BSEP Unit No. 2 which address only the changes to Technical Specification 4.0.3 and its associated Bases regarding an inadvertently missed surveillance. These typed pages do not include the revisions associated with the Technical Specification 3.0.4 changes. The page update instructions provided in Enclosure 2 have been revised to reflect issuance of only the Technical Specification 4.0.3 requirement.

Typed Technical Specification pages for the portion of the license amendment request relating to the Technical Specification 3.0.4 changes will be provided in under separate cover in the near future.

REFERENCES

1. NRC Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) On The Applicability of Limiting Conditions for Operation and Surveillance Requirements," dated June 4, 1987.
2. CP&L letter from William Levis to the NRC Document Control Desk, "Request for License Amendments - Applicability and Surveillance Requirements," dated April 4, 1996 (Serial Number BSEP 96-0126).
3. CP&L letter from John S. Keenan to the NRC Document Control Desk, "Response to Request for Additional Information, Request for License Amendments, Applicability and Surveillance Requirements," dated January 24, 1997 (Serial Number BSEP 97-0024).

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
 SUPPLEMENT TO REQUEST FOR LICENSE AMENDMENTS
 APPLICABILITY AND SURVEILLANCE REQUIREMENTS

<u>PAGE CHANGE INSTRUCTIONS</u>	
<u>UNIT 1</u>	
Removed page	Inserted page
3/4 0-2	3/4 0-2
B 3/4 0-2	B 3/4 0-2
B 3/4 0-3	B 3/4 0-3
---	B 3/4 0-4

<u>PAGE CHANGE INSTRUCTIONS</u>	
<u>UNIT 2</u>	
Removed page	Inserted page
3/4 0-2	3/4 0-2
B 3/4 0-2	B 3/4 0-2
B 3/4 0-3	B 3/4 0-3
---	B 3/4 0-4