

November 22, 1985

Docket Nos. 50-325/324

LICENSEE: Carolina Power & Light Company (CP&L)

FACILITY: Brunswick Steam Electric Plant, Units 1 and 2

SUBJECT: SUMMARY OF MEETING HELD ON NOVEMBER 8, 1985 TO DISCUSS  
THE CP&L RESPONSE TO GENERIC LETTER (GL) 84-09

#### Background

The rule on hydrogen recombiner capability was issued on December 2, 1981. On May 8, 1984, the staff completed an evaluation of the BWR Mark I Owners Group report and issued Generic Letter 84-09. This letter provided criteria by which licensees could determine whether the hydrogen recombiner capability was required. On June 8, 1984, CP&L responded by stating that the Brunswick facilities meet Criteria 1 and 3 and, with modifications, would also meet Criterion 2. On January 15, 1985, the staff requested additional information. On March 1, 1985, CP&L responded. On March 26, 1985, the staff reiterated the request based on a conflicting interpretation of Criterion 2. CP&L responded on April 26, 1985, requesting a meeting to clarify and resolve the issue. A May 29, 1985 meeting was held for that purpose. Based on the May 29, 1985 meeting, CP&L responded to the staff's March 26, 1985 Request for Additional Information by letter dated July 15, 1985. However, the staff could not understand the details of the Brunswick instrument air and inerting systems well enough to determine whether they meet Criterion 2 of GL 84-09. The staff position expressed by Criterion 2 is that there should be no source of oxygen inside containment during operation including the air in the instrument air systems. CP&L proposed a nitrogen switchover system that isolated the instrument air and replaced air with nitrogen at the time of a loss-of-coolant accident (LOCA). The difficulty was in determining whether this nitrogen switchover system in conjunction with other features of the Brunswick systems, is an acceptable alternative to Criterion 2. This current meeting was held to discuss the details of the nitrogen switchover system proposed by CP&L for the Brunswick facilities. Attendees are listed in Enclosure 1.

#### Summary

The Brunswick air and nitrogen systems as well as the related Technical Specifications and procedures were thoroughly described by CP&L and discussed. The system piping is designed to Seismic Class 1 requirements. The procedures are designed to keep the oxygen concentration below 4%, and have succeeded in doing so for about the past 2 years. In practice, the oxygen concentration is normally kept below 1%. When the gradual drift gets this value to 3.2%-3.5%, (an alarm is set for 3.7%) action is taken to reduce this value to less than 1% (about a 2-hour process).

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Based on the presentation and discussion, the staff could not conclude that Criterion 2 of Generic Letter 84-09 was met, i.e., that acceptable compensatory measures were taken. CP&L will evaluate the possibility of the use of an oxygen gradient control and automatic isolation of the instrument air system as possible compensatory measures. The staff will consider the new details available regarding the Brunswick system. A conference call will be held in about 1 week after which a staff position will be issued.

Original signed by/

Marshall Grotenhuis, Project Manager  
Operating Reactors Branch #2  
Division of Licensing


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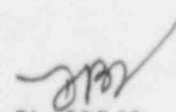
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ON THE CP&L RESPONSE TO GENERIC LETTER 84-09

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