



Carolina Power & Light Company

JUL 01 1985

SERIAL: NLS-85-479

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  
ROD SEQUENCE CONTROL SYSTEM

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 changes to TS Sections 3.1.4.2 and 4.1.4.2 allow for bypassing a maximum of three inoperable control rods in any Rod Sequence Control System (RSCS) group. The change also expands the surveillance requirements for RSCS operability.

#### DISCUSSION

The requested TS change adds Action Statement c. to TS Section 3.1.4.2. This Action Statement allows bypassing of inoperable control rods in the RSCS. Before an inoperable control rod is bypassed, two conditions must be met which ensure safe operation of the plant: 1) the position and bypassing of the rod must be verified by a second licensed operator or other technically qualified member of the unit technical staff; and 2) there may not be more than three inoperable control rods in any RSCS group. This change is consistent with guidance provided in the GE/BWR-4 Standard Technical Specifications (STS).

Changes have also been proposed for TS Section 4.1.4.2. This section has been reformatted and Surveillance Requirements b. and c. have been added, making it more closely conform to the GE/BWR-4 STS. Surveillance Requirement b tests the one notch inhibit on control rod movement when the group notch mode is initiated. Surveillance Requirement c. requires performance of a comparator check of the group notch circuits. These surveillance requirements will help ensure complete RSCS function reliability.

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*Approval w/ check \$150.00  
#539726*

## 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, or create the possibility of a new accident because there are no physical alterations of the plant configuration or changes to setpoints and only minor changes to operating parameters.

The proposed TS conforms with the guidance provided in the GE/BWR-4 STS. Safe operation of the plant when bypassing inoperable control rods is assured by meeting the stipulated conditions. Surveillance requirements are also expanded to increase RSCS function reliability; therefore, there will be no significant reduction in the margin of safety.

Based on the above reasoning, CP&L has determined that operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequence of an accident previously evaluated; (2) create a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As such, this request involves no significant hazards consideration.

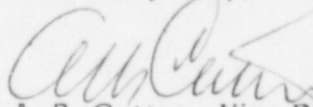
## ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 and Brunswick-2 TS pages are provided in Enclosures 1 and 2.

Carolina Power & Light Company has evaluated this requested in accordance with the provisions of 10CFR170.12 and has determined that a license amendment application fee is required. A check for \$150 is enclosed in payment of this fee.

Please refer any questions concerning this submittal to Mr. Sherwood R. Zimmerman at (919) 836-6242.

Yours very truly,

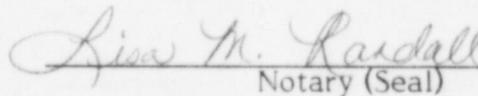
  
A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

ABC/MAT/ccc (859MAT)  
Enclosure

cc: Mr. W. H. Ruland (NRC-BNP)  
Dr. J. Nelson Grace (NRC-R11)  
Mr. M. Grotenhuis (NRC)  
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)

