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Posted Bases change to DPR-62

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Docket Nos. 50-325/324

MAR 18 1986

Mr. E. E. Utley
Senior Executive Vice President
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OPA

Dear Mr. Utley:

SUBJECT: CHANGE TO BASES OF BRUNSWICK TECHNICAL SPECIFICATION 3/4.7.6, "SEALED SOURCE CONTAMINATION"

Re: Brunswick Steam Electric Plant, Units 1 and 2

By letter dated August 28, 1985, the Carolina Power & Light Company (CP&L) submitted proposed changes to the Bases to the Technical Specifications appended to Facility Operating License No. PDR-71 and DPR-62 for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2. The proposed changes would modify the Bases for Technical Specification Section 3/4.7.6 related to testing for contamination of sealed sources containing radioactive material. The proposed change would clarify the Bases to indicate that it is not necessary to test sealed sources that are continuously enclosed within a shielded mechanism.

We have reviewed your request and agree that sources enclosed in a sealed mechanism need not be tested for contamination. Past experience at operating nuclear power plants demonstrates that leak testing of such sources is not required to ensure that the allowable personnel doses of 10 CFR Part 20 are not exceeded. In fact, the process of testing these sources may actually increase personnel exposures through damage to the source. We therefore find your requested change acceptable.

Because the proposed change is to the Bases and not to the Technical Specifications, an amendment is not required and is not being issued. We have, however, revised page B3/4 7-4 for Brunswick Unit 1 and page B3/4 7-4 for Unit 2. A copy of these revised pages is enclosed.

Sincerely,

Original signed by
Daniel R. Muller

Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

Enclosure:
As stated

cc w/enclosure:
See next page

DBL:PD#2	DBL:PD#2	DBL:PD#2
SNorris:rs	ESylvester	DMuller
3/14/86	3/17/86	3/18/86

Mr. E. E. Utley
Carolina Power & Light Company

Brunswick Steam Electric Plant
Units 1 and 2

cc:
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SNUBBERS (Continued)

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

3/4.7.6 SEALED SOURCE CONTAMINATION

The limitation on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from by-product, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism, i.e., sealed sources with radiation monitoring or boron measuring devices, are considered to be stored and need not be tested unless they are removed from the shielding mechanism.

3/4.7.7 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO_2, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

In the event the fire suppression water system become inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for a 24-hour report to the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

SNUBBERS (Continued)

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