

March 21, 1989

DISTRIBUTION
Docket File
NRC PDR
EReeves
PAnderson
ETourigny
OGC

MEMORANDUM FOR: Sholly Coordinator
FROM: E. G. Tourigny, Senior Project Manager
Project Directorate II-1
Division of Reactor Projects I/II

SUBJECT: REQUEST FOR PUBLICATION IN BI-WEEKLY FR NOTICE - NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES AND PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION AND OPPORTUNITY FOR A HEARING (TAC NO. 72061 AND 72062)

Carolina Power & Light Company, et al., Docket Nos. 50-325 and 50-324,

Brunswick Steam Electric Plant, Units 1 and 2, Brunswick County, North Carolina

Date of application for amendments: February 1, 1989

Description of amendment request: The amendments would delete references to instrument tag numbers from the technical specifications and provide other editorial and administrative revisions. Carolina Power & Light Company (CP&L) the licensee for the Brunswick Steam Electric Plant, Units 1 and 2, (BSEP) divided the changes into seventeen change categories. For ease in noticing, the staff grouped these into five broad categories.

Category 1 changes would delete instrument tag numbers throughout the technical specifications, delete the words "Instrument Number" from column headings, replace instrument tag numbers with the words "Transmitter," "Trip Logic," "N017 Instrument Loop," or "Remaining Instruments Logic; delete Footnote (a) from Table 3.3.5.3-1; delete footnote (b) from table 3.3.6.1-1; and combine footnote ## and ### into footnote (c) on page 3/4 3-26.

8903270155 890321
PDR ADOCK 05000324
PDC

~~DFP~~
change, per 4/3 telcon
w/DCD

Category 2 changes would replace existing numerical and symbolic footnote notations with alphabetical notations; replace the word "Condition" with the phrase "Operational Condition," or "Action" with "Actions," or "Table Notations" with "Notes," or "Action Statements" with "Actions"; change the item notation in Table 3.3.7-1 from alphabetical to numerical, and add the title "Actions" to the top of action table associated with Table 3.3.7-1.

Category 3 changes would delete footnotes no longer necessary. Specifically, footnotes would be deleted from technical specifications dealing with a one time hydrogen injection test authorized in Amendment 131 (Unit 2 only). Footnote ** would be deleted from surveillance requirement 4.1.3.5.b, (Unit 1 only) and footnote * would be deleted from surveillance requirement 4.5.3.1.c (both units).

Category 4 changes would manipulate footnotes and tables (ie. turn the tables, add appropriate headings, double-space, put parentheses around the footnotes notations, and rearrange the footnotes into alphabetical order).

Category 5 changes would repaginate existing pages to accommodate deletion of information discussed above and eliminate the current "a" pages.

Basis for proposed no significant hazard consideration determination: The Commission has provided standards for determining whether a no significant hazard consideration exists as stated in 10 CFR 50.92(c). A proposed amendment to an operating license 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; or (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. The Carolina Power & Light Company (CP&L) has reviewed the proposed changes to the technical specifications and has determined that the requested amendment does not involve a significant hazards consideration.

The licensee has provided the following no significant hazards consideration rationale for the Category 1 changes.

Delete Instrument Tag Numbers:

1. The proposed change does not involve a change in the design, operation or testing of any plant system. It deletes information not required to be included in the Technical Specifications, thereby potentially reducing both NRC and CP&L administrative effort involved in keeping the Technical Specifications updated. No new equipment will be installed, nor will any new or different operational modes be created. The instrument tag numbers will be addressed in plant procedures and updated therein, as necessary. The tag number lists will be adequately controlled through 10CFR50.59. Therefore, this change has no effect on the probability of an accident, nor does it impact the consequences of any accident previously evaluated.
2. The proposed change deletes information not required to be addressed in the Technical Specifications. It does not reflect a change to the design, operation or testing of plant equipment; it only administratively deletes the instrument tag numbers from the Technical Specifications. The instrument tag numbers will be maintained and updated in the plant procedures. Therefore, no new or different accident possibilities are created.
3. The proposed change has no effect on the design or operation of any plant system. It only deletes references to instrument tag numbers for the Technical Specifications. The instrument tag numbers are not required to be incorporated in the Technical Specifications, and it takes a great deal of effort for both the NRC and CP&L to keep the information updated. The instrument tag numbers will be handled and

updated via plant procedures, thereby potentially eliminating the need for several Technical Specification amendment requests per year. Therefore, since the information will continue to be maintained, only in a different form, there is no impact on the margin of safety of the plant.

Delete the words "Instrument Number" from column headings:

1. The proposed change does not directly affect any equipment or instrumentation. It only deletes the words "Instrument Number" from the column headings of the tables currently listing instruments and their associated instrument tag numbers. The instrument tag numbers are being deleted, as described in Proposed Change Number 3. Therefore, the column headings no longer need to reference the instrument numbers. Thus, the proposed change does not change the probability of any accident previously evaluated.
2. The proposed change is administrative in nature. It deletes column headings that are no longer necessary because the referenced information is being deleted as described in Proposed Change No. 3. No equipment or instrumentation is being changed or affected. Therefore, no new or different accident possibilities are created.
3. The proposed change does not affect any instrumentation or equipment. It is administrative in nature since it is being made only to provide consistency with the information provided in the associated columns. Therefore, there is no decrease in the margin of safety.

Replace instrument tag numbers with "Transmitters," "Trip Logic," "NO17 Instrument Loop," and "Remaining Instrumentation," and combine footnotes on page 3/4 3-26:

1. The proposed change does not involve a change in the design, operation or testing of any plant system. It deletes information not required to be included in the Technical Specifications, thereby potentially reducing both NRC and CP&L administrative effort involved in keeping the Technical Specifications updated. The instrument tag numbers will be addressed in plant procedures and updated therein as necessary. Therefore, this change has no effect on the probability of an accident, nor does it impact the consequences of any accident previously evaluated.
2. The proposed change deletes information not required to be addressed in the Technical Specifications. It does not reflect a change to the design, operation or testing of plant equipment; it only administratively deletes the instrument tag numbers from the Technical Specifications. The instrument tag numbers will be maintained and updated in the plant procedures. Therefore, no new or different accident possibilities are created.

3. The proposed change has no effect on the design or operation of any plant system. It only deletes references to instrument tag numbers for the Technical Specifications. The instrument tag numbers are not required to be incorporated in the Technical Specifications, and it takes a great deal of effort for both the NRC and CP&L to keep the information updated. The instrument tag numbers will be handled and updated via plant procedures, thereby potentially eliminating the need for several Technical Specification amendment requests per year. Therefore, since the information will continue to be maintained only in a different form, there is no impact on the margin of safety of the plant.

The following is a combination of two determinations (12 and 16) from the licensee.

Delete footnote (a) from Table 3.3.5.3-1 and footnote (b) from Table 3.3.6.1-1:

1. The proposed change deletes a footnote which was meant to clarify the list of tag numbers associated with Items 9 and 10 of Table 3.3.5.3-1 and Items 1 and 2 of Table 3.3.6.1-1. The tag numbers associated with these items are being deleted, as described elsewhere in this submittal. The definition of instrument functions are required to be listed in the Technical Specifications. Deletion of this footnote will not affect the operation or testing of the instrumentation; therefore, it will not change the probability of an accident, nor will it change the consequences of any accident.
2. The proposed change deletes a footnote which clarifies a list of tag numbers associated with Items 9 and 10 of Table 3.3.5.3-1 and Items 1 and 2 of Table 3.3.6.1-1. The tag numbers are being deleted from the Technical Specifications, as described elsewhere in this submittal. Deletion of this footnote will not impact the operation or testing of the instrumentation, and therefore will not create the possibility of a new or different type of accident.
3. The proposed change deletes a footnote which becomes unnecessary once the instrument tag numbers are deleted from the Technical Specifications. The tag numbers are being deleted from the Technical Specifications, as described elsewhere in this submittal. The change is administrative since the tag numbers are not required to be listed in the Technical Specifications. The footnote provides a clarification to the list of instruments associated with Items 9 and 10 of Table 3.3.5.3-1 and Items 1 and 2 of Table 3.3.6.1-1. Thus, this footnote is no longer necessary once the tag numbers are deleted. Since the change is administrative, there is no impact on the margin of safety.

The licensee has provided the following no significant hazards consideration rationale for the Category 2 changes:

Replace existing numerical and symbolic footnote notation with alphabetical notation:

1. The proposed change is an administrative change to the Technical Specifications to provide consistency throughout the Technical Specifications. The content of the footnotes has not changed unless specified elsewhere in this enclosure. The changes to the footnote or footnote table have been made to provide clarity and consistency to the Technical Specifications. Therefore, it does not involve a significant increase in the probability of an accident, nor does it involve a change in the consequences of an accident previously evaluated.
2. The proposed change is purely administrative. It will provide consistency with other entries provided elsewhere in the table and in the Technical Specifications. It does not represent a change in the content of the footnote. Therefore, it does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed change is an administrative change. It will provide consistency and clarity within the table and the Technical Specifications. It does not involve a change in the content of the footnotes. Therefore, there is no impact on the margin of safety.

Replace the word "condition" with the phrase "Operational Condition," or "Action" with "Actions," or "Table Notations" with "Notes" or "Action Statements" with "Actions":

1. The proposed change does not involve a change in design, operation or testing of any plant system. It is an administrative change intended to provide consistency throughout the Technical Specifications. Therefore, it has no effect on the probability of an accident, nor does it impact the consequences of any accident previously evaluated.
2. The proposed change is administrative in nature, intended only to provide consistency within the Technical Specifications. It does not change the design or operation of any plant system. Therefore, it does not create the possibility of a new or different kind of accident.
3. The proposed change does not affect system operation or design. It only provides consistency in terminology with other sections of the Technical Specifications. For this reason, it has no impact on the margin of safety of the plant.

The following is a combination of two licensee determinations (7 and 8).

Table 3.3.7-1 notation changes and add the title "Actions":

1. The proposed change is an administrative change to the Technical Specifications to provide consistency throughout the table. The content of the items has not changed unless specified elsewhere in this enclosure. It provides a missing title to the Action table associated with Table 3.3.7-1. It does not affect the design or operation of any plant system, nor does it change the content of the actions listed. Therefore, it does not involve a significant increase in the probability of an accident, nor does it involve a change in the consequences of an accident previously evaluated.
2. The proposed change is purely administrative. It will provide consistency with other entries provided elsewhere in the table and in the Technical Specifications. It does not represent a change in the content of the item. It merely adds a missing title. Therefore, it does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed change is an administrative change. It will provide consistency and clarity within the table and Technical Specifications. It does not involve a change in the content of the items. It only provides a missing title. Therefore, there is no impact on the margin or safety.

The licensee has provided the following no significant hazards consideration rationale for Category 3 changes.

Delete Footnotes for H Injection Test (Unit 2 only):

1. The proposed change deletes a footnote which no longer applies. The footnote was added to support a one-time hydrogen injection test, which was completed on January 5, 1987. No additional testing is planned. Thus, the proposed change has no effect on the probability of an accident, nor does it affect the consequences of any accidents.
2. The referenced footnote no longer applies to BSEP-2. The hydrogen injection test was successfully completed on January 5, 1987. Thus, the footnote is no longer necessary, and deletion of it will not create the possibility of a new or different type of accident.
3. Footnotes (7) and (i) were added to support a one-time hydrogen injection test, which was completed on January 5, 1987. No additional testing is planned; therefore, the footnotes no longer apply and should be deleted. This deletion has no impact on the margin of safety.

Delete Footnote ** from Surveillance Requirement 4.1.3.5.b (Unit 1 only):

1. The proposed change deletes a footnote which no longer applies. The footnote was added to allow a one-time extension in the surveillance interval for Surveillance Requirement 4.1.3.5.b. The extension expired after the Spring 1981 outage; therefore, the footnote no longer applies. Thus, the proposed change has no impact on the probability or consequences of an accident.
2. The referenced footnote no longer applies to BSEP-1. The surveillance interval extension expired after the Spring 1981 outage. Thus, this footnote is no longer necessary. Therefore, its deletion will not create the possibility of new or different type of accident.
3. Footnote ** was added to the Technical Specifications to allow a one-time extension of a surveillance interval which expired after the Spring 1981 outage. Therefore, this deletion has no impact on the margin of safety of the plant.

Delete Footnote * from Surveillance Requirement 4.5.3.1.c on Page 3/4 5-6.

1. The proposed change deletes a footnote which no longer applies. The footnote was added to allow a one-time postponement of a flow test of the core spray. The extension expired on October 30, 1985 for BSEP-1 and November 15, 1984 for BSEP-2; therefore, the footnote no longer applies. Thus, the proposed change has no impact on the probability or consequences of an accident.
2. The referenced footnote no longer applies. The flow test extension interval expired on October 30, 1985 for BSEP-1 and on November 15, 1984 for BSEP-2. Thus, this footnote is no longer necessary. Therefore, its deletion will not create the possibility of a new or different type of accident.
3. Footnote * was added to the Technical Specifications to allow a one-time extension of a flow test requirement which expired on October 30, 1985 for BSEP-1 and on November 15, 1984 for BSEP-2. Therefore, this deletion has no impact on the margin of safety of the plant.

The following Category 4 determinations were made by the licensee.

Manipulate the footnote tables (i.e., turn the tables, add appropriate headings, double-space the footnotes, put parentheses around the footnote notation, and rearrange the footnotes into alphabetical order) and turn the tables upright:

1. The proposed change is an administrative change to the Technical Specifications to provide consistency throughout the Technical Specifications. The content of the footnotes and items in the table has not changed unless specified elsewhere in this enclosure. The

changes to the footnote or footnote table have been made to provide clarity and consistency to the Technical Specifications. Therefore, it does not involve a significant increase in the probability of an accident, nor does it involve a change in the consequences of an accident previously evaluated.

2. The proposed change is purely administrative. It will provide consistency with other entries provided elsewhere in the table and in the Technical Specifications. It does not represent a change in the content of the footnote or items. Therefore, it does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed change is an administrative change. It will provide consistency and clarity within the table and the Technical Specifications. It does not involve a change in the content of the footnotes. Therefore, there is no impact on the margin of safety.

Lastly, Category 5 determinations are as follows:

Repaginate to accommodate tag number deletions:

1. The proposed change is administrative in nature. It has no impact on the design or operation of any safety system; it only repaginates the affected section of the Technical Specifications to accommodate deletions on previous pages and to eliminate "a" pages. Therefore, the proposed change does not have any affect on the probability or consequences of any accident previously evaluated.
2. The proposed change is administrative in nature. It's only purpose is to repaginate a section of the Technical Specifications where information is being deleted which is addressed by other proposed changes provided elsewhere in this submittal. Therefore, it does not create the possibility of a new or different kind of accident.
3. Repagination of this section has no bearing on the design or operation of any system. It is purely administrative. Thus, it does not impact the margin of safety of the plant.

The staff has reviewed the CP&L determinations and is in agreement with them. The instrument tag numbers will still be controlled by the licensee via a licensee controlled document subject to 10 CFR 50.59. The licensee stated that the one-time Unit 2 hydrogen injection test took place in January 1987, and the special footnotes are no longer necessary. The

one-time Unit 1 extension in the surveillance interval for surveillance requirement 4.1.3.5.b expired after the Spring 1981 outage and is no longer necessary. The footnotes associated with surveillance requirement 4.5.3.1.c, which deals with the core spray system flow test, is no longer necessary because the tests were conducted within the time periods specified. Lastly, all other changes are administrative in nature. Accordingly, the Commission proposes to determine that these changes do not involve a significant hazards consideration.

Local Public Document Room location: University of North Carolina at Wilmington, William Madison Randall Library, 601 S. College Road, Wilmington, North Carolina 28403-3297.

Attorney for licensee: R. E. Jones, General Counsel, Carolina Power & Light Company, P. O. Box 1551, Raleigh, North Carolina 27602

NRC Acting Project Director: Edward A. Reeves

E. G. Tourigny, Senior Project Manager
Project Directorate II-1
Division of Reactor Projects I/II

OFC	: LA: PD21	: DRPR: PM: PD21	: DRPR: AD: PD21	: DRPR:	:	:	:
NAME	: PAnderson	: ETourigny	: jw: EReeves	:	:	:	:
DATE	: 3/13/89	: 3/17/89	: 3/19/89	:	:	:	: