August 20, 1987

Dockets Nos. 50-325/324

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Mr. E. E. Utley
Senior Executive Vice President
Power Supply and Engineering & Construction
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

Dear Mr. Utley:

SUBJECT: ISSUANCE OF AMENDMENT NO.111 TO FACILITY OPERATING LICENSE NO. DPR-71 AND AMENDMENT NO. 138 TO FACILITY OPERATING LICENSE NO. DPR-62 - BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2, REGARDING NITROGEN BACKUP SYSTEM OPERABILITY (TAC NOS. 65004 and 65005)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 111 to Facility Operating License Nos. DPR-71 and Amendment No. 138 to Facility Operating Licnese No. DPR-62 for the Brunswick Steam Electric Plant, Units 1 and 2. The amendments consist of changes to the Technical Specifications in response to your submittal dated March 27, 1987.

The amendments change the Technical Specifications to include operability requirements for the pressurized nitrogen systems that have been installed as backups to each plant instrument air system.

The NRC staff has concluded in issuing these amendments that you have demonstrated that recombiner capability is not needed for Brunswick Units 1 and 2 in accordance with 10 CFR 50.44. Therefore, no further action is required with respect to Generic Letter 84-09.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

/S/

Ernest D. Sylvester, Project Manager
Project Directorate II-1
Division of Reactor Projects I/II

Enclosures:
1. Amendment No.111 to License No. DPR-71
2. Amendment No. 138 to License No. DPR-62
3. Safety Evaluation

cc w/enclosures:
See next page

OFFICIAL RECORD COPY

PD21:DRPR	PD21:DRPR	PD21:DRPR	PD21:DRPR
PAnderson	BMozafari	ESylvester	EAdensam
7/31/87	7/31/87	7/31/87	7/13/87

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-325

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 111
License No. DPR-71

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Carolina Power & Light Company (the licensee), dated March 27, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 2.C.(2) of Facility Operating License No. DPR-71 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 111, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Elinor G. Adensam, Director
Project Directorate II-1
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 20, 1987

LA:PD21:DRPR	PM:PD21:DPRP	D:PD21:DRPR	OGC-B
PAnderson	ESylvester	EAdensam	
7/31/87	7/24/87	7/31/87	8/12/87

ATTACHMENT TO LICENSE AMENDMENT NO. 111

FACILITY OPERATING LICENSE NO. DPR-71

DOCKET NO. 50-325

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove Pages	Insert Pages
3/4 6-20	3/4 6-20
-- --	3/4 6-20a
B 3/4 6-5	B 3/4 6-5
-- --	B 3/4 6-5a

CONTAINMENT SYSTEMS

SUPPRESSION POOL - REACTOR BUILDING VACUUM BREAKERS

LIMITING CONDITION FOR OPERATION

3.6.4.2 All suppression pool-Reactor Building vacuum breakers shall be OPERABLE with:

a. an opening setpoint of less than or equal to 0.5 psid

b. an OPERABLE Nitrogen Backup System consisting of two independent subsystems (one subsystem for each vacuum breaker).

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With one suppression pool-Reactor Building vacuum breaker inoperable for opening but known to be in the closed position, restore the inoperable vacuum breaker to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With one Nitrogen Backup System subsystem inoperable, verify the remaining subsystem is OPERABLE and restore the inoperable subsystem to OPERABLE status within 31 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

c. With both Nitrogen Backup System subsystems inoperable, restore at least one inoperable subsystem to OPERABLE status within 7 days; otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.4.2.1 Each suppression pool-Reactor Building vacuum breaker shall be demonstrated OPERABLE:

a. At least once per 92 days by:

   1. Manually verifying that each vacuum breaker check valve is free to open, and

   2. Cycling each vacuum breaker butterfly valve through at least one complete cycle of full travel.

b. At least once per 18 months by:

   1. Demonstrating that the force required to open each vacuum breaker check valve does not exceed 0.5 psid.

SURVEILLANCE REQUIREMENTS (Continued)

2. Demonstrating that the vacuum breaker butterfly valve opens at -0.45 ± 0.05 psid, drywell pressure going negative relative to Reactor Building pressure.

3. Visual inspections.

4.6.4.2.2 The Nitrogen Backup System shall be demonstrated OPERABLE:

a. At least once per 24 hours by verifying that each subsystem is pressurized to greater than or equal to 1130 psig.

b. At least once per 18 months by verifying that each subsystem maintains system pressure with a leakage rate of less than or equal to .65 SCFM at a starting pressure greater than or equal to 1130 psig.

c. At least once per 18 months by performing a logic system functional test to ensure actuation of the nitrogen backup system.

3/4.6.4 VACUUM RELIEF

Vacuum relief breakers are provided to equalize the pressure between the drywell and suppression pool and the suppression pool and reactor building. This system will maintain the structural integrity of the containment under conditions of large differential pressures.

The vacuum breakers between the drywell and the suppression pool must not be inoperable in the open position since this would allow bypassing of the suppression pool in case of an accident. There are an adequate number of valves to provide some redundancy so that operation may continue with no more than 2 vacuum breakers inoperable and secured in the closed position.

Each set of vacuum relief valves between the suppression chamber and reactor building provides 100% relief, which may by required in the unlikely event that negative pressures develop in the primary containment.

The Nitrogen Backup System provides backup motive power for these suppression pool-reactor building vacuum breakers on a loss of instrument air. The normal non-interruptible instrument air system for these vacuum breakers is designed as a Seismic Class I system supplied by air compressors powered from the emergency buses. The Nitrogen System serves as a backup to that air system and thus the loss of the Nitrogen System, or portions thereof, does not make the vacuum breakers inoperable. The design allows for the out of service times in Actions b and c. The Nitrogen Backup System is added to the Suppression Pool-Reactor Building Vacuum Breaker specification to satisfy NRC concerns relative to 10 CFR 50.44(c)(3) as addressed in the Brunswick Safety Evaluation Report dated October 30, 1986 concerning Generic Letter 84-09. Pressurization to 1130 psig assures sufficient system capacity to provide 24 hours of operation with design valve actuation and system leakage.

3/4.6.5 SECONDARY CONTAINMENT

Secondary containment is designed to minimize any ground level release of radioactive material which may result from an accident. The reactor building provides secondary containment during normal operation when the drywell is sealed and in service. When the reactor is shut down, or during refueling, the drywell may be open and the reactor building then becomes the primary containment.

Establishing and maintaining a vacuum in the building with the standby gas treatment system, once per 18 months, along with the surveillance of the valves, is adequate to ensure that there are no violations of the integrity of the secondary containment.

3/4.6.6 CONTAINMENT ATMOSPHERE CONTROL

The OPERABILITY of the containment iodine filter trains ensures that sufficient iodine removal capability will be available in the event of a LOCA. The reduction in containment iodine inventory reduces the resulting

BASES (Continued)

site boundary radiation doses associated with containment leakage. The operation of this system and resultant iodine removal capacity are consistent with the assumptions used in the LOCA analyses.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-324

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 138
License No. DPR-62

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Carolina Power & Light Company (the licensee), dated March 27, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 2.C.(2) of Facility Operating License No. DPR-62 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No.138 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Elinor G. Adensam, Director
Project Directorate II-1
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance:

BCR for PDA

LA:PD21:DRPR	PM:PD21:DPRP	D:PD21:DRPR	OGC-B
PAnderson	ESylvester	EAdensam	EJS for Charles Barth
7/31/87	7/31/87	7/31/87	7/31/87

ATTACHMENT TO LICENSE AMENDMENT NO. 138

FACILITY OPERATING LICENSE NO. DPR-62

DOCKET NO. 50-324

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove Pages	Insert Pages
3/4 6-20	3/4 6-20
-- --	3/4 6-20a
B 3/4 6-5	B 3/4 6-5
-- --	B 3/4 6-5a

CONTAINMENT SYSTEMS

SUPPRESSION POOL - REACTOR BUILDING VACUUM BREAKERS

LIMITING CONDITION FOR OPERATION

3.6.4.2 All suppression pool-Reactor Building vacuum breakers shall be OPERABLE with:

a. an opening setpoint of less than or equal to 0.5 psid

b. an OPERABLE Nitrogen Backup System consisting of two independent subsystems (one subsystem for each vacuum breaker).

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With one suppression pool-Reactor Building vacuum breaker inoperable for opening but known to be in the closed position, restore the inoperable vacuum breaker to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With one Nitrogen Backup System subsystem inoperable, verify the remaining subsystem is OPERABLE and restore the inoperable subsystem to OPERABLE status within 31 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

c. With both Nitrogen Backup System subsystems inoperable, restore at least one inoperable subsystem to OPERABLE status within 7 days; otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.4.2.1 Each suppression pool-Reactor Building vacuum breaker shall be demonstrated OPERABLE:

a. At least once per 92 days by:

   1. Manually verifying that each vacuum breaker check valve is free to open, and

   2. Cycling each vacuum breaker butterfly valve through at least one complete cycle of full travel.

b. At least once per 18 months by:

   1. Demonstrating that the force required to open each vacuum breaker check valve does not exceed 0.5 psid.

SURVEILLANCE REQUIREMENTS (Continued)

2. Demonstrating that the vacuum breaker butterfly valve opens at -0.45 ± 0.05 psid, drywell pressure going negative relative to Reactor Building pressure.

3. Visual inspections.

4.6.4.2.2 The Nitrogen Backup System shall be demonstrated OPERABLE:

a. At least once per 24 hours by verifying that each subsystem is pressurized to greater than or equal to 1130 psig.

b. At least once per 18 months by verifying that each subsystem maintains system pressure with a leakage rate of less than or equal to .65 SCFM at a starting pressure greater than or equal to 1130 psig.

c. At least once per 18 months by performing a logic system functional test to ensure actuation of the nitrogen backup system.

3/4.6.4 VACUUM RELIEF

Vacuum relief breakers are provided to equalize the pressure between the drywell and suppression pool and the suppression pool and reactor building. This system will maintain the structural integrity of the containment under conditions of large differential pressures.

The vacuum breakers between the drywell and the suppression pool must not be inoperable in the open position since this would allow bypassing of the suppression pool in case of an accident. There are an adequate number of valves to provide some redundancy so that operation may continue with no more than 2 vacuum breakers inoperable and secured in the closed position.

Each set of vacuum relief valves between the suppression chamber and reactor building provides 100% relief, which may be required in the unlikely event that negative pressures develop in the primary containment.

The Nitrogen Backup System provides backup motive power for these suppression pool-reactor building vacuum breakers on a loss of instrument air. The normal non-interruptible instrument air system for these vacuum breakers is designed as a Seismic Class I system supplied by air compressors powered from the emergency buses. The Nitrogen System serves as a backup to the air system and thus the loss of the Nitrogen System, or portions thereof, does not make the vacuum breakers inoperable. This design allows for the out of service times in Actions b and c. The Nitrogen Backup System is added to the Suppression Pool-Reactor Building Vacuum Breaker specification to satisfy NRC concerns relative to 10 CFR 50.44(c)(3) as addressed in the Brunswick Safety Evaluation Report dated October 30, 1986 concerning Generic Letter 84-09. Pressurization to 1130 psig assures sufficient system capacity to provide 24 hours of operation with design valve actuation and system leakage.

3/4.6.5 SECONDARY CONTAINMENT

Secondary containment is designed to minimize any ground level release of radioactive material which may result from an accident. The reactor building provides secondary containment during normal operation when the drywell is sealed and in service. When the reactor is shut down or during refueling the drywell may be open and the reactor building then becomes the primary containment.

Establishing and maintaining a vacuum in the building with the standby gas treatment system, once per 18 months, along with the surveillance of the valves, is adequate to ensure that there are no violations of the integrity of the secondary containment.

3/4.6.6 CONTAINMENT ATMOSPHERE CONTROL

The OPERABILITY of the containment iodine filter trains ensures that sufficient iodine removal capability will be available in the event of a LOCA. The reduction of containment iodine inventory reduces the resulting

BASES (Continued)

site boundary radiation doses associated with containment leakage. The operation of this system and resultant iodine removal capacity are consistent with the assumptions used in the LOCA analyses.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 111 TO FACILITY OPERATING LICENSE NO. DPR-71

AND AMENDMENT NO. 138 TO FACILITY OPERATING LICENSE NO. DPR-62

CAROLINA POWER & LIGHT COMPANY

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2

DOCKET NOS. 50-325 AND 50-324

1.0 INTRODUCTION

By letter dated March 27, 1987, Carolina Power & Light Company, (the licensee), submitted a request for changes to the Technical Specifications (TS) for the Brunswick Steam Electric Plant, Units 1 and 2. The proposed changes incorporate requirements for nitrogen backup system operability, as requested by the NRC in accordance with guidance of Generic Letter (GL) 84-09 which requests removal of potential oxygen sources from the primary containment.

2.0 BACKGROUND

In response to GL 84-09, the licensee made several submittals (dated June 8, 1984, June 27, 1984, March 1, 1985, July 18, 1985, and March 20, 1986), in which they attempted to demonstrate that Brunswick Units 1 and 2 do not require hydrogen recombiners to control combustible gases after an accident. The intent was to demonstrate compliance with the guidance of GL 84-09 without hydrogen recombiner capability.

As a result of the NRC staff's review of information supplied by the licensee, a Safety Evaluation (SE) was issued on October 30, 1986. The NRC staff evaluation outlined five additional actions that, if committed to, would show compliance with the intent of the generic letter. These actions would be in addition to the previous information and commitments provided to the NRC staff. The licensee responded to the NRC staff's concerns by addressing the five actions in a letter dated December 19, 1986. A meeting was held on March 18, 1987, between the NRC staff and the licensee, to clarify the December 19 letter and discuss incorporating the nitrogen backup system into the TS. On March 27, 1987, the licensee submitted an amendment request reflecting discussions and agreements from that meeting.

3.0 EVALUATION

For clarity, this evaluation addresses, in order, the five actions established in the October 30, 1986, SE. The first and most significant action was to require automatic isolation of the non-essential instrument air system upon receipt of a containment isolation signal. The licensee responded by indicating that a direct acting solenoid valve will isolate the system upon receipt of a LOCA signal. In addition, a second identical valve will be added during the next refueling outage to accommodate a single active failure. Both valves, however, will retain an override function to allow the operator to reopen the valves with a LOCA signal received.

The NRC staff concludes that the licensee has met the intent of this action. Although signal override would not normally be viewed as satisfying this condition, the backup nitrogen system is of safety grade quality and has been designed for maximum availability. This causes the staff to view the override option as a last resort action and, therefore, it is acceptable.

The second action, which was requested by the NRC staff, was to provide verification that the essential nitrogen supply is a safety grade system which automatically supplies the instrument air system upon receipt of a containment isolation signal. The licensee has shown that all aspects of this action have been met.

The third and fourth actions concern the testing, surveillance and limiting conditions of operation (LCO) for the essential nitrogen system for incorporation into the TS. The licensee has responded positively to these requests by submitting proposed TS changes via the letter dated March 27, 1987. Nitrogen pressure will be verified every 24 hours to be at least 1130 psig and a complete system leak check coupled with a functional logic check will be performed at least once per 18 months. Additionally, two LCO's have been added to the TS. With both nitrogen systems inoperable, one system must be restored within 7 days or the plant will shutdown. With only one system operable, the other system must be returned to operability within 31 days or the plant will shutdown.

The NRC staff has reviewed the proposed TS changes and concurs with the licensee's requested changes. The times associated with the LCOs appear to be appropriate since the systems that are supplied with the nitrogen supply remain operable through the normal instrument air system.

The final action requested by the NRC staff was the verification that the plant operating procedures are consistent with the committed actions listed above. All procedures that call for supplying air into the containment after receipt of the containment isolation signal were to be removed. The licensee has indicated that a review of the operating procedures has demonstrated consistency with the above actions with these exceptions: the recognized need for air supply to the MSIVs and emergency depressurization for specific transients. These operations are in accordance

with the BWR Owners' Group Emergency Procedure Guidelines.

The NRC staff has reviewed these deviations and agrees that these actions are needed to improve the safety of the plant and do not violate the intent of the above requested actions. The need for the air into the containment is for a limited time period. Once the component is actuated, the need for the air supply is eliminated, and the air can be reisolated from the containment. The brief time the air is required in the containment is more than offset by the benefits gained by restoration of the component in question.

Based on the above, the staff concludes that the licensee has removed all credible oxygen sources from the containment and has demonstrated compliance with the guidance contained in GL 84-09, "Recombiner Capability Requirements of 10 CFR 50.44(c)(3)(ii)." Therefore, the licensee has shown that the existing systems are adequate to accommodate possible transients without the need for the added recombiner capability.

4.0 ENVIRONMENTAL CONSIDERATIONS

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(9). Pursuant to 10 CFR §51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission made a determination that these Amendments involve no significant hazards consideration which was published in the FEDERAL REGISTER (52 FR 18973) on May 20, 1987, and consulted with the State of North Carolina. No public comments or requests for hearing were received, and the State of North Carolina did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Kudrick, Plant Systems Branch, NRR

Dated: August 20, 1987