



OCT 25 2002

SERIAL: BSEP 02-0177

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
SUBMITTAL OF TECHNICAL SPECIFICATION BASES CHANGES FOR
REVISIONS 28 (UNIT 1) AND 25 (UNIT 2)

Ladies and Gentlemen:

In accordance with Technical Specification (TS) 5.5.10 for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, Carolina Power & Light (CP&L) Company is submitting Revisions 28 and 25 to the BSEP, Unit 1 and 2 TS Bases, respectively. Revisions 28 and 25 were implemented on October 15, 2002.

Please refer any questions regarding this submittal to Mr. Leonard R. Beller, Supervisor - Licensing/Regulatory Programs, at (910) 457-2073.

Sincerely,

Edward T. O'Neil
Manager - Regulatory Affairs
Brunswick Steam Electric Plant

CRE/cre

Enclosures:

1. Summary of Revisions to Technical Specification Bases
2. Technical Specification Bases Pages Replacement Instructions
3. Replacement Bases Pages – Units 1 and 2

A001

Document Control Desk
BSEP 02-0177 / Page 2

cc (with enclosures):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Mr. Luis A. Reyes, Regional Administrator
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303-8931

U. S. Nuclear Regulatory Commission
ATTN: Mr. Theodore A. Easlick, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission **(Electronic Copy Only)**
ATTN: Ms. Brenda L. Mozafari (Mail Stop OWFN 8G9)
11555 Rockville Pike
Rockville, MD 20852-2738

Ms. Jo A. Sanford
Chair - North Carolina Utilities Commission
P.O. Box 29510
Raleigh, NC 27626-0510

Ms. Beverly O. Hall, Section Chief
Radiation Protection Section, Division of Radiation Protection
North Carolina Department of Environment and Natural Resources
3825 Barrett Drive
Raleigh, NC 27609-7221

Summary of Revisions to Technical Specification Bases

Summary of Revision to Technical Specification Bases			
Revision	Affected Units	Date Implemented	Title/Description
28 25	Unit 1 Unit 2	October 15, 2002	Title: Surveillance Requirement Applicability Description: This change clarifies the Bases for Surveillance Requirement 3.0.3 to provide discussion covering risk evaluation and management in the event of a missed surveillance.

Technical Specification Bases Page Replacements Instructions

Unit 1	
Remove	Insert
Bases Book 1	
Title Page, Revision 27	Title Page, Revision 28
LOEP-1, Revision 27	LOEP-1, Revision 28
B 3.0-13, Revision 0	B 3.0-13, Revision 28
B 3.0-14, Revision 0	B 3.0-14, Revision 28
B 3.0-15, Revision 0	B 3.0-15, Revision 28
	B 3.0-16, Revision 28

Unit 2	
Remove	Insert
Bases Book 1	
Title Page, Revision 24	Title Page, Revision 25
LOEP-1, Revision 24	LOEP-1, Revision 25
B 3.0-13, Revision 0	B 3.0-13, Revision 25
B 3.0-14, Revision 0	B 3.0-14, Revision 25
B 3.0-15, Revision 0	B 3.0-15, Revision 25
	B 3.0-16, Revision 25

BSEP 02-0177
Enclosure 3

Replacement Bases Pages – Units 1 and 2

BASES
TO
THE FACILITY OPERATING LICENSE DPR-71
TECHNICAL SPECIFICATIONS
FOR
BRUNSWICK STEAM ELECTRIC PLANT
UNIT 1
CAROLINA POWER & LIGHT COMPANY

REVISION 28

LIST OF EFFECTIVE PAGES - BASES

<u>Page No.</u>	<u>Revision No.</u>	<u>Page No.</u>	<u>Revision No.</u>
Title Page	28	B 3.1-7	0
		B 3.1-8	0
List of Effective Pages - Book 1		B 3.1-9	0
		B 3.1-10	0
LOEP-1	28	B 3.1-11	0
LOEP-2	25	B 3.1-12	0
LOEP-3	24	B 3.1-13	0
LOEP-4	27	B 3.1-14	0
		B 3.1-15	0
i	21	B 3.1-16	0
ii	21	B 3.1-17	25
		B 3.1-18	25
B 2.0-1	0	B 3.1-19	0
B 2.0-2	0	B 3.1-20	0
B 2.0-3	25	B 3.1-21	0
B 2.0-4	24	B 3.1-22	0
B 2.0-5	24	B 3.1-23	0
B 2.0-6	24	B 3.1-24	23
B 2.0-7	24	B 3.1-25	0
B 2.0-8	0	B 3.1-26	23
		B 3.1-27	23
B 3.0-1	0	B 3.1-28	0
B 3.0-2	0	B 3.1-29	0
B 3.0-3	0	B 3.1-30	0
B 3.0-4	0	B 3.1-31	0
B 3.0-5	0	B 3.1-32	0
B 3.0-6	0	B 3.1-33	25
B 3.0-7	0	B 3.1-34	25
B 3.0-8	0	B 3.1-35	25
B 3.0-9	0	B 3.1-36	25
B 3.0-10	0	B 3.1-37	24
B 3.0-11	0	B 3.1-38	24
B 3.0-12	0	B 3.1-39	24
B 3.0-13	28	B 3.1-40	24
B 3.0-14	28	B 3.1-41	24
B 3.0-15	28	B 3.1-42	24
B 3.0-16	28	B 3.1-43	24
		B 3.1-44	24
B 3.1-1	0	B 3.1-45	0
B 3.1-2	0	B 3.1-46	0
B 3.1-3	0	B 3.1-47	0
B 3.1-4	0	B 3.1-48	24
B 3.1-5	0		
B 3.1-6	0		

(continued)

BASES (continued)

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend

(continued)

BASES

SR 3.0.3
(continued)

Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

(continued)

BASES

SR 3.0.3
(continued) Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4 SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that Surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

(continued)

BASES

SR 3.0.4
(continued)

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3, 4 or 5, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of SR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

**BASES
TO
THE FACILITY OPERATING LICENSE DPR-62
TECHNICAL SPECIFICATIONS
FOR
BRUNSWICK STEAM ELECTRIC PLANT
UNIT 2
CAROLINA POWER & LIGHT COMPANY**

REVISION 25

LIST OF EFFECTIVE PAGES - BASES

<u>Page No.</u>	<u>Revision No.</u>	<u>Page No.</u>	<u>Revision No.</u>
Title Page	25	B 3.1-7	0
		B 3.1-8	0
List of Effective Pages - Book 1		B 3.1-9	0
		B 3.1-10	0
LOEP-1	25	B 3.1-11	0
LOEP-2	3	B 3.1-12	0
LOEP-3	12	B 3.1-13	0
LOEP-4	24	B 3.1-14	0
		B 3.1-15	0
i	0	B 3.1-16	0
ii	0	B 3.1-17	0
		B 3.1-18	0
B 2.0-1	0	B 3.1-19	0
B 2.0-2	0	B 3.1-20	0
B 2.0-3	0	B 3.1-21	0
B 2.0-4	0	B 3.1-22	0
B 2.0-5	0	B 3.1-23	0
B 2.0-6	0	B 3.1-24	22
B 2.0-7	0	B 3.1-25	0
B 2.0-8	0	B 3.1-26	22
		B 3.1-27	22
B 3.0-1	0	B 3.1-28	0
B 3.0-2	0	B 3.1-29	0
B 3.0-3	0	B 3.1-30	0
B 3.0-4	0	B 3.1-31	0
B 3.0-5	0	B 3.1-32	0
B 3.0-6	0	B 3.1-33	0
B 3.0-7	0	B 3.1-34	0
B 3.0-8	0	B 3.1-35	0
B 3.0-9	0	B 3.1-36	0
B 3.0-10	0	B 3.1-37	0
B 3.0-11	0	B 3.1-38	0
B 3.0-12	0	B 3.1-39	0
B 3.0-13	25	B 3.1-40	0
B 3.0-14	25	B 3.1-41	0
B 3.0-15	25	B 3.1-42	0
B 3.0-16	25	B 3.1-43	0
		B 3.1-44	0
B 3.1-1	0	B 3.1-45	0
B 3.1-2	0	B 3.1-46	0
B 3.1-3	0	B 3.1-47	0
B 3.1-4	0	B 3.1-48	0
B 3.1-5	0		
B 3.1-6	0		

(continued)

BASES (continued)

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend

(continued)

BASES

SR 3.0.3
(continued)

Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

(continued)

BASES

SR 3.0.3
(continued) Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4 SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that Surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

(continued)

BASES

SR 3.0.4

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3, 4 or 5, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of SR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.
