



Cornelius J. Gannon
Vice President
Brunswick Nuclear Plant
Progress Energy Carolinas, Inc.

SEP 03 2004

SERIAL: BSEP 04-0124
TSC-2003-05

10 CFR 50.90

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

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324/License Nos. DPR-71 and DPR-62
Application for Technical Specification Change Regarding Mode Change
Limitations Using the Consolidated Line Item Improvement Process

References: Letter dated December 19, 2003, from C. S. Hinnant to Document Control
Desk, Application for Technical Specification Change Regarding Mode
Change Limitations Using the Consolidated Line Item Improvement
Process, Serial Number PE&RAS 03-127, ADAMS Accession Number
ML033600115.

Ladies and Gentlemen:

On December 19, 2003, Carolina Power & Light (CP&L) Company, now doing business as Progress Energy Carolinas, Inc., (PEC), requested a revision to the Technical Specifications (TSs) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, the H. B. Robinson Plant, Unit 2, and the Crystal River Plant, Unit 3. The proposed license amendments revise TSs that limit mode changes per the Limiting Conditions for Operation described in TS Section 3.0.4 and Surveillance Requirement (SR) 3.0.4.

The purpose of this letter is to provide revised, typed TS pages for BSEP, Units 1 and 2, which incorporate two administrative changes. The changes are summarized below:

1. LCO 3.0.4.b has been revised to include the phrase "determination of." This phrase was included in the hand mark-ups of the submittal, but was inadvertently omitted from the typed TS pages provided with the submittal.
2. A change has been made to the heading for the note under the ACTION section of TS 3.5.3. The heading has been revised from "NOTES" to "NOTE" to reflect that only one note remains.

The enclosed TS pages 3.0-2 and 3.5-12 for BSEP, Units 1 and 2 are replacements for those provided in the December 19, 2003, submittal; the other typed pages submitted on December 19, 2003, remain valid.

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ADD

PEC has determined that these administrative changes do not impact the conclusions of the no significant hazards consideration determination (NSHCD) published in the *Federal Register* on April 4, 2003, as part of the Consolidated Line Item Improvement Process or the BSEP-specific NSHCD published in the *Federal Register* on February 17, 2004.

In accordance with 10 CFR 50.91(b), PEC is providing the State of North Carolina a copy of these administrative changes to the proposed BSEP license amendments.

No regulatory commitments are contained in this letter. Please refer any questions regarding this submittal to Mr. Edward T. O'Neil, Manager - Support Services, at (910) 457-3512.

Sincerely,



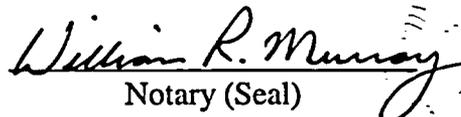
Cornelius J. Gannon

WRM/wrm

Enclosures:

1. Typed Technical Specification Pages - Unit 1
2. Typed Technical Specification Pages - Unit 2
3. List of Regulatory Commitments

Cornelius J. Gannon, 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, and agents of Carolina Power & Light Company.


Notary (Seal)



My commission expires: **May 18, 2008**

cc (with enclosures):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Dr. William D. Travers, Regional Administrator
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303-8931

U. S. Nuclear Regulatory Commission
ATTN: Mr. Eugene M. DiPaolo, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission
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 Environmental Health
North Carolina Department of Environment and Natural Resources
3825 Barrett Drive
Raleigh, NC 27609-7221

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Enclosure 1

Typed Technical Specification Pages - Unit 1

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.11, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,
MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS

----- NOTE -----
LCO 3.0.4.b is not applicable to RCIC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCIC System inoperable.	A.1 Verify by administrative means High Pressure Coolant Injection System is OPERABLE.	Immediately
	<u>AND</u> A.2 Restore RCIC System to OPERABLE status.	14 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Reduce reactor steam dome pressure to ≤ 150 psig.	36 hours

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Enclosure 2

Typed Technical Specification Pages - Unit 2

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or
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	<u>AND</u> B.2 Reduce reactor steam dome pressure to ≤ 150 psig.	36 hours

List of Regulatory Commitments

The following table identifies those actions committed to by Carolina Power & Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC), in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to the Manager - Support Services at the Brunswick Steam Electric Plant.

Commitment	Schedule
1. None.	N/A