



Progress Energy

Benjamin C. Waldrep
Vice President
Brunswick Nuclear Plant
Progress Energy Carolinas, Inc.

June 19, 2008

SERIAL: BSEP 08-0082
TSC-2008-01

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
Request for License Amendment - Adoption of TSTF-475, Revision 1 -
Revision of Control Rod Notch Surveillance Test Frequency and a
Clarification of a Frequency Example Using the Consolidated Line Item
Improvement Process

Ladies and Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., is requesting a revision to the Technical Specifications (TS) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2.

The proposed amendment would: (1) revise the TS surveillance requirement frequency in TS 3.1.3, "Control Rod Operability," and (2) revise Example 1.4-3 in Section 1.4, "Frequency," to clarify the applicability of the 1.25 surveillance test interval extension. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard TS change TSTF-475, Revision 1. The Federal Register notice published on November 13, 2007, announced the availability of this TS improvement through the consolidated line item improvement process. An evaluation of the proposed license amendments is provided in Enclosure 1.

CP&L is providing, in accordance with 10 CFR 50.91(b), a copy of the proposed license amendment to the designated representative for the State of North Carolina.

CP&L requests approval of the proposed amendment by January 16, 2009, and that once approved, the amendment shall be implemented within 60 days.

The regulatory commitment associated with this submittal is listed in Enclosure 6. Please refer any questions regarding this submittal to Mr. Gene Atkinson, Supervisor - Licensing/Regulatory Programs, at (910) 457-2056.

P.O. Box 10429
Southport, NC 28461

T > 910.457.3698

A001
NR2

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June 19, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "By C. Waldrep".

Benjamin C. Waldrep

MAT/mat

Enclosures:

1. Evaluation of Proposed License Amendment Request
2. Marked-up Technical Specification Pages - Unit 1
3. Typed Technical Specification Pages - Unit 1
4. Typed Technical Specification Pages - Unit 2
5. Marked-up Technical Specification Bases Pages - Unit 1 (For Information Only)
6. List of Regulatory Commitments

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. Joseph D. Austin, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission **(Electronic Copy Only)**
ATTN: Mrs. Farideh E. Saba (Mail Stop OWFN 8G9A)
11555 Rockville Pike
Rockville, MD 20852-2738

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

Evaluation of Proposed License Amendment Request

Subject: Request for License Amendment - Adoption of TSTF-475, Revision 1 -
Revision of Control Rod Notch Surveillance Test Frequency and a Clarification
of a Frequency Example Using the Consolidated Line Item Improvement
Process

1.0 Description

This letter is a request by Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., to amend the Technical Specifications (TS) of Renewed Facility Operating Licenses DPR-71 and DPR-62 for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2.

The proposed amendment would: (1) revise the TS surveillance requirement (SR) 3.1.3.2 frequency in TS 3.1.3, "Control Rod Operability," and (2) revise Example 1.4-3 in Section 1.4, "Frequency" to clarify the applicability of the 1.25 surveillance test interval extension.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard TS (STS) change TSTF-475, Revision 1. The Federal Register notice published on November 13, 2007, announced the availability of this TS improvement through the consolidated line item improvement process (CLIIP).

2.0 Assessment

2.1 *Applicability of Published Safety Evaluation*

CP&L has reviewed the safety evaluation dated November 13, 2007, as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-475, Revision 1. CP&L has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to BSEP Units 1 and 2 and justify this amendment for the incorporation of the changes to the BSEP TS.

2.2 *Optional Changes and Variations*

CP&L is not proposing any variations or deviations from the TS changes described in the modified TSTF-475, Revision 1, and the NRC staff's model safety evaluation dated November 13, 2007.

The approved TSTF-475 included three changes: (1) the proposed change to the frequency of SR 3.1.3.2, (2) clarifies the requirement to fully insert all insertable control rods for the LCO in TS 3.3.1.2, Required Action E.2, "Source Range Monitoring Instrumentation," and

(3) revises Example 1.4-3 in Section 1.4, "Frequency" to clarify the applicability of the 1.25 surveillance test interval extension. BSEP Unit 1 and 2 TS 3.3.1.2, Required Action E.2, currently includes the requirement to "fully insert all insertable control rods." As such, this change is not required for BSEP.

An administrative change is being made to the Notes associated with SR 3.1.3.3 (i.e., the existing SR designation) for Unit 1. Amendment 210 for Unit 1, issued on May 23, 2000 (i.e., Accession Number ML003718232), modified the SR to include a cycle-specific Note associated with testing of Control Rod 26-47. This note has expired and, as such, is being removed. This change is purely administrative in nature and does not affect the applicability of either the safety evaluation or the no significant hazards consideration determination published in the Federal Register as part of the CLIP.

3.0 Regulatory Analysis

3.1 No Significant Hazards Consideration Determination

CP&L has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIP. CP&L has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to BSEP Units 1 and 2 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on November 13, 2007, for this TS improvement, CP&L verifies the applicability of TSTF-475 to BSEP Units 1 and 2, and commits to establishing Bases for TS as proposed in Enclosure 5.

These changes are based on TSTF change traveler TSTF-475, Revision 1, that proposes revisions to the STS by: (1) revising the frequency of SR 3.1.3.2, notch testing of fully withdrawn control rods, from "7 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM" to "31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM," and (2) revising Example 1.4-3 in Section 1.4, "Frequency" to clarify that the 1.25 surveillance test interval extension in SR 3.0.2 is applicable to time periods discussed in NOTES in the "SURVEILLANCE" column in addition to the time periods in the "FREQUENCY" column.

4.0 Environmental Evaluation

CP&L has reviewed the environmental evaluation included in the model safety evaluation dated November 13, 2007, as part of the CLIP. CP&L has concluded that the staff's findings presented in that evaluation are applicable to BSEP Units 1 and 2 and the evaluation is hereby incorporated by reference for this application.

BSEP 08-0082
Enclosure 2

Markup of Technical Specification Pages - Unit 1

1.4 Frequency

EXAMPLES
(continued)

EXAMPLE 1.4-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>-----NOTE----- Not required to be performed until 12 hours after ≥ 25% RTP. -----</p>	
<p>Perform channel adjustment.</p>	<p>7 days</p>

The interval continues whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required performance of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be within the "specified Frequency."

Therefore, if the Surveillance were not performed within the 7 day interval (plus the extension allowed by SR 3.0.2), but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours with power ≥ 25% RTP.

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

(continued)

(plus the extension allowed by SR 3.0.2)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.3.1	Determine the position of each control rod.	24 hours
SR 3.1.3.2	<p>NOTE</p> <p>Not required to be performed until 7 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of RWM.</p> <p>Insert each fully withdrawn control rod at least one notch.</p>	7 days
SR 3.1.3.3	<p>NOTES</p> <p>Not required to be performed until 31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM.</p> <p>For Cycle 13 only, SR 3.1.3.3 can be satisfied for control rod 26-47 by verifying inward motion versus inserting at least one notch.</p>	
	Insert each <u>partially</u> withdrawn control rod at least one notch.	31 days
SR 3.1.3.4	Verify each control rod scram time from fully withdrawn to notch position 06 is ≤ 7 seconds.	In accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.1.3.5 <u>4</u> Verify each control rod does not go to the withdrawn overtravel position.	Each time the control rod is withdrawn to "full out" position <u>AND</u> Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling

Table 3.1.4-1 (page 1 of 1)
Control Rod Scram Times

-----NOTES-----

1. OPERABLE control rods with scram times not within the limits of this Table are considered "slow."
2. Enter applicable Conditions and Required Actions of LCO 3.1.3, "Control Rod OPERABILITY," for control rods with scram times > 7 seconds to notch position 06. These control rods are inoperable, in accordance with SR 3.1.3.4, and are not considered "slow."

③

NOTCH POSITION	SCRAM TIMES WHEN REACTOR STEAM DOME PRESSURE ≥ 800 psig ^{(a)(b)} (seconds)
46	0.44
36	1.08
26	1.83
06	3.35

- (a) Maximum scram time from fully withdrawn position, based on de-energization of scram pilot valve solenoids at time zero.
- (b) When reactor steam dome pressure is < 800 psig, established scram time limits apply.

BSEP 08-0082
Enclosure 3

Typed Technical Specification Pages - Unit 1

1.4 Frequency

EXAMPLES
(continued)

EXAMPLE 1.4-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>-----NOTE----- Not required to be performed until 12 hours after ≥ 25% RTP. -----</p>	
<p>Perform channel adjustment.</p>	<p>7 days</p>

The interval continues whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required performance of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be within the "specified Frequency." Therefore, if the Surveillance were not performed within the 7 day interval (plus the extension allowed by SR 3.0.2), but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours (plus the extension allowed by SR 3.0.2) with power ≥ 25% RTP.

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval (plus the extension allowed by SR 3.0.2), there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.3.1	Determine the position of each control rod.	24 hours
SR 3.1.3.2	<p>-----NOTE----- Not required to be performed until 31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM. -----</p> <p>Insert each withdrawn control rod at least one notch.</p>	31 days
SR 3.1.3.3	Verify each control rod scram time from fully withdrawn to notch position 06 is ≤ 7 seconds.	In accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.1.3.4	Verify each control rod does not go to the withdrawn overtravel position.	Each time the control rod is withdrawn to "full out" position <u>AND</u> Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling

Table 3.1.4-1 (page 1 of 1)
Control Rod Scram Times

-----NOTES-----

1. OPERABLE control rods with scram times not within the limits of this Table are considered "slow."
2. Enter applicable Conditions and Required Actions of LCO 3.1.3, "Control Rod OPERABILITY," for control rods with scram times > 7 seconds to notch position 06. These control rods are inoperable, in accordance with SR 3.1.3.3, and are not considered "slow."

NOTCH POSITION	SCRAM TIMES WHEN REACTOR STEAM DOME PRESSURE \geq 800 psig ^{(a)(b)} (seconds)
46	0.44
36	1.08
26	1.83
06	3.35

- (a) Maximum scram time from fully withdrawn position, based on de-energization of scram pilot valve solenoids at time zero.
- (b) When reactor steam dome pressure is < 800 psig, established scram time limits apply.

BSEP 08-0082
Enclosure 4

Typed Technical Specification Pages - Unit 2

1.4 Frequency

EXAMPLES
(continued)

EXAMPLE 1.4-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p>Not required to be performed until 12 hours after $\geq 25\%$ RTP.</p> <p>-----</p>	
<p>Perform channel adjustment.</p>	<p>7 days</p>

The interval continues whether or not the unit operation is $< 25\%$ RTP between performances.

As the Note modifies the required performance of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is $< 25\%$ RTP, this Note allows 12 hours after power reaches $\geq 25\%$ RTP to perform the Surveillance. The Surveillance is still considered to be within the "specified Frequency." Therefore, if the Surveillance were not performed within the 7 day interval (plus the extension allowed by SR 3.0.2), but operation was $< 25\%$ RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours (plus the extension allowed by SR 3.0.2) with power $\geq 25\%$ RTP.

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval (plus the extension allowed by SR 3.0.2), there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.3.1	Determine the position of each control rod.	24 hours
SR 3.1.3.2	<p>-----NOTE----- Not required to be performed until 31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM. -----</p> <p>Insert each withdrawn control rod at least one notch.</p>	31 days
SR 3.1.3.3	Verify each control rod scram time from fully withdrawn to notch position 06 is ≤ 7 seconds.	In accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.1.3.4	Verify each control rod does not go to the withdrawn overtravel position.	Each time the control rod is withdrawn to "full out" position <u>AND</u> Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling

Table 3.1.4-1 (page 1 of 1)
Control Rod Scram Times

-----NOTES-----

1. OPERABLE control rods with scram times not within the limits of this Table are considered "slow."
2. Enter applicable Conditions and Required Actions of LCO 3.1.3, "Control Rod OPERABILITY," for control rods with scram times > 7 seconds to notch position 06. These control rods are inoperable, in accordance with SR 3.1.3.3, and are not considered "slow."

NOTCH POSITION	SCRAM TIMES WHEN REACTOR STEAM DOME PRESSURE \geq 800 psig ^{(a)(b)} (seconds)
46	0.44
36	1.08
26	1.83
06	3.35

- (a) Maximum scram time from fully withdrawn position, based on de-energization of scram pilot valve solenoids at time zero.
- (b) When reactor steam dome pressure is < 800 psig, established scram time limits apply.

BSEP 08-0082
Enclosure 5

Marked-up Technical Specification Bases Pages - Unit 1
(For Information Only)

BASES

ACTIONS

A.1, A.2, A.3, and A.4 (continued)

control rod occupies a location adjacent to one "slow" control rod and the one "slow" control rod occupies a location adjacent to another "slow" control rod, or c) the stuck control rod occupies a location adjacent to one "slow" control rod when there is another pair of "slow" control rods adjacent to one another located anywhere in the core. The description of "slow" control rods is provided in LCO 3.1.4.

In addition, the associated control rod drive must be disarmed in 2 hours (Required Action A.2). The allowed Completion Time of 2 hours is acceptable, considering the reactor can still be shut down, and provides a reasonable time to perform the Required Action in an orderly manner. The control rod must be isolated from both scram pressure and normal insert and withdraw pressure. Isolating the control rod from scram pressure and normal insert and withdraw pressure prevents damage to the CRDM. The control rod should be isolated from scram pressure and normal insert and withdraw pressure while maintaining cooling water to the CRD.

Monitoring of the insertion capability of each withdrawn control rod must also be performed within 24 hours from discovery of Condition A concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM (Required Action A.3). SR 3.1.3.2 and SR 3.1.3.3 perform periodic tests of the control rod insertion capability of withdrawn control rods. Testing each withdrawn control rod ensures that a generic problem does not exist. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." The Required Action A.3 Completion Time only begins from discovery of Condition A concurrent with THERMAL POWER greater than the LPSP of the RWM since the notch insertions may not be compatible with the requirements of rod pattern control (LCO 3.1.6) and the RWM (LCO 3.3.2.1). The allowed Completion Time of 24 hours provides a reasonable time to test the control rods, considering the potential for a need to reduce power to perform the tests.

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BASES

ACTIONS
(continued)

E.1

If any Required Action and associated Completion Time of Condition A, C, or D are not met, or there are nine or more inoperable control rods, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 12 hours. This ensures all insertable control rods are inserted and places the reactor in a condition that does not require the active function (i.e., scram) of the control rods. The number of control rods permitted to be inoperable when operating above 8.75% RTP (e.g., no CRDA considerations) could be more than the value specified, but the occurrence of a large number of inoperable control rods could be indicative of a generic problem, and investigation and resolution of the potential problem should be undertaken. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTS

SR 3.1.3.1

The position of each control rod must be determined to ensure adequate information on control rod position is available to the operator for determining control rod OPERABILITY and controlling rod patterns. Control rod position may be determined by the use of OPERABLE reed switch position indicators (including "full-in" or "full-out" indication), by moving control rods to a position with an OPERABLE reed switch indicator, or by the use of other appropriate methods. The 24 hour Frequency of this SR is based on operating experience related to expected changes in control rod position and the availability of control rod position indications in the control room.

SR 3.1.3.2 and SR 3.1.3.3

Control rod insertion capability is demonstrated by inserting each partially or fully withdrawn control rod at least one notch and observing that the control rod moves. The control rod may then be returned to its original position. This ensures the control rod is not stuck and is free to insert on a scram signal. As noted, SR 3.1.3.2 and SR 3.1.3.3 are not required to be performed until ~~7 days and~~ 31 days, respectively, after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the

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(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.1.3.2 and SR 3.1.3.3 (continued)

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RWM. ~~These~~ ^{These} Notes acknowledge that the control rod must first be withdrawn and THERMAL POWER must be increased to above the LPSP of the RWM before performance of the Surveillance. Thus the Notes avoid potential conflicts with SR 3.0.3 and SR 3.0.4. ~~These~~ ^{These} Surveillances ~~are~~ ^{is} not required to be performed when THERMAL POWER is less than or equal to the LPSP of the RWM, since the notch insertions may not be compatible with the requirements of the BPWS (LCO 3.1.6) and the RWM (LCO 3.3.2.1). While performance of the SRs is exempted during this condition, the SRs must still be met. S

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~~The 7 day Frequency of SR 3.1.3.2 is based on operating experience related to the changes in CRD performance and the ease of performing notch testing for fully withdrawn control rods. Partially withdrawn control rods are tested at a 31 day Frequency, based on the potential power reduction required to allow the control rod movement and considering the large testing sample of SR 3.1.3.2. Furthermore, the 31 day Frequency takes into account operating experience related to changes in CRD performance. At any time, if a control rod is immovable, a determination of that control rod's trippability (OPERABILITY) must be made and appropriate action taken.~~

SR 3.1.3.4 S

Verifying that the scram time for each control rod to notch position 06 is ≤ 7 seconds provides reasonable assurance that the control rod will insert when required during a DBA or transient, thereby completing its shutdown function. This SR is performed in conjunction with the control rod scram time testing of SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4. The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," and the functional testing of SDV vent and drain valves in LCO 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," overlap this Surveillance to provide complete testing of the assumed safety function. The associated Frequencies are acceptable, considering the more frequent testing performed to demonstrate other aspects of control rod OPERABILITY and operating experience, which shows scram times do not significantly change over an operating cycle.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.1.3.9-4

Coupling verification is performed to ensure the control rod is connected to the CRDM and will perform its intended function when necessary. The Surveillance requires verifying a control rod does not go to the withdrawn overtravel position. The overtravel position feature provides a positive check on the coupling integrity since only an uncoupled CRD can reach the overtravel position. The verification is required to be performed any time a control rod is withdrawn to the "full out" position (notch position 48) or prior to declaring the control rod OPERABLE after work on the control rod or CRD System that could affect coupling. This includes performing the SR when control rods are inserted one notch and then returned to the "full out" position during the performance of SR 3.1.3.2. This Frequency is acceptable, considering the low probability that a control rod will become uncoupled when it is not being moved and operating experience related to uncoupling events.

REFERENCES

1. UFSAR, Sections 3.1.2.3.7.2, 3.1.2.3.8.2, 3.1.2.3.9.2, and 3.1.2.3.10.2.
 2. UFSAR, Section 4.2.1.1.8.
 3. UFSAR, Section 15.4.
 4. NEDC-32466P, Power Uprate Safety Analysis Report for Brunswick Steam Electric Plant Units 1 and 2, September 1995.
 5. 10 CFR 50.36(c)(2)(ii).
 6. NEDO-21231, Banked Position Withdrawal Sequence, Section 7.2, January 1977.
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BASES

LCO
(continued)

Table 3.1.4-1 is accomplished through measurement of the "dropout" times. To ensure that local scram reactivity rates are maintained within acceptable limits, no more than two of the allowed "slow" control rods may occupy adjacent locations.

Table 3.1.4-1 is modified by two Notes which state that control rods with scram times not within the limits of the Table are considered "slow" and that control rods with scram times > 7 seconds are considered inoperable per SR ~~3.1.3.4~~.

3.1.3.3

This LCO applies only to OPERABLE control rods since inoperable control rods will be inserted and disarmed (LCO 3.1.3). Slow scrambling control rods may be conservatively declared inoperable and not accounted for as "slow" control rods.

APPLICABILITY

In MODES 1 and 2, a scram is assumed to function during transients and accidents analyzed for these plant conditions. These events are assumed to occur during startup and power operation; therefore, the scram function of the control rods is required during these MODES. In MODES 3 and 4, the control rods are not able to be withdrawn since the reactor mode switch is in the shutdown position and a control rod block is applied. This provides adequate requirements for control rod scram capability during these conditions. Scram requirements in MODE 5 are contained in LCO 3.9.5, "Control Rod OPERABILITY=Refueling."

ACTIONS

A.1

When the requirements of this LCO are not met, the rate of negative reactivity insertion during a scram may not be within the assumptions of the safety analyses. Therefore, the plant must be brought to a MODE in which the LCO does not apply. To achieve this condition, the plant must be brought to MODE 3 within 12 hours. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

(continued)

List of Regulatory Commitments

The following table identifies those actions committed to by Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., 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 Mr. Gene Atkinson, Supervisor - Licensing/Regulatory Programs, at (910) 457-2056.

Commitment	Schedule
1. CP&L will establish the Technical Specification Bases for TS B 3.1.3 and TS B 3.1.4 consistent with those provided in Enclosure 5.	To be implemented with implementation of the amendment.