



Carolina Power & Light Company

September 16, 1980

FILE: NG-3514(B)

SERIAL NO.: NO-80-1355

Office of Nuclear Reactor Regulation
ATTENTION: Mr. T. A. Ippolito, Chief
Operating Reactors Branch No. 2
United States Nuclear Regulatory Commission
Washington, D. C. 20555

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 - CATEGORY "A" LESSONS LEARNED ITEMS

Dear Mr. Ippolito:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications and the Operating Licenses for its Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2.

The attached revisions to the Operating Licenses and Technical Specifications for the Brunswick units implement the changes requested by D. G. Eisenhut's letter of July 2, 1980, concerning Category "A" Lessons Learned items. Although CP&L does not agree with the finding of the Staff concerning the applicability of license fees for these revisions (Reference: D. G. Eisenhut's letter of August 7, 1980), our check for \$4,400 is attached for one Class III and one Class I amendment.

The enclosed revisions provide Technical Specifications, as requested, for Safety-Relief Valve Position Indications and in the area of shift manning to reflect the augmentation of the Shift Technical Advisor. As agreed to in a telephone conversation with your staff on September 2, 1980, CP&L will submit revised Technical Specifications in the area of Containment Isolation by December 31, 1980. Mr. Eisenhut's letter of July 2, 1980 requested Technical Specifications in the area of Emergency Power Supply/Inadequate Core Cooling. CP&L has determined that the existing Technical Specifications for the Brunswick Units adequately address this subject and therefore, no revisions are proposed for that area. Requested changes to the Technical Specifications are indicated by a vertical bar in the right-hand margin on the attached replacement pages.

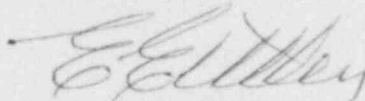
Mr. Eisenhut's letter of July 2, 1980 also requested that the Operating Licenses for the Brunswick Units be amended to include license conditions related to a System Integrity Measurements Program and Improved Iodine Measurements capability. The requested proposed license conditions are attached. As before, changes are indicated by vertical bars in the right-hand margin.

Although CP&L has provided the requested revisions to the Brunswick Operating Licenses and Technical Specifications, we believe that the NRC needs to recognize the prototypical state of some of the Lessons Learned items. In

many cases, sufficient operating experience has not been accrued or time elapsed to develop adequate spare part supply chains or maintenance procedures to maintain the equipment at the required reliability. This is especially true at Brunswick in the area of Safety-Relief Valve position indications but will also apply to several Category "B" items. We feel that in the cases of prototypical equipment a minimum of one year's operating experience should be allowed prior to the formal imposition of Technical Specifications, and that the Technical Specifications should only be imposed after consulting with the licensee as to the status of operating experience, spare parts, and technical information on the equipment. In return the licensee should be pledged to a best effort approach from the time of installation of the equipment to obtain the required spare parts and technical information. We would welcome further discussion with you on this subject.

If you have any questions regarding this request, please contact my staff.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

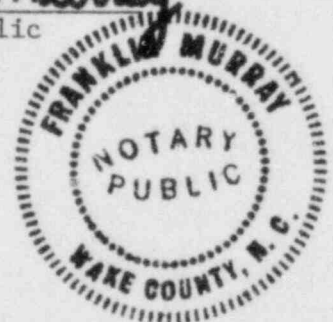
JJS/dk
Attachments

cc: J. P. O'Reilly (NRC-RII)

Sworn to and subscribed before me this 16th day of September, 1980

Franklin Murray
Notary Public

My Commission expires: October 4, 1981



IMPOSED LICENSE CONDITIONS FOR
OPERATING LICENSE NO. DPR-71

2.I. Systems Integrity

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

2.J. Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

PROPOSED LICENSE CONDITIONS FOR
OPERATING LICENSE NO. DPR-62

2.F. Systems Integrity

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

2.G. Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.