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November 5, 1980

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SERIAL NO.: NO-80-1649

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
SURVEILLANCE REQUIREMENTS

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 for its Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2. These changes will provide slight extensions of the end-dates for performing several inspections, surveillances, and tests, that are required in technical specifications.

Completion of each of these items requires that Brunswick Unit 1 be shut down. Two of the items are due in late December, 1980; one is due on January 31, 1981; and the remainder are due in February, 1981. The attached technical specification changes have been prepared to reflect that these items would be completed during a Brunswick Unit 1 outage that CP&L has scheduled in March, 1981. These "one-time" extensions are being requested due to the extended outages of both Brunswick units during the spring and summer, 1980 and the resulting cancellation of the "maintenance" outage on Brunswick Unit 1 scheduled for September, 1980. Therefore, since the technical specification items were not performed as originally planned in September, 1980, CP&L has determined that the optimum alternative is to complete all of this work during a single scheduled Unit 1 outage in March, 1981. However, we also plan to do as much of this work as possible during earlier unscheduled outages if that opportunity occurs.

CP&L has performed safety analyses for the requested deferrals and has determined that there is no impact on (1) the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR; (2) the possibility of creation of an accident or malfunction of a different type than any previously evaluated in the FSAR; and (3) the margin of safety as defined in the basis for technical specifications.

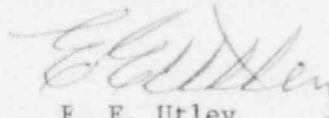
All but two of the items are on 18-month intervals and have a sustained record of satisfactory performance during the initial testing at the end of their previous intervals. The extensions requested for these items range from two to five weeks which is between 3% and 7% of the original interval. The two remaining changes are the functional and visual tests for inaccessible snubbers. The snubber functional test is on an 18-month interval and is due on December 30, 1980; only one inoperable snubber was found during the last inspection. The snubber visual test is on a 6-month interval and is due on December 28, 1980; the most recent inspection found one inoperable snubber, the inspection before that found three inoperable, and the inspection before that found four inoperable. Since the intervals are being increased and the number of inoperable snubbers is decreasing, the requested deferral is not unreasonable.

The small delays in performing these tests do not affect the capability of the associated systems. The successful history of previous tests and of ongoing similar tests provides assurance that the probability of failure will not increase. The delays will therefore not affect the safe performance of these systems.

Attached you will find the revised technical specifications pages with the changes indicated by vertical lines in the right-hand margins. We believe that these requests are administrative in nature and thus constitute two Class II amendments in accordance with 10CFR170.22. Accordingly, our check for \$2400 is enclosed.

Should you have any questions regarding this matter, please contact my staff.

Yours very truly,

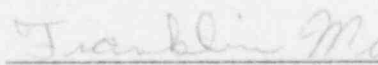


F. E. Utley

Executive Vice President
Power Supply and
Engineering & Construction

JAM/jc (100-010)
Attachments

Sworn to and subscribed before me this 5th day of November 1980


Notary Public

My Commission expires: October 4, 1981

