

December 30, 1980

FILE: NG-3514(B)

SERIAL: NO-80-1924

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT UNIT NOS. 1 & 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
CONTROL ROOM HABITABILITY REQUIREMENTS

Dear Mr. Eisenhut:

In accordance with the requirements of Item III.D.3.4, Control Room Habitability Requirements, as described in your letter of May 7, 1980, and the clarifications and schedule contained in NUREG-0737, Carolina Power & Light Company (CP&L) hereby submits for your review a report entitled "Control Room Habitability Evaluation, Brunswick Steam Electric Generating Plant". This report, prepared under contract by NUS Corporation for CP&L, responds to all of the information requested in the above-referenced NRC documents. The information in the report is presently undergoing a quality check; however, we do not expect the results and conclusions to change as a consequence of that verification. Any significant changes will be promptly brought to your attention.

In the course of our evaluation, a deficiency was found in the Technical Specification surveillance requirements. This deficiency was subsequently reported and remedied per Licensee Event Report (LER) No. 2-80-110. In addition, five minor concerns with and possible areas of improvement in the existing system were identified for possible further action. These are described in Section 4.3 of the report. CP&L has initiated the necessary actions to address each of these items as follows:

- Concern 4.3.a - One door of the mechanical equipment room was found ajar and one was found off its hinges.
  - Position - CP&L commits to repair or replace and then rehang the door that was found off its hinges.
- Concern 4.3.b - Because the cable access ways potentially communicate with the outside, these areas may not be suitable for storage of emergency food supplies or breathing gear.

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- Position - CP&L commits to store emergency food, breathing gear, and other emergency supplies in another area more suitable for storage or to seal the cable access ways so that they are separated from the outside environs.
- Concern 4.3.c - Ducting in the emergency filter system was found to have been poorly maintained.
- Position - CP&L commits to inspect the system and resolve all discrepancies.
- Concern 4.3.d - Two unsealed penetrations were found in the control building floor. One was located in the Unit 2 cable access way and consisted of an open, 2-inch diameter pipe. The other was located in the washroom and consisted of an annular gap between a 4-inch diameter cutout and a 2-inch diameter pipe passing through the cutout. This condition will be checked against fire protection requirements.
- Position - CP&L commits to sealing the penetration in the washroom. The penetration in the cable access way will also be sealed if it is determined in concern 4.3.b that the cable access ways will be used for the storage of emergency supplies.
- Concern 4.3.e - Several Engineering Work Requests pertaining to the control room ventilation system were identified as being unresolved.
- Position - CP&L commits to resolve the engineering work requests in question.

While conducting the review of the habitability of the control room against current NRC requirements, major differences were identified between the existing control room emergency ventilation system and the one currently required. These differences are pointed out in Appendix A, Comparison of the Brunswick Control Room to the Criteria of NRC Standard Review Plans 6.4, 9.4.1, and 6.5.1 and in Appendix B, Additional Information Required By the NRC. Upgrading to fully meet the present criteria would result in major modifications to the control room ventilation system and would seriously impact the operation of the Brunswick plant while modifications were being performed. CP&L is not convinced that such gross changes to the existing system are presently warranted. Furthermore, CP&L believes the Commission should review carefully on a cost/benefit basis the merits of these changes before requirements for modifications are published. Thus, CP&L does not commit to perform any ventilation

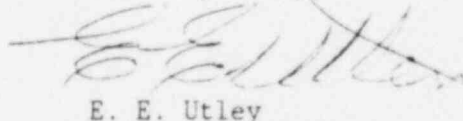
system modifications other than those committed to in the preceding paragraph. Other deficiencies noted in the appendices, related to the emergency food supply and the provision of potassium iodide for control room occupants, will be acted upon by CP&L.

One item necessary to bound the calculations of toxic chemical concentrations is incomplete as of this date. Toxic chemical shipments on nearby highways and the Intracoastal Waterway have not been quantified, since investigations of shippers to date have proved to be inconclusive. CP&L will investigate this area in more detail to determine if the postulated accidents discussed in Section 6.0 of the report are of real concern. The results of our investigations will be provided to you in a timely manner to aid in your review of our submittal.

The modifications and corrections that CP&L has committed to above will be performed as expeditiously as possible in consonance with other Three Mile Island related requirements and NRC requirements in other areas. A schedule for implementation of each of these commitments has not been developed, but they will be completely implemented prior to the NRC required date of January 1, 1983.

We trust that this information is suitable for your use in resolution of this item.

Yours very truly,



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

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cc: Mr. J. N. Hannon (NRC)