

Carolina Power & Light Company

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United States Nuclear Regulatory Commission ATTENTION: Document Control Desk Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62 BASES CHANGE - EMERGENCY DIESEL GENERATOR SURVEILLANCE

Gentlemen:

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Carolina Power & Light Company hereby proposes a change to the Bases Section for Technical Specification 3/4.8, "Electrical Power Systems." This change consists of a clarification of Surveillance Requirement 4.8.1.1.2.d.1 with respect to the term "during shutdown." The revised Bases pages are included in Attachment 1.

Surveillance Requirement 4.8.1.1.2.d.1 requires that the emergency diesel generators be inspected at least once per 18 months "during shutdown." Brunswick-1 and Brunswick-2 were designed and are operated with a shared configuration of the four emergency diesel generators. This is reflected in Technical Specification 3.8.1.1 which requires that all four emergency diesel generators be operable when one or both units are operating and establishes allowed out of service times for inoperable emergency diesel generators. Given this Limiting Condition for Operation, inspection of any of the four emergency diesel generators could be interpreted as requiring shutdown of both units.

The proposed change to Bases Section 3/4.8 clarifies that "during shutdown" means the shutdown of Brunswick-1 for inspection of emergency diesel generators 1 and 2; and the shutdown of Brunswick-2 for the inspection of emergency diesel generators 3 and 4. This definition is consistent with the normal configuration of the electrical distribution system. Emergency diesel generators 1, 2, 3, and 4 supply emergency buses E1, E2, E3, and E4 respectively. Emergency buses E1 and E2 are associated with Brunswick-1 and E3 and E4 with Brunswick-2. The emergency buses for such unit are capable of being cross-tied between units (same division) or within the unit (different divisions). In addition, selected redundant loads, such as two residual heat removal pump and two service water pump are normally supplied by the opposite unit's emergency buses.

While performing the required inspection of a given emergency diesel generator, the loads associated with that emergency diesel generator are subject to their Limiting Condition for Operation requirements. Thus, if a Brunswick-1 emergency diesel generator is removed from service, the applicable action statements for both Brunswick-1 and Brunswick-2 are implemented due to

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inoperability of the emergency power source to the emergency bus. This is the same action that would be required if the emergency diesel generator was inoperable while both units are operating.

Please refer any questions regarding this submittal to Mr. M. R. Oates at (919) 546-6063.

Yours very truly,

Leonard I. Loflin Manager Nuclear Licensing Section

LIL/MAT

Enclosure

cc: Mr. S. D. Ebneter Mr. W. H. Ruland Mr. E. G. Tourigny

ATTACHMENT 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 NRC DOCKETS 50-325 & 50-324 OPERATING LICENSES DPR-71 & DPR-62 BASES CHANGE - EMERGENCY DIESEL GENERATOR SURVEILLANCE

BASES PAGES - UNITS 1 AND 2