

Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

MAR 15 1990

A. B. CUTTER

Vice President

Nuclear Services Department

SERIAL: NLS-90-042
10CFR50.90
90TSB05

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
REQUEST FOR LICENSE AMENDMENT
TURBINE CONTROL VALVES AND FIRE DETECTORS
(TECHNICAL SPECIFICATION INTERPRETATIONS 84-19 AND 85-10)

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2. The proposed changes (1) revise Technical Specification 3.3.1, Table 3.3.1-1, Item 10 for Unit 2 only to indicate two channels per trip system, and (2) revise Technical Specification 3.3.5.7, Table 3.3.5.7-1, Item 5 for both Unit 1 and Unit 2 to correctly indicate the minimum number and types of fire detectors required operable. As committed to in CP&L letter dated February 2, 1990, the proposed amendment will resolve Technical Specification Interpretations 84-19 and 85-10.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides the proposed Technical Specification pages for Unit 1.

Enclosure 4 provides the proposed Technical Specification pages for Unit 2.

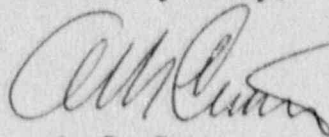
In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendments, once approved by the NRC, be issued with an effective date to be no later than 60 days from the issuance of the amendment.

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

Yours very truly,



A. B. Cutter

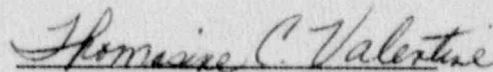
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Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Technical Specification Pages - Unit 1
4. Technical Specification Pages - Unit 2

cc: Mr. Dayne H. Brown
Mr. S. D. Ebnetter
Mr. N.B. Le
Mr. W. H. Ruland

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires: 1-31-95



ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
TURBINE CONTROL VALVES AND FIRE DETECTORS
(TECHNICAL SPECIFICATION INTERPRETATIONS 84-19 AND 85-10)

BASIS FOR CHANGE REQUEST

Proposed Change 1

Currently, Unit 2 Technical Specification 3.3.1, Table 3.3.1-1, Item 10 (Turbine Control Valve Fast Closure) requires a minimum of four (4) operable channels per trip system; however, the Brunswick design has only two (2) channels per trip system. The proposed change revises the subject reference to correctly indicate two (2) channels per trip system.

Basis

The proposed change is a purely administrative change to correct a previously inserted error. When Brunswick Unit 2 was initially licensed to operate with Custom Technical Specifications, the requirement for the minimum number of channels for the Turbine Control Valve Fast Closure was two channels per trip system (Custom Technical Specifications Table 3.1-1, Item 12). When Brunswick Unit 1 was licensed to Standard Technical Specifications and Unit 2 switched to Standard Technical Specifications (1976), the requirement for this function was again two channels per trip system.

In the early 1980's, Brunswick began an upgrade of selected instrumentation to new Rosemount analog equipment. On January 26, 1983, to support this upgrade and to reflect applicable changes in instrument tag numbers, a request for a Technical Specification amendment was submitted to the Nuclear Regulatory Commission (NRC). During the development of the affected Table 3.3.1-1 page for submittal, a "4" was incorrectly inserted, instead of a "2", for the subject function. (Note: The Unit 1 Technical Specification reflects the correct number of channels - 2.) The change request affecting that page was for other instrumentation and was not intended to affect the Turbine Control Valve Fast Closure, as this equipment was not upgraded to the analog system. Neither the Company's safety analysis nor the actual page (this item was not "barred" to indicate a change) identified the change as requested.

On June 7, 1984, the submitted change request was issued by the NRC via Brunswick Unit 2 Technical Specification Amendment 97. Again, neither the safety evaluation nor the actual page (not "barred") identified the number of channels required for Turbine Control Valve Fast Closure as a requested change. To allow Brunswick Unit 2 to operate within its design (2 channels per system) Brunswick issued Technical Specification Interpretation 84-19 on October 29, 1984. The purpose of this amendment request is to correct the

Technical Specifications and allow closure of the Technical Specification Interpretation.

Proposed Change 2

Currently, Brunswick Unit 1 and Unit 2 Technical Specifications 3.3.5.7, Table 3.3.5.7-1, Item 5 requires Zone 4 of the AOG (Augmented Off-Gas) Building to have a minimum of one flame detector, six heat detectors, and six smoke detectors operable. The minimum number of fire detectors required operable should be two flame detectors, five heat detectors, and zero smoke detectors. The proposed change revises the subject reference to correctly indicate these minimum requirements.

Basis

In the early 1980's, to improve fire detection and response, numerous fire detection instruments were installed, removed, or revised (changed type) in the fire zones listed in Technical Specification Table 3.3.5.7-1, and selected fire zones encompassed by Technical Specifications were redefined. When the design change was being initiated, it was recognized that a change to the Technical Specifications would be required, and an appropriate change request was submitted to the NRC on September 7, 1982. Part of that change request was to revise the minimum number of fire detectors required operable to two flame detectors, five heat detectors, and zero smoke detectors.

While the above referenced change request was being reviewed by the NRC, subsequent change requests were submitted (December 13, 1982, and October 17, 1983) which affected Table 3.3.5.7-1, but did not change the previous AOG Building Zone 4 request. However, the later submittals incorrectly reflected the "old" numbers for Zone 4 of the AOG Building, and did not reference the outstanding request. On March 6, 1984, the NRC issued the amendments to update Table 3.3.5.7-1 [Amendments 66 (Unit 1) and 92 (Unit 2)]. However, while the associated NRC Safety Evaluation Report clearly references CF&L's September 7, 1982 submittal, the amendments did not incorporate the changes reviewed for Zone 4 of the AOG Building. To establish correct minimum operable fire detector requirements for Brunswick to operate within its installed design (three flame, seven heat, and zero smoke detectors), Brunswick issued Technical Specification Interpretation 85-10. The purpose of this change request is to correct the Technical Specifications and allow closure of the Technical Specification Interpretation.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
TURBINE CONTROL VALVES AND FIRE DETECTORS
(TECHNICAL SPECIFICATION INTERPRETATIONS 84-19 AND 85-10)

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change 1

Currently, Unit 2 Technical Specification 3.3.1, Table 3.3.1-1, Item 10 (Turbine Control Valve Fast Closure) requires a minimum of four (4) operable channels per trip system; however, the Brunswick design has only two (2) channels per trip system. The proposed change revises the subject reference to correctly indicate two (2) channels per trip system.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment is purely administrative in nature. It does not modify or change the function or design of any installed equipment, and no modification or change to installed equipment or operating procedures is involved. Its sole purpose is to correct a previously inserted error. Therefore, the proposed amendment cannot involve a significant increase in the probability or consequences of any previously evaluated accident.
2. The proposed amendment does not change the design or function of any installed equipment and has no impact on any accident analyses. The change is being made to correct a typographical error and can clearly be classified as administrative. Therefore, the proposed amendment cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not impact any safety analyses because it is purely administrative in nature. No modification or change to installed equipment or operating procedures is involved. Therefore, the proposed amendment does not involve a significant reduction in the margin of safety.

Proposed Change 2

Currently, Brunswick Unit 1 and Unit 2 Technical Specifications 3.3.5.7, Table 3.3.5.7-1, Item 5 requires Zone 4 of the AOG (Augmented Off-Gas) Building to have a minimum of one flame detector, six heat detectors, and six smoke detectors operable. The minimum number of fire detectors required operable should be two flame detectors, five heat detectors, and zero smoke detectors. The proposed change revises the subject reference to correctly indicate the installed design.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. In the early 1980's, to improve fire detection and response, numerous fire detection instruments were installed, removed, or revised (changed type) in the fire zones listed in Technical Specification Table 3.3.5.7-1, and selected fire zones encompassed by the Technical Specifications were redefined. Appropriate Technical Specification change requests were submitted, and the NRC subsequently issued Amendments 66 (Unit 1) and 92 (Unit 2) which included an updated Table 3.3.5.7-1. However, due to a processing error, one of the reviewed and approved changes was inadvertently not incorporated on the amended Table 3.3.5.7-1. The sole purpose of this change is to correct this omission. Further, this change does not affect the function or design of any installed equipment. Therefore, the proposed change is purely administrative in nature and cannot increase the probability or consequences of any previously evaluated accident.
2. As described above, the proposed change is purely administrative. It does not change the design or function of any installed equipment and has no impact on plant operations or on any accident analyses. The change is being made solely to correct the omission of a previously reviewed and approved change. Therefore, the proposed change cannot create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed amendment does not impact any safety analyses because it is purely administrative in nature. No modification or change to installed equipment is involved. Therefore, the proposed amendment does not involve a significant reduction in the margin of safety.