

November 2, 1981

Docket Nos. 50-325
50-324



Mr. J. A. Jones
Senior Executive Vice President
Carolina Power & Light Company
336 Fayetteville Street
Raleigh, North Carolina 27602

Dear Mr. Jones:

RE: IMPLEMENTATION OF UNRESOLVED SAFETY ISSUE A-10, BWR NOZZLE CRACKING
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2

By letter dated October 7, 1981 you provided the information requested in our letter dated June 11, 1981 regarding the above subject at Brunswick Steam Electric Plant, Unit Nos. 1 and 2. Specifically, you provided information regarding:

1. Reroute of the reactor water cleanup (RWCU) system to each feedwater line;
2. Modification of the feedwater system low flow controller;
3. Modifications to the control rod drive (CRD) hydraulic system; and
4. Commitment to follow the inservice inspection schedule of Table 2 of NUREG-0619.

With regard to your statements concerning items 1 and 2 above, it is our understanding that the rerouting of the RWCU, with the resultant increase in heat supplied to the feedwater system, and the modification of the low flow controller, to provide a constant feedwater flow even at low power levels, should be complementary, rather than independent, solutions. We also understand that plant-specific differences in startup and turbine-warmup procedures may result in the need for large amounts of feedwater flow or substantial RWCU discharge during the early stages of startup. Either of these requirements may obviate the benefits of RWCU rerouting. We request that, should you determine from your evaluation that the beneficial aspects of RWCU rerouting are obviated, the detailed bases of your evaluation and conclusion be included in the post-modification reports required by NUREG-0619.

With regard to item 3 above, we understand from your statements that it is your intent to cut and cap the CRD return line without rerouting. Should this not be the case, please inform us. Also, although Section 8.1(4) of NUREG-0619 specifically requests installation of flush ports at high and low

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points of the normal drive movement exhaust water header piping run if carbon steel piping is retained, you did not address this in your October 7, 1981 letter. Please provide a commitment to comply, or the basis for not installing the flush ports, within 30 days of receipt of this letter.

Finally, with regard to item 4 above, we cannot agree at this time with your assessment that dye-penetrant (PT) inspection of only the accessible portions of the nozzle blend radius on Unit No. 2 will be acceptable. As stated in NUREG-0619, and as noted in your letter, ultrasonic testing techniques are not advanced to the point of being the sole means of inspection. There is not enough field experience with the new spargers/thermal sleeves to allow any waiver of the inspection intervals or techniques given in NUREG-0619. You will note that: (1) Unit No. 2 will require no PT inspection for 9 refueling cycles or 135 startup/shutdown cycles (whichever comes sooner) and (2) NUREG-0619 specifically encourages the industry to develop advanced techniques such that reliance on PT inspections will no longer be necessary. It is our hope, as it is yours, that such advances will occur prior to the need for the first sparger/thermal sleeve removal and PT inspection at Unit No. 2. Until such field experience and inspection techniques are available, however, we see no choice but to retain the inspection intervals and techniques, including full nozzle PT inspection, stated in NUREG-0619.

Your letter stated that schedule extension, beyond that suggested in NUREG-0619, will be necessary because of slippage due to operational events. We can accept completion of the required actions by the schedule noted in your letter.

Except for the commitment requested as part of the discussion of item 3 above, no further correspondence is necessary on the subject of A-10 implementation until the submittal of the reports requested by NUREG-0619. Should you have any questions, please do not hesitate to contact your project manager.

Sincerely,

Thomas A. Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing

cc: See next page

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Mr. J. A. Jones

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