



Carolina Power & Light Company

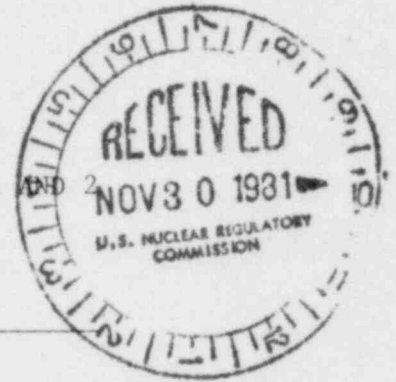
November 25, 1981

File: NG-3514(B)

Serial No.: NO-81-1948

Office of Nuclear Reactor Regulation  
ATTN: 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  
APPENDIX B TECHNICAL SPECIFICATIONS



Dear Mr. Ippolito:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10 Section 50.90 and Section 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Appendix B Technical Specifications for the Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2. The purpose of these changes is to implement a revision to the methodology used for monitoring noble gas releases from the facility.

DISCUSSION

Subsequent to our October 30, 1981 letter to you, telephone conversations were held between our staffs to discuss possible revisions to the Brunswick Appendix B Technical Specifications. Certain additional information requested by NRC during these discussions has been transmitted informally to your staff. This information includes the two-year projected noble gas release rates which were formally requested by your November 10, 1981 letter.

As stated in your November 10, 1981 letter, draft revisions to the Brunswick Appendix B Technical Specifications were developed by NRC Staff and forwarded to CP&L. These revisions include definitive action statements and reflect current NRC methodology based upon Appendix I design objectives. Our staff has reviewed the draft specifications and discussed them with members of your staff. Minor changes resulting from the discussions

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\$4,400*

have been incorporated into the attached package. CP&L is in concurrence with the technical content of the revised specifications and with the methodology used by NRC in their development. CP&L has also revised the appropriate bases pages, which are attached.

CP&L has made one interpretive revision to the Technical Specifications. We have replaced the "12 consecutive month" basis for annual limits with a "calendar year" basis. Several regulatory references support this position. 10CFR50 Appendix I refers to "annual air dose" which should allow a "calendar year" interpretation. In addition, NUREG-0473, Revision 2 "Radiological Effluent Technical Specifications for BWR's" specifically calls for calendar year limits for Appendix I air doses due to noble gases in Section 3.11.2.2.b. Also, Section 5.3.1 of NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants" provides mathematical relationships acceptable to NRC for implementing 10CFR50, Appendix I; all of these relationships are specifically presented using a calendar basis. From our telephone discussions with your staff, we understand that current NRC practice is to request that licensees use the 12 consecutive month format in specifications. However, there is no regulatory basis for this interpretation and certainly no requirement for its implementation. To the contrary, several NRC regulatory documents clearly state that "calendar" intervals are acceptable. CP&L firmly believes that the "calendar year" basis is a valid interpretation of NRC regulations and that it complies with formal guidance issued by NRC. We have therefore prepared the attached Technical Specification changes to incorporate the "calendar year" basis.

#### ADMINISTRATIVE INFORMATION

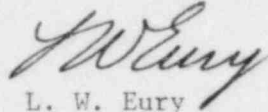
Enclosed you will find the revised Technical Specifications pages with the changes indicated by vertical lines in the margins. In accordance with 10CFR170.22, we have determined that these changes involve a single technical issue and thus constitute one Class I amendment and one Class III amendment. Accordingly, our check for \$4,400.00 is enclosed.

#### SCHEDULE

Based on current and projected noble gas releases, we estimate that Brunswick will reach the existing Appendix B Technical Specification limit by mid to late December, 1981. We request that NRC expedite issuance of these Technical Specification changes as much as possible. We will keep your project manager apprised of the plant status periodically via telephone in the interim.

Please contact my staff should you have any questions or if you require any additional information.

Yours very truly,



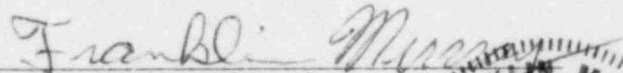
L. W. Eury  
Senior Vice President  
Power Supply

JAM/lr (4312)

Attachments

cc: Messrs. C. A. Julian  
P. C. Lewis  
J. P. O'Reilly  
J. Van Vliet

L. W. Eury, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

  
Notary (Seal)

My commission expires: Oct. 4, 1986

