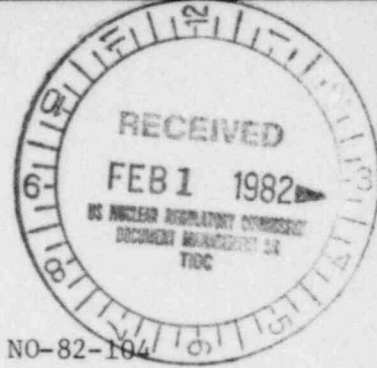




Carolina Power & Light Company

January 18, 1982



File: NG-3514(B)

Serial No.: NO-82-104

Honorable Nunzio J. Palladino
Chairman
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
EXTENSION REQUEST FOR
PETITION OF CAROLINA POWER & LIGHT COMPANY
FOR EXEMPTIONS FROM CERTAIN REQUIREMENTS OF
10CFR50.48 AND APPENDIX R TO 10CFR PART 50

Dear Mr. Palladino:

By letter dated March 6, 1981, Carolina Power & Light Company (CP&L) submitted to the Nuclear Regulatory Commission (NRC or the Commission) CP&L's petition for exemption from certain of the requirements of 10CFR §50.48 and Appendix R to 10CFR Part 50 (sometimes referred to collectively herein as the fire protection rule) with respect to the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP). By letter dated September 14, 1981, CP&L amended its March 6, 1981 petition with respect to certain schedules for submitting information.

In our September 14, 1981 letter, CP&L requested exemptions from §50.48 in the following respects:

- (1) CP&L requested the following extensions of schedule:
 - (a) Extend from September 1, 1981 to January 15, 1982 the date for:
 - (i) Submittal of plans and schedules for any modifications necessary to achieve compliance with Section III.G.2 of Appendix R;
 - (ii) Filing requests for additional exemptions from Section III.G pursuant to §§50.12(a) and 50.48(c)(6).
 - (b) Extend from December 1, 1981 to January 15, 1982 the date for submittal of design descriptions of alternative or dedicated shutdown systems to comply with Section III.G.3, if such are necessary.

A006
3
1/6

8202020353 820118
PDR ADOCK 05000324
F PDR

Box 1551 • Raleigh, N. C. 27602

- (c) Extend from December 1, 1981 to January 15, 1982 the date from which the installation schedules established in §50.48(c)(2) and (3) are calculated.

CP&L hereby requests that the schedules for each of the items set forth in numbered paragraph (1) be extended until June 30, 1982.

These modifications of schedule are necessary to enable CP&L to complete the tasks we must perform in order to comply with the fire protection rule. In our March 6, 1981 petition, CP&L stated that it had initiated studies to determine to what extent our previously completed and approved fire protection modifications meet the requirements of Section III.G; to develop technical justifications to support requests for such exemptions from Section III.G as CP&L believes to be warranted upon the conclusion of its analyses; to determine whether any modifications will be necessary to achieve compliance with Section III.G; to develop all plans and schedules for any modifications necessary to satisfy Section III.G.2; and to prepare and submit design descriptions for an alternative or dedicated shutdown system to satisfy Section III.G.3 if such a system is necessary.

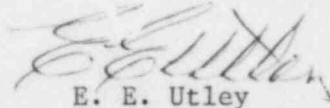
While CP&L and our architect-engineer have made every reasonable effort to meet the schedules proposed by CP&L in our petition and subsequent letter of September 14, 1981, these extensive studies have produced a significant amount of results and recommendations that must now be evaluated for their safety significance. Approximately 12,000 man-hours were expended conducting the fire protection analyses. The results were received from our architect-engineer last week for one Brunswick unit, and should be received for the second unit by January 22, 1982. Prior to implementing design changes, the study results must be evaluated to determine if there are unreviewed safety issues involved or other safety concerns. Because of the extensive scope of the study, a substantial evaluation will be required by CP&L engineering and plant personnel. CP&L believes that it will be able to conclude the studies; develop necessary plans, schedules, and design descriptions; and complete any additional exemption requests which may be appropriate for submittal to NRC prior to June 30, 1982. In light of these necessary scheduler adjustments, June 30, 1982 would be the appropriate date from which to calculate the installation schedules established in §50.48(c)(2) and (3).

In its petition, CP&L pointed out that CP&L has satisfied all of the requirements of Appendix A to BTP 9.5-1 at BSEP and has received a Staff Safety Evaluation Report approving each such item. The fire protection features currently installed at BSEP, therefore, are entirely adequate to protect the health and safety of the public.

As discussed in our March 6 and September 14, 1981 letters, it is clear that the NRC Staff believes that requests for extension of time can be granted without adverse impact to the public health and safety, and that the granting of CP&L's request for this additional extension of

the schedule established in §50.48(c) will in no way adversely affect the health and safety of the public. CP&L, therefore, respectfully requests that the Commission grant the requests for extension set forth herein.

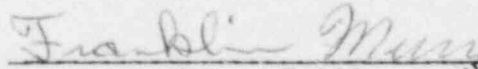
Yours very truly,



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

DLB/lr (1405)

Sworn to and subscribed before me this 18th day of January, 1982.


Notary Public

My commission expires: Oct. 4, 1986

