



Carolina Power & Light Company

AUG 31 1982

Office of Nuclear Reactor Regulation
ATTN: Mr. D. B. Vassallo, 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
REVISION TO TECHNICAL SPECIFICATIONS
ELECTRIC POWER SYSTEMS

Dear Mr. Vassa'lo:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to Technical Specifications (TS) for the Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2. The enclosed changes concern the Limiting Condition for Operation (LCO) time for an inoperable diesel generator, the periodicity diesel generators must be "quick started", and the deletion of Technical Specification 4.8.1.1.1.b.

DISCUSSION

Item 1:

Under current BSEP Standard Technical Specifications, a diesel generator may be out of service for 72 hours before shutdown of both units is required. Under the proposed BSEP Technical Specifications, a diesel generator may be out of service for seven days before shutdown of both units is required.

Custom Technical Specifications, under which the Brunswick Plant was licensed, had allowed operation of both units for seven days with the loss of one diesel generator. The basis for this (Custom TS 3.9) was, "One of the required diesel generators may be allowed out of service based on the availability of power from the startup transformer, and the fact that three diesel generators carry sufficient engineered safety feature equipment to cover all breaks."

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The safety design basis for the standby AC power supply system states the following in Section 8.11.2 of the BSEP FSAR (Section 8.3.1.1.6.1 in the Updated FSAR):

The system is designed so that the failure of any single piece of equipment, including a diesel generator, circuit breaker, distribution center, or interconnecting wiring or cabling will not jeopardize the effectiveness of core standby cooling systems.

Diesel capacity is such that any three of the four diesels provided can supply all required loads for the safe shutdown of one unit and a design basis accident on the other unit without outside power.

Based on the above, the current plant design is capable of safely responding to a design basis accident concurrent with a loss of offsite power with one inoperable diesel generator. Additionally, the probability of an event occurring with one diesel generator inoperable during a seven-day LCO is remote.

Item 2:

Under the current BSEP Technical Specifications, each operable diesel generator must be "quick started" within two hours and once every 12 hours thereafter when one diesel generator is inoperable. Under the proposed BSEP Technical Specifications, each operable diesel generator must be "quick started" within four hours and once every 72 hours thereafter when one diesel generator is inoperable.

Carolina Power & Light Company believes the TS requirement that each operable diesel generator must be "quick started" every 12 hours when one diesel generator is inoperable is overly conservative; it necessitates an excessive number of quick starts which may reduce the long-term serviceability of the diesel generators. The enclosed TS revisions reflect an increased interval for quick start tests which CP&L believes is sufficient to demonstrate diesel generator operability.

Item 3:

Carolina Power & Light Company has reviewed TS 4.8.1.1.1.b, General Design Criterion 17 of 10 CFR 50, Appendix A, and the applicable bases for electrical power systems. We have concluded that TS 4.8.1.1.1.b concerns the offsite transmission network coming into the switchyard. Brunswick Steam Electric Plant Unit Nos. 1 and 2 have four separate, constantly energized transmission lines supplied to each unit. Based on the above, a surveillance

test requirement to switch to a backup power source is inappropriate as the intent of TS 4.8.1.1.1.b is met on a continuous basis. The TS revisions enclosed reflect the deletion of this Surveillance Requirement.

CONCLUSION

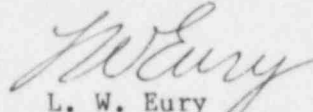
Based on the foregoing discussions, CP&L requests: (1) revision of the TS requirement that an offsite circuit or diesel generator must be returned to operable status within 72 hours; (2) revision of the TS requirement that diesel generators must be "quick started" once per 12 hours with one offsite circuit or one diesel generator inoperable; and (3) deletion of the inappropriate TS Surveillance Requirement to switch from the offsite transmission network to a backup power source to demonstrate power source operability.

ADMINISTRATIVE INFORMATION

Please find enclosed the revised pages for the proposed BSEP Unit Nos. 1 and 2 TS with changes indicated by vertical lines in the right-hand margins. In accordance with 10 CFR 170.12(c), we have determined this request constitutes a Class III and Class I amendment as it involves a single technical issue. Our check for \$4,400 is enclosed as payment of these amendment fees.

Should you have any questions concerning this submittal, please contact our staff.

Yours very truly,



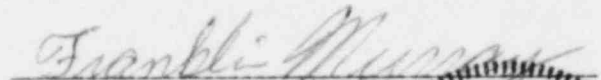
L. W. Eury
Senior Vice President
Power Supply Group

MSG/ce (435C5T5)
Enclosures

cc: Mr. D. O. Myers (NRC-BSEP)
Mr. J. P. O'Reilly (NRC-RII)
Mr. J. A. Van Vliet (NRC)

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.

My commission expires: **OCT 04 1986**


Notary (Seal)

