UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 52 TO FACILITY LICENSE NO. DPR-71 AND

AMENDMENT NO. 77 TO FACILITY LICENSE NO. DPR-62

CAROLINA POWER & LIGHT COMPANY

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2

DOCKET NOS. 50-325 AND 50-324

1.0 Introduction

By letters dated September 25, 1981 and November 18, 1981 Carolina Power & Light Company (the licensee) forwarded proposed changes to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP) Units 1 and 2. By letters dated April 7, 1982 and October 22, 1982 the licensee revised the Technical Specification changes originally proposed by their September 25, 1981 submittal. The proposed changes: institute reporting requirements for challenges to safety valves and relief valves (S/RVs) per NUREG-0737, Item II.K.3.3, and introduce specific, standardized terminology for the reactor vessel water level reference point.

2.0 Evaluation

2.1 S/RV Reporting Requirements

NUREG-0737, Item II.K.3.3 specifies that all S/RV challenges and failures should be reported to the NRC. The Technical Spevification change proposed by the licensee would require all S/RV challenges to be reported monthly. (Reporting of S/RV failures is already required by Section 6.9.1.9 of the BSEP Technical Specifications.)

Since the proposed Technical Specification change conforms to the guidance of NUREG-0737, Item II.K.3.3., we find it to be acceptable.

2.2 Reactor Vessel Water Level Reference Point

NUREG-0737, Item II.K.3.27, Common Reference Level, requested licensees of all operating boiling water reactors to establish a common reference level to which all reactor vessel water level indicators would be zeroed. This was accomplished by license amendment No. 38 for BSEP Unit 1, and by license amendment nos. 56 and 60 for BSEP Unit 2. The safety evaluations accompanying those license amendments specify that the reference level is 367 inches above the vessel bottom, but the Technical Specifications refer to the reference level only as "top fuel guide." Since the top fuel guide is actually eight inches thick (the 367 inch level being about the mid-point on the top fuel guide) the licensee feels that the words "top fuel guide" are ambiguous and could be subject to misinterpretation. Consequently, the licensee has proposed to: (1) introduce a "Reference level zero" which would

be defined in the Technical Specifications as an arbitrary point 367 inches above the vessel zero point; and (2) address all Technical Specification reactor vessel water level setpoints as "+" or "-" inches from Reference Level Zero.

We have verified that: (1) the Reference Level Zero is the same point (i.e. 367 inches above the vessel zero) that was evaluated in the safety evaluations mentioned in the preceding paragraph; (2) no changes are being proposed to the reactor vessel water level setpoints in the Technical Specifications; and (3) no hardware modifications are involved. We consider the proposal to clearly define Reference Level Zero in the Technical Specifications to be potentially beneficial in that the action can only serve to reduce the potential for misinterpretation. We, therefore, consider the proposed Technical Specification changes to be acceptable.

3.0 Environmental Consideration

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR §51.5(d)(4) that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of the amendments.

4.0 Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated, do not create the possibility of an accident of a type different from any evaluated previously, and do not involve a significant reduction in a margin of safety, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: December 16, 1982

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