

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 1
PROPOSED OPERATING LICENSE CONDITION

Operating License Paragraph 2.C.(2)(a)

- (a) Effective February 1, 1983, the surveillance requirement listed below need not be completed until 48 hours after the suppression chamber is restored to operable status (scheduled for April 14, 1983) during the current refueling outage (Reload 3). Upon accomplishment of the surveillance, the provisions of Technical Specification 4.0.2 shall apply.

Specification 4.5.3.1.c.1

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT CORE SPRAY SYSTEM SURVEILLANCE EXTENSION REQUEST DISCUSSION

Technical Specification (TS) 4.5.3.1.c.1 requires that at least once per 92 days, the core spray system (CSS) have a flow test conducted to verify that each CSS pump develops a minimum flow of 4625 gpm on recirculation flow against a system pressure of at least 113 psig. Thus, this surveillance specifies that the CSS pumps must take suction from the suppression chamber and discharge flow back to the suppression chamber. For the CSS to be considered operable per TS's, the above surveillance must be performed as stated and within the surveillance interval in the TS (i.e., 92 days plus the 25 percent extension of the surveillance interval permitted by TS 4.0.2.a). Therefore, the maximum length interval allowed by the TS for the above surveillance is 115 days.

During the Brunswick-1 refueling outage that began December 11, 1982, Mark I torus (suppression chamber) modifications are being installed which have necessitated the draining of the suppression chamber (which occurred on day 2 of the outage). Due to this work, surveillance pursuant to TS 4.5.3.1.c.1 cannot be performed. Surveillance pursuant to TS 4.5.3.1.c.1 was last performed on December 9, 1982 (A loop) and December 10, 1982 (B loop), which corresponds to day minus 1 and day 0, respectively, of the outage.

Normally, in the refueling condition (OPERATIONAL CONDITION 5), the CSS is not required to be operable (and thus to have surveillance testing performed) if all of the following conditions are met: (1) the reactor vessel head is removed, (2) the refueling cavity is flooded, and (3) the spent fuel pool gates are removed. Plant outage work requirements necessitate the draining of the refueling cavity during week 14 (day 99) of the outage, thus requiring that the CSS be operable. In addition, prior to the refueling cavity draining during week 14 of outage, a plant modification will be performed which will relocate a vent valve in one subsystem (B loop) of the CSS. This modification should take approximately one week and is expected to be completed by February 15, 1983. The modification involves the relocation of a vent valve on a 3/4-inch line which comes off the 10-inch CSS line and, therefore, does not involve cutting into the main core spray subsystem line. The suppression chamber, is not scheduled to be refilled until week 18 (day 125) of the outage. Since surveillance pursuant to TS 4.5.3.1.c.1 cannot be accomplished until the suppression chamber is refilled, the CSS would have to be declared inoperable per TS at the end of the current surveillance interval (115 days) unless a "one-time" extension of the surveillance interval is granted. We believe that this "one-time" extension is an acceptable approach based on the following:

- The CSS will be available for operation, if needed, during the relatively short interval when operability is required due to plant conditions (i.e., draining the refueling cavity during week 14 of the outage until refilling of the suppression chamber).

- The CSS consists of two independent subsystems, each with a 100% capacity, thus providing redundant safety system subsystems.
- One subsystem of the CSS will remain unaffected by the vent valve relocation modification.
- Redundant systems that would be available to supply core reflood capability include the condensate system and the service water injection system, with a small volume available from the control rod drive system.
- Surveillance is being performed every 12 hours to verify that the CSS has an operable water source (TS 4.5.3.1.a).
- Surveillance is being performed every 31 days to verify that the CSS is filled with water (TS 4.5.3.1.b.1).
- Surveillance is being performed every 31 days to verify that all valves in the CSS flow path are properly aligned (TS 4.5.3.1.b.2).
- Surveillance is being performed every 92 days to verify the operability of the core spray header differential pressure instrumentation (TS 4.5.3.1.c.2).
- A review of previous CSS operability testing shows that the system is extremely reliable, as no failures have been identified since 1978.