



Carolina Power & Light Company
SEP 29 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
REQUEST FOR LICENSE AMENDMENT
SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES

Dear Mr. Vassallo:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications (TS) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The purpose of these revisions is to clarify the requirements for verifying the operability of the scram discharge volume (SDV) vent and drain valves.

DISCUSSION

By a letter dated November 17, 1981, CP&L submitted to the Commission proposed revisions to the TS for Brunswick to reflect operability testing on the SDV vent and drain valves. The revisions were approved by the Commission and incorporated in the Brunswick TS by Amendments 48 and 72 (dated August 5, 1982) for Unit 1 and Unit 2, respectively. Upon receipt of Amendments 48 and 72, a pre-implementation review was conducted by the plant staff which determined that Surveillance Requirement 4.1.3.1.3, as stated, cannot be performed. Surveillance Requirement 4.1.3.1.3 states that the SDV vent and drain valves shall be demonstrated operable by testing performed in conjunction with Surveillance Requirement 4.1.3.2. Surveillance Requirement 4.1.3.2 verifies the maximum scram insertion time for control rods; however, the instrument logic for control rod insertion time testing does not affect the SDV vent and drain valve logic. Tying Surveillance Requirement 4.1.3.1.3 testing of the vent and drain valves to Surveillance Requirement 4.1.3.2 testing for control rod scram insertion times is, therefore, inappropriate.

Enclosed are revised TS pages for BSEP Unit Nos. 1 and 2 which incorporate a requirement for operability testing of the SDV vent and drain valves under Surveillance Requirement 4.1.3.1.3 in conjunction with reactor protection system (RPS) logic testing identified in Surveillance Requirement 4.3.1.2. The RPS logic testing is required to be performed on a

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*Adol
w/beck
\$1,600*

once-per-18-month basis. The proposed TS revisions enclosed are consistent with the guidance in the GE/BWR-4 Standard Technical Specifications which state that closure time and reset function testing of the SDV vent and drain valves are to be performed on an 18-month frequency.

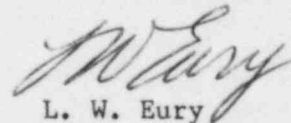
Although Surveillance Requirement 4.1.3.1.3, as stated, cannot be performed, CP&L has performed a periodic test for the SDV vent and drain valves to verify that the valves close in less than 30 seconds upon receipt of a scram signal and that the valves open upon receipt of a scram reset signal. This testing was begun on August 3, 1982 and performed satisfactorily with a maximum valve closure time of less than thirty seconds for the vent and drain valves on both units. Based on discussions with members of the Staff, CP&L believes that the valve closure time and reset function testing performed as part of the periodic test meets the intent of the requirements of Specification 4.1.3.1.3 for demonstrating operability of the SDV vent and drain valves.

ADMINISTRATIVE INFORMATION

You will find enclosed the revised TS pages with the changes indicated by vertical lines in the right-hand margins. We have evaluated this request in accordance with the criteria in 10 CFR 170.22 and have determined that this request involves an administrative issue; therefore, a Class II and a Class I license amendment fee are required for Units 1 and 2 respectively. Our check for \$1,600 is enclosed in payment of these fees.

Should you have any questions concerning this matter, please contact us.

Yours very truly,

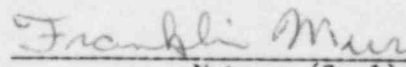


L. W. Eury
Senior Vice President
Power Supply

WRM/mf (4585C6T1)
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.


Notary (Seal)

My commission expires: OCT 04 1986

