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APR 14 1994

Roy A. Anderson
Vice President
Brunswick Nuclear Plant
919 457-2496

SERIAL: BSEP 94-0139
10 CFR 50.90
TSC 94TSB02

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

BRUNSWICK NUCLEAR PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
RELOCATION OF RESPONSE TIME TABLES TO THE UFSAR

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company hereby requests an amendment to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed amendment would relocate the Instrument Response Time Technical Specification Tables to the Updated FSAR, in accordance with Generic Letter 93-08.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides the marked-up Technical Specification pages for Unit 1.

Enclosure 5 provides the marked-up Technical Specification pages for Unit 2.

Enclosure 6 provides a list of regulatory commitments associated with this change.

Typed Technical Specification pages will be submitted at a later date.

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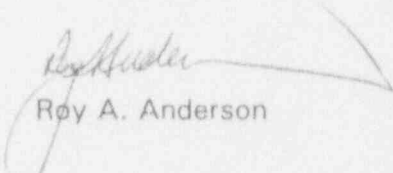
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Carolina Power & Light Company is providing, in accordance with 10 CFR 50.91(b), Mr. Dayne H. Brown of the State of North Carolina with a copy of the proposed license amendments.

To facilitate implementation of these changes at the end of the current refuel outage, CP&L requests that the amendments be issued by June 1, 1994, with an effective date to be no later than 30 days from the issuance of the amendments.

Please refer any questions regarding this submittal to Mr. R. P. Lopriore at (910) 457-2404.

Very truly yours,

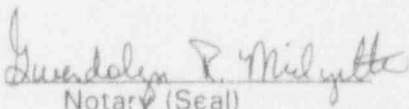

Roy A. Anderson

KAH/

Enclosures:

1. Basis for Change Request
2. No Significant Hazards Evaluation
3. Environmental Considerations
4. Marked-up Technical Specification Pages - Unit 1
5. Marked-up Technical Specification Pages - Unit 2
6. List of Regulatory Commitments

Roy A. Anderson, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires: 8/12/96

cc: Ms. P. D. Anderson
Mr. D. H. Brown
Mr. S. D. Ebnetter, Regional Administrator, Region II
Mr. P. D. Milano, NRR Senior Project Manager - Brunswick Units 1 and 2
Mr. R. L. Prevatte, Brunswick NRC Senior Resident Inspector

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2 NRC DOCKETS 50-325 & 50-324 OPERATING LICENSES DPR-71 & DPR-62 REQUEST FOR LICENSE AMENDMENT RESPONSE TIME TABLE RELOCATION

BASIS FOR CHANGE REQUEST

Proposed Change

The proposed change would relocate instrument response time tables 3.3.1-2 (Reactor Protection System Instrumentation) (RPS), 3.3.2-3 (Isolation Actuation Instrumentation) (IAI), and 3.3.3-3 (Emergency Core Cooling System Actuation Instrumentation) (ECCS) from the Technical Specifications to the Updated Final Safety Analysis Report (UFSAR). To facilitate this relocation, the Limiting Conditions for Operation (LCOs) for the RPS, IAI, and ECCS instruments will be revised to reflect that the instruments "shall be OPERABLE" in lieu of the existing statements that the instruments "shall be OPERABLE with RESPONSE TIMES as shown in Table XX." In addition, reference to the response time tables in the instrumentation Surveillance Requirements section will be deleted.

Basis For Proposed Change

Generic Letter (GL) 93-08, Relocation of Technical Specification (TS) Tables of Instrument Response Time Limits, was published December 29, 1993. This Generic Letter provides guidance for requesting a license amendment to relocate tables of instrument response time limits from Technical Specifications to the UFSAR.

As stated in GL 93-08, the limiting conditions for operation (LCOs) for the instruments require that these systems be operable with response times specified in the TS tables for each of these systems. The surveillance requirements specify that licensees test these systems and verify that the response time of each function is within its limits. Relocating the response time tables to the UFSAR will not alter these surveillance requirements. The UFSAR will now address the response time limits for the RPS, IAI, and ECCS instruments, including those channels for which the response time limit is indicated as "NA" (not applicable). The UFSAR will also clarify response time limits where footnotes are included in the tables that describe how those limits are applied. This TS change also allows the licensee to administratively control changes to the response time limits instruments in accordance with the provisions of 10 CFR 50.59.

The LCO revision is consistent with that proposed in GL 93-08. In addition, the references in the surveillance requirements to the Technical Specification Response Time Tables are being deleted and, consistent with GL 93-08, the exemption for neutron detectors from response time testing has been added as a footnote to the surveillance requirements for the RPS table.

GL 93-08 states that licensees implementing this change should confirm that the plant procedures for response time testing include acceptance criteria that reflect the RPS, IAI, and ECCS response time limits in the tables being relocated from the TS to the UFSAR. BNP has reviewed the procedures controlling response time testing and has confirmed that the procedures do reflect the times identified in the TS tables being relocated to the UFSAR.

GL 93-08 also states that licensees should provide a commitment to include the instrumentation response time limits in the next update of the UFSAR. The upcoming amendment of the Brunswick UFSAR (Amendment 12) is in publication at this time; therefore, CP&L will incorporate the RPS, IAI, and ECCS response time limits tables in the following UFSAR amendment (Amendment 13).

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2 NRC DOCKETS 50-325 & 50-324 OPERATING LICENSES DPR-71 & DPR-62 REQUEST FOR LICENSE AMENDMENT RESPONSE TIME TABLE RELOCATION

NO SIGNIFICANT HAZARDS EVALUATION

In accordance with 10 CFR 50.91(a), Carolina Power & Light Company is providing an analysis of no significant hazards consideration for this issue, using the standards in 10 CFR 50.92. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and believes that its adoption would not involve a significant hazards consideration. The basis for this determination follows.

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. Relocating the instrument response time tables to the Updated FSAR is an administrative change which in no way affects the design or operation of equipment that could initiate or mitigate any accident previously evaluated.
2. The proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. This amendment involves administratively relocating the response time testing tables to the Updated FSAR. The amendment would not affect the operation or design of any plant equipment; therefore, no new credible accidents are created. In addition, the proposed amendment would not affect the capability of the response systems to mitigate the consequences of any accident previously evaluated; therefore, no new or different accident would result from this change.
3. The proposed amendment does not involve a significant reduction in a margin of safety. The amendment would allow licensees to administratively control changes to response time limits for the involved instrumentation under the provisions of 10 CFR 50.59 and the administrative controls that exist in Section 6 of the Technical Specifications. No safety limits are affected by this change. Therefore, this amendment would not result in a reduction in any margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
RESPONSE TIME TABLE RELOCATION

ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and believes that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(c), no environmental impact statement of environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows.

1. This amendment does not involve a significant hazards consideration, as shown in Enclosure 2.
2. This amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The amendment is an administrative relocation of Technical Specification tables to the Updated FSAR, where the existing controls are adequate to ensure that future changes to these tables are appropriately evaluated. Therefore, no negative impact on any systems which could affect the types or amounts of effluents released would occur.
3. This amendment does not result in an increase in individual or cumulative occupational radiation exposure. The amendment involves an administrative relocation of response time instrumentation tables to the Updated FSAR. No changes in radiation levels or exposure times will result from this change. Therefore, no increases in individual or cumulative occupational radiation exposure would result from this amendment.