



Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

G. E. VAUGHN
Vice President
Nuclear Services Department

JAN 04 1991

SERIAL: NLS-90-237
10 CFR 50.90
TSC 87TSB04

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT - FIRE PROTECTION TECHNICAL
SPECIFICATIONS AND LICENSE CONDITION

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) requests a revision to the Operating Licenses and Technical Specifications for the Brunswick Steam Electric Plant, Units 1 & 2. (BSEP 1 & 2).

The proposed change would replace the current license condition regarding fire protection with a standard condition and delete the Technical Specifications that will become unnecessary. The proposed change is consistent with the guidance and provisions of Generic Letters 86-10 and 88-12.

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

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

Enclosure 3 and 4 provide the proposed pages of the license condition and Technical Specifications for each unit.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendments, once approved, be issued with an effective date to be no later than 60 days from the issuance of the amendment.

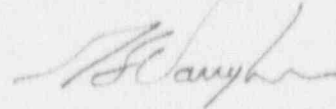
9101110204 910104
PDR ADOCK 05000324
P PDR

1/1
A006

SERIAL: NLS-90-237
10 CFR 50.90
TSC 87TSB04

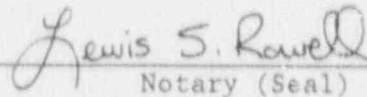
Please refer any questions regarding this submittal to Mr. M. R. Oates at
(919) 546-6063.

Yours very truly,



G. E. Vaughn

G. E. Vaughn, 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, contractors, and agents of Carolina Power & Light Company.

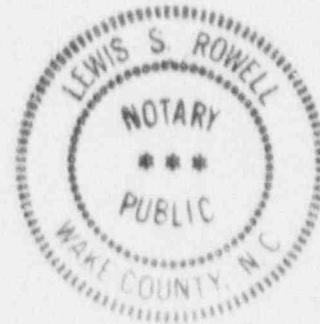

Notary (Seal)

My commission expires: 7/12/94

DBB/cwh (890BNP)

Enclosures

cc: Mr. Dayne Brown
Mr. S. D. Ebnetter
Mr. N. B. Le
Mr. R. L. Prevatte



ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
FIRE PROTECTION TECHNICAL SPECIFICATIONS & LICENSE CONDITION

DISCUSSION AND BASIS FOR CHANGE REQUEST

The NRC issued Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements" on April 24, 1986, which described problems associated with inclusion of the fire protection program in the Technical Specifications (TS). It stated that the Commission believes that the best way to resolve these problems is to incorporate the fire protection program and major commitments, including the fire hazards analysis, by reference, into the Final Safety Analysis Report (FSAR). In this manner, the fire protection program, including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection would be on a consistent status with other plant features described in the FSAR. Also, the provisions of 10 CFR 50.59 would then apply directly for changes made to the fire protection program that would not adversely affect the ability to achieve and maintain safe shutdown.

The generic letter also stated that the Commission believes that a standard license condition, requiring the licensee to comply with the provisions of the fire protection program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. Once the program is incorporated into the FSAR, "the licensee may apply for an amendment to the operating license which amends any current license conditions regarding fire protection..." and substitute a standard condition as described in GL 86-10. At the same time, the licensee may request an amendment to delete the TS that will now be unnecessary.

The fire protection program was incorporated in the Updated FSAR at BSEP via the Annual Update submitted on June 1, 1987. The Fire Hazards Analysis is being restructured to be consistent with the Safe Shutdown Analysis. The FSAR will be revised to reflect these changes in the next update scheduled to be submitted in June 1991.

The following proposed changes are consistent with the changes identified in GL 88-12. Administrative controls to support the Fire Protection Program adequately exist in the TS.

Proposed Change No. 1:

Replace the existing license condition 2.B(6) for BSEP 1 & 2 with the standard license condition in Generic Letter 86-10.

Proposed Change No. 2:

Delete Unit 1 & 2 Fire Protection Technical Specifications 3/4.3.5.7, 3/4.7.7.1, 3/4.7.7.2, 3/4.7.7.3, 3/4.7.7.4, 3/4.7.7.5, 3/4.7.8 and associated bases.

Proposed Change No. 3:

Delete Unit 1 & 2 minimum Fire Brigade staffing requirement in Technical Specification 6.2.2g.

Proposed Change No. 4:

Delete Unit 1 & 2 Special Report requirements in Technical Specifications 6.9.2 d, g, and h.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
FIRE PROTECTION TECHNICAL SPECIFICATIONS & LICENSE CONDITION

10CFR50.92 EVALUATION

The Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazards consideration exists. 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 determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change No. 1:

Replace the existing license condition 2.B(6) with the standard license condition in Generic Letter 86-10.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The existing license condition requires that the licensee comply with the provisions of the November 22, 1977 Fire Protection Safety Evaluation Report and supplements thereto. The new license condition will require all provisions of the fire protection program to be maintained in effect, and that changes to the program may be made in accordance with the provisions of 10 CFR 50.59. The overall objective of the Fire Protection Program and License Conditions is to ensure safe shutdown of the plant in the event of a fire. The provisions of 10 CFR 50.59 preserve the ability to achieve and maintain safe shutdown of the plant. Therefore, the new license condition is consistent with the objective of the existing license condition and Generic Letter 86-10. Consequently this change will not increase the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The new license condition will ensure that the ability to achieve and maintain safe shutdown in the event of a fire is preserved. Since this new license condition is consistent with the objective of the old license condition, this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed amendment does not involve a significant reduction in the margin of safety. The requirements contained in the existing license condition 2.B(6) are also contained in a "Commitment Document" incorporated by reference into the FSAR. Removal of the existing license condition provides consistency with Generic Letter 86-10. The fire protection program, which documents compliance to 10 CFR 50, Appendix R in accordance with the requirements of 10 CFR 50.48 has been incorporated into the updated FSAR by letter dated June 1, 1987. As discussed in Item 1 above, the new license condition is consistent with the intent of the existing license condition. Accordingly, this proposed change will not involve a reduction in the margin of safety.

Proposed Change No. 2:

Delete Unit 1 & 2 Fire Protection Technical Specifications 3/4.3.5.7, 3/4.7.7.1, 3/4.7.7.2, 3/4.7.7.3, 3/4.7.7.4, 3/4.7.7.5, 3/4.7.8 and associated bases.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. This is because the operability requirements of the fire protection features and surveillance requirements are not changing. Their control will be maintained in the Updated FSAR where changes must be evaluated in accordance with 10 CFR 50.59. Since this is a programmatic change there will not be an increase in the probability or consequences of an accident previously evaluated.
2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The requirement to maintain operability of the fire protection features and to perform surveillance requirements will be controlled in the Updated FSAR. Since this is an administrative type change, the possibility of a new or different kind of accident from any accident previously evaluated will not be created.
3. The proposed amendment does not involve a significant reduction in the margin of safety. Since the change is programmatic and administrative in nature and operability or surveillance requirements are not changing, this proposed change will not involve a reduction in the margin of safety.

Proposed Change No. 3:

Delete Unit 1 & 2 minimum Fire Brigade staffing requirement in Technical Specification 6.2.2g.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequence of an accident previously evaluated. The current fire brigade staffing requirements will be administratively controlled and maintained in the Updated FSAR. Therefore, the deletion of Technical Specification 6.2.2.g and the placement of the same requirement into the Updated FSAR will not increase the probability or consequences of an accident previously evaluated.
2. The proposed amendment does not create the possibility of a new or different kind of accident previously evaluated. The requirement to maintain the minimum staffing requirements will be retained in the Updated FSAR instead of the Technical Specifications. Since this is an administrative type change, the possibility of a new or different kind of accident from any accident previously evaluated will not be created by this change.
3. The proposed amendment does not involve a significant reduction in the margin of safety. Since the staffing levels of the current requirements for the fire brigade are not being reduced, the proposed change will not involve a reduction in the margin of safety.

Proposed Change No. 4:

Delete Unit 1 & 2 Special Report requirements in Technical Specifications, 6.9.2 d, g, and h.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequence of an accident previously evaluated. The reporting requirements proposed for deletion do not affect the operation of the facility. Existing compensatory action associated with the component specific action statements are being maintained in effect so the level of fire protection is unchanged. Therefore, this change will not increase the probability or consequences of an accident.

2. The proposed amendment does not create the possibility of a new or different kind of accident previously evaluated. As stated in Item 1 above, deletion of these special reports does not affect the operation of the facility. Consequently, the possibility of a new or different kind of accident previously evaluated will not be created by this change.

3. The proposed amendment does not involve a significant reduction in the margin of safety. As stated in Item 1 above, existing compensatory action associated with the component specific action statements are being maintained in effect so the level of fire protection is unchanged. Additionally, 10 CFR 50.72 and 10 CFR 50.73 provide criteria, that if met as a result of fire protection deficiencies, would require notification to NRC. Accordingly, this proposed change will not involve a reduction in the margin of safety.