



**Carolina Power & Light Company**

P.O. Box 1551 • Raleigh, N.C. 27602

SERIAL: NLS-90-251  
10CFR50.90  
90TSB16

G. E. VAUGHN  
Vice President  
Nuclear Services Department

JAN 07 1991

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  
GENERIC LETTER 90-09 - SNUBBER VISUAL INSPECTION INTERVALS

Gentlemen:

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

The proposed amendment revises the visual inspection surveillance requirements and acceptance criteria associated with Technical Specification 3/4.7.5, Snubbers, in accordance with the guidance provided in Generic Letter 90-09, Alternative Requirements For Snubber Visual Inspection Intervals And Corrective Actions, dated December 11, 1990.

The current 18-month inspection interval requires visual inspections of inaccessible snubbers on Brunswick Unit 2 to be completed by July 29, 1991. As such, these visual inspections are currently planned for completion during a three week outage scheduled to begin on April 13, 1991 for performance of certain periodic tests. Issuance of the proposed amendment, which follows the guidance of Generic Letter 90-09, will allow inspection of the inaccessible snubbers to be performed during the upcoming Unit 2 Reload 9 outage, currently scheduled to begin on September 7, 1991. Performing the inspections during the Reload 9 outage and after the planned chemical decontamination will result in a dose savings of approximately 6.6 manrem. Based on this reasoning, Carolina Power & Light Company requests that the proposed amendment be issued by April 1, 1991 in order to realize these ALARA benefits.

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 the proposed Technical Specification pages for Unit 1.

Enclosure 4 provides the proposed Technical Specification pages for Unit 2.

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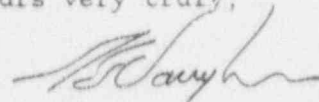
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In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendments, once approved by the NRC, be issued with an effective date to be no later than 60 days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

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

Yours very truly,



G. E. Vaughn

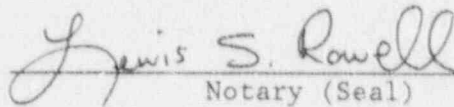
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Enclosures:

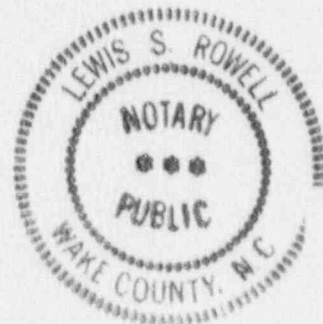
1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Technical Specification Pages - Unit 1
4. Technical Specification Pages - Unit 2

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

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



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  
GENERIC LETTER 90-09 - SNUBBER VISUAL INSPECTION INTERVALS

BASIS FOR CHANGE REQUEST

Proposed Change

The proposed amendment revises the visual inspection surveillance requirements and acceptance criteria associated with Technical Specification 3/4.7.5, Snubbers, in accordance with the guidance provided in Generic Letter 90-09, Alternative Requirements For Snubber Visual Inspection Intervals And Corrective Actions, dated December 11, 1990.

Basis

Performance of periodic visual inspections of snubbers complements the existing functional testing program and provides additional confidence in snubber operability. The existing Technical Specification surveillance schedule is based on the number of inoperable snubbers found during the previous inspection. In addition, the existing surveillance interval assumes an 18-month refueling interval which does not account for the trend to longer fuel cycles or the impact of extended outages such as the Brunswick Unit 2 Reload 8 outage during which portions of the recirculation piping were replaced.

The proposed amendment alleviates this situation by incorporating the alternative inspection schedule provided by the Staff in Generic Letter 90-09, dated December 11, 1990. The alternative inspection schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations and may be as long as 48 months with good overall visual inspection results. As determined by the Staff, the alternate schedule for visual inspections maintains the same confidence level in snubber operability as the existing schedule while allowing the flexibility to perform visual inspections and corrective actions during plant outages. Because this line-item Technical Specification improvement will reduce future occupational radiation exposure and is highly cost effective, the alternative inspection schedule is consistent with the Commission's policy statement on Technical Specification Improvements.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
NRC DOCKETS 50-325 & 50-324  
OPERATING LICENSES DPR-71 & DPR-62  
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BASIS FOR CHANGE REQUEST

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(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

The proposed amendment revises the visual inspection surveillance requirements and acceptance criteria associated with Technical Specification 3/4.7.5, Snubbers, in accordance with the guidance provided in Generic Letter 90-09, Alternative Requirements For Snubber Visual Inspection Intervals And Corrective Actions, dated December 11, 1990.

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 proposed change does not result in any physical change to the facility which could cause an increase in the probability or consequences of any previously evaluated accident. The requested change incorporates the alternative inspection schedule provided by the Staff in Generic Letter 90-09, dated December 11, 1990. As determined by the Staff, the alternate schedule for visual inspections maintains the same confidence level as the existing schedule and, therefore, does not affect 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 proposed amendment does not alter any plant operations, other than the

snubber visual inspection surveillance interval, maintenance requirements, or system design or functions. The Staff has previously reviewed these changes and determined that the alternative visual inspection interval maintains the same confidence level in snubber operability. Therefore, no possibility of creating a new or different type of accident would result from the proposed amendment.

3. The proposed amendment does not involve a significant reduction in the margin of safety. As stated above, the proposed amendment incorporates the alternative Technical Specification requirements for visual inspections of snubbers provided by the Staff in Generic Letter 90-09. The Staff has previously reviewed these changes and determined that the alternative visual inspection interval maintains the same confidence level in snubber operability. Therefore, the proposed amendment does not involve a reduction in the margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
NRC DOCKETS 50-325 & 50-324  
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TECHNICAL SPECIFICATION PAGES - UNIT 1