



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 200 TO FACILITY OPERATING LICENSE NO. DPR-71  
AND AMENDMENT NO. \_\_\_\_\_ TO FACILITY OPERATING LICENSE NO. DPR-62  
CAROLINA POWER & LIGHT COMPANY  
BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324

1.0 INTRODUCTION

By letter dated January 4, 1991, as supplemented on June 24, 1991, December 19, 1991, and October 15, 1993, the Carolina Power & Light Company (the licensee) submitted a request for changes to the Brunswick Steam Electric Plant (BSEP), Units 1 and 2, Technical Specifications (TS). The requested changes would relocate the BSEP, Units 1 and 2, fire protection requirements from the TS to the BSFP Updated Final Safety Analysis Report (UFSAR) fire protection program. This change is in accordance with the guidance provided in Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," April 24, 1986, and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications," August 2, 1988. The following evaluation is based on the staff's review of the licensee's submittals and the supporting materials provided with the letters. The October 15, 1993, letter provided clarifying information that did not change either the initial or the February 5, 1992, proposed no significant hazards consideration determinations.

2.0 EVALUATION

The TS changes proposed by CP&L are as follows:

1. Delete TS 3.3.5.7 (Fire Detection Instrumentation), TS 3.7.7.1 (Fire Suppression Water System), TS 3.7.7.2, (Spray and/or Sprinkler Systems), TS 3.7.7.3, (High Pressure Carbon Dioxide), TS 3.7.7.4 (Fire Hose Stations), TS 3.7.7.5, (Foam Systems), and TS 3.7.8, (Fire Barrier Penetrations) and their associated bases and incorporate into the Updated Final Safety Analysis Report (UFSAR).
2. Delete TS 6.2.2.g for site fire brigade staffing and incorporate into the UFSAR.
3. Delete TS 6.4.2 requirements related to the fire brigade training program and incorporate into the UFSAR.

4. Add TS 6.5.3.8(m) to include the review of the fire protection program and implementing procedures as an additional responsibility of the Plant Nuclear Safety Committee (PNSC).
5. Delete TS 6.9.2.d related to the requirement for special reports for fire detection instrumentation.
6. Delete TS 6.9.2.g related to the requirement for special reports for fire suppression systems.
7. Delete TS 6.9.2.h related to the requirement for special reports for fire barrier penetrations.

The licensee also proposed to replace the current fire protection licensee condition with the standard license condition provided in GL 86-10. The standard fire protection license condition as applied to BSEP would be as follows:

Carolina Power and Light Company shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SERs dated November 22, 1977, April 1979, June 11, 1980, December 30, 1986, December 6, 1989, July 28, 1993, and January , 1994, respectively, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

The NRC staff reviewed the license amendment request for BSEP against the guidance provided in GLs 86-10 and 88-12. Generic Letter 86-10 requested that the licensee incorporate the NRC-approved fire protection program into its Final Safety Analysis Report (FSAR) for the facility and specified a standard fire protection license condition. Generic Letter 88-12 addressed the elements a licensee should include in a license amendment request to remove fire protection requirements from TS. These elements are (1) the NRC-approved fire protection program must be incorporated into the FSAR, (2) the Limiting Conditions of Operations and the Surveillance Requirements associated with fire detection systems, fire suppression systems, fire barriers, and the administrative controls that address fire brigade staffing would be deleted from the TS (the existing administrative controls related to fire protection audits would be retained in the TS), (3) all operational conditions, remedial actions, and test requirements presently included in the TS for these systems, as well as the fire brigade staffing requirements, shall be incorporated into the fire protection program, (4) the standard fire protection license condition specified in GL 86-10 must be included in the facility operating license, (5) the unit review group (Onsite Review Group) shall be given responsibility for the review of the fire protection program and implementing procedures and for the submittal of recommended changes to the company nuclear review and audit group (Off-Site or Corporate Review Group), and (6) the fire

protection program implementation shall be added to the list of elements for which written procedures shall be established, implemented, and maintained.

CP&L incorporated the NRC-approved fire protection program for BSEP into the BSEP UFSAR on June 1, 1987, as amended May 31, 1991. The licensee has, therefore, satisfied element 1 of GL 88-12.

The licensee will incorporate the current TS operability and surveillance requirements for the fire detection systems, fire suppression systems, and fire rated assemblies into the BSEP UFSAR. The licensee will also incorporate the TS requirements related to fire brigade training and staffing into the UFSAR. Therefore, the licensee has satisfied elements 1, 2, and 3 of GL 88-12.

The licensee proposed the standard fire protection license condition specified in GL 86-10 for BSEP Units 1 and 2. The licensee has, therefore, satisfied element 4 of GL 88-12.

To satisfy elements 5 and 6 of GL 88-12, the licensee will add TS 6.5.3.8.(m) to include the review of the fire protection program and implementing procedures as an additional responsibility of the PNSC. Element 6 of GL 88-12 specified that the licensee add fire protection program implementation to the list of elements for which written procedures shall be established, implemented, and maintained. BSEP TS 6.8.1(i) currently addresses the fire protection program; therefore, no changes are required. The licensee has, therefore, satisfied elements 5 and 6 of GL 88-12.

The licensee also proposed to delete TS 6.9.2.d, 6.9.2.g, and 6.9.2.h related to the requirement of special reports of fire detection instrumentation, fire suppression systems and fire barrier penetration. The TS for the detection instrumentation, fire suppression systems and fire barrier penetration will be deleted by this amendment. Therefore, these reporting requirements will no longer be applicable to the BSEP TS. The deletion of TS 6.9.2.d, 6.9.2.g and 6.9.2.h is, therefore, acceptable.

NRC staff guidance regarding TS for alternate shutdown equipment was discussed with the licensee during a telephone conference of July 9, 1992. The licensee informed the staff that the BSEP TS do not include TS for alternative shutdown equipment as specified in GL 81-12. The staff informed the licensee that it would pursue the licensee's implementation of alternative safe shutdown equipment TS, consistent with GL 81-12, independent of this license amendment.

The staff finds that the proposed TS amendment for BSEP is generally in accordance with the NRC staff guidance provided in GLs 86-10 and 88-12 and is, therefore, satisfactory.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of North Carolina official was notified of the proposed issuance of the amendments. The State official had no comments.

#### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (56 FR 11722 and 57 FR 4485). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: A. Singh

Date: February 10, 1994