CP&L

Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

APR 01 1983

Serial: LAP 83-93

E. E. UTLEY
Executive Vice President
Power Supply and Engineering & Construction

Director of Nuclear Reactor Regulation
Attention: Mr. D. B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D.C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-324
LICENSE NO. DPR-62
TMI CONFIRMATORY ORDER

Dear Mr. Vassallo:

On March 14, 1983, Robert A. Purple, Deputy Director of the Office of Nuclear Reactor Regulations Division of Licensing of the Nuclear Regulatory Commission (NRC), issued the NRC Order Confirming License Commitments on Post-TMI Related Issues (TMI Confirmatory Order) for Brunswick Steam Electric Plant, Unit 2 (hereinafter Brunswick 2). Said Order was issued for the purpose of confirming certain commitments to implement Post-TMI related actions as set forth in NUREG-0737.

MOTION

Pursuant to 10 CFR 2.730 and 2.204, Carolina Power & Light Company (CP&L) hereby respectfully moves the Director of Nuclear Reactor Regulation to modify the schedule of three commitment dates set forth in that Order, or, in the alternative, request a hearing with regard to said Order.

Carolina Power & Light Company seeks relief from the commitment dates contained in said Order for three items for Brunswick 2. The specific items are II.B.3, Post Accident Sampling capability; II.F.1.1, Accident Monitoring, noble gas effluent monitors; and II.F.1.5, Accident Monitoring, continuous indication of containment water level. Carolina Power & Light Company requests that these completion dates be changed to September 30,1983, based upon the following:

1. The June 1, 1983, completion dates referenced in the Order were originally chosen to allow approximately ninety days after the end of the Unit No. 1 outage (originally scheduled September 4, 1982 - February 4, 1983) to complete the nonoutage portions of those modifications (both Brunswick 1 and Brunswick 2).

A046 Add: EDO/ACB
ELD/RED
NRR/PPAS
R. A. Purple

2. The site's involvement in the regulatory reviews and corrections of late 1982, and the November 1982 Brunswick 2 outage for Residual Heat Removal (RHR) weld repairs and the Main Steam Isolation Valve (MSIV) galling problem, diverted many of the resources that had been scheduled to work the nonoutage portions of these modifications. As a result, Brunswick 1 began its present refueling outage on December 11, 1982, approximately three months late and prior to completing the nonoutage related work on Brunswick 2. Additional work on Brunswick 1 has extended the Brunswick 1 outage completion date until June 24, 1983, and further impacted on available resources.

3. The ten-day Brunswick 2 maintenance outage scheduled for April 9, 1983, is required to permit completion of those portions of the subject TMI modifications that necessitate an outage for installation. Carolina Power & Light Company will then restart and operate Brunswick 2 until the extended maintenance outage currently scheduled to begin September 3, 1983. Carolina Power & Light Company proposes to wait until the end of the Brunswick 1 outage to recommence work on the remaining Brunswick 2 TMI modifications which do not require an outage as discussed above. In this way, Brunswick 1 will be assured of having the maximum available resources to complete the Brunswick 1 TMI modifications and restart on time. Without relief from the commitment date the scheduled completion of Brunswick Unit 1 outage will be jeopardized.

4. Following the startup of Brunswick 1, resources would be reassigned to Brunswick 2 for completion of the TMI modifications over the summer while both units are in operation. The effluent stack monitor which requires a dual unit outage will be completed prior to the June 1, 1983, deadline.

5. Until installation of these modifications is completed on Brunswick 2, CP&L will continue the interim compensating measures which have already been implemented. Carolina Power & Light Company believes these measures are sufficient for the following reasons.

a. NUREG-0737 ITEM II.B.3 POST ACCIDENT SAMPLING

(1) Interim sampling measures have been established to allow sampling of reactor coolant following an accident causing extensive fuel element damage. This is predicated on achieving access to the Reactor Building, and was discussed in an April 23, 1982, letter from CP&L to the NRC. The interim sampling system is maintained in a ready state and checked monthly. Although it would not be possible to provide sampling and subsequent analysis of the reactor coolant following a Loss of Coolant Accident (LOCA) event within the prescribed time period of NUREG-0737, the likelihood of such a postulated event occurring in the next several months is extremely remote.

(2) Post Accident Sampling is a non-safety-related system, and is therefore not technically required for safe operation of the plant.

b. NUREG-0737 ITEMS II.F.1-1 ACCIDENT EFFLUENT MONITORING

(1) As discussed in the CP&L letter of April 23, 1982, containing CP&L's response to the NRC, there are existing low-range effluent noble gas, iodine and particulate monitoring systems for the two (2) Turbine Building Vents. Each effluent point is augmented by a temporary high-range gross activity effluent monitor.

(2) None of the effluent monitoring systems to be delayed are safety-related. The existing systems provide adequate monitoring, but have a narrower-range than that required by NUREG-0737.

c. NUREG-0737 ITEM II.F.1-5 WIDE RANGE CONTAINMENT WATER LEVEL MONITORING

(1) There are existing containment (Torus) water level monitoring systems which provide two (2) redundant channels of narrow-range and wide-range (-6 to +6 feet levels).

(2) Although one loop of instrumentation in each division is designated as safety-related, none of the instrumentation provides signals for automatic initiation of any safety systems. All instrumentation either provides information (including indication, recording and annunciation) for normal operation or for operators to initiate manual actions in a post-accident situation. Brunswick 2 wide-range level measurement is narrower than the range required. Since procedure actions are based on current level instrumentation, the existing low-range of measurement is conservative (-6 feet vs -10 feet).

6. Following the end of the ten day dual unit outage, the Brunswick 2 Post Accident sampling system will be approximately 95% installed and 40% tested. The heat tracing of certain sample lines will be approximately 50% installed but untested. The Turbine Building Vent Effluent Radiation Monitoring System will be approximately 60% installed and 10% tested. The Wide Range Torus Water Level instrumentation should be 80-90% installed. All remaining work will be done while Brunswick 2 is operating.

7. Carolina Power & Light Company recognizes and accepts its responsibility to ensure compliance with NRC requirements. However, CP&L believes that the brevity of the requested extension, when viewed against the status of the many completed modifications, the installed compensatory devices, the difficulty of the previous year's operating schedule, and the benefits to be gained by the public will justify the granting of this motion.

WHEREFORE, in seeking relief from the commitment dates contained in the TMI Confirmatory Order (Brunswick 2) for the three items set forth above CP&L requests:

1. That the Director of Nuclear Reactor Regulation modify the schedule of commitment dates set forth in the Order Confirming License Commitments on Post-TMI Related Issues (Brunswick 2), dated March 14, 1983;

2. In the alternative, that CP&L be granted a hearing on said Order, pursuant to 10 CFR 2.204.

Should you have any questions regarding this request, please do not hesitate to contact me.

Yours very truly,

M A McDuffie for E. E. Utley

M. A. McDuffie
~~E. E. Utley~~, 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.

Lisa M. Randall
Notary Public

My Commission Expires: 5/18/83

Counsel for Licensee

Samantha Francis Flynn
Samantha Francis Flynn

Hill Carrow
Hill Carrow

JSD/ce (6500JSD)

cc: Mr. D. O. Myers (NRC-BSEP)
Mr. J. P. O'Reilly (NRC-RII)
Mr. S. D. MacKay (NRC)