



Carolina Power & Light Company
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June 17, 1994

SERIAL: BSEP 94-0231
10 CFR 50.90
TSC 94TSB03

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
REMOVAL OF PRESSURE-TEMPERATURE CURVES AND VESSEL SURVEILLANCE
CAPSULE WITHDRAWAL SCHEDULE FROM TECHNICAL SPECIFICATIONS

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 Appendix A of Operating Licenses DPR-71 and DPR-62 (the Technical Specifications) for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2.

The proposed amendment would remove the heatup and cooldown limitation curves from Technical Specification Section 3/4.4.6 and relocate them to a newly created Pressure and Temperature Limits Report, consistent with NUREG-1433, Improved Standard Technical Specifications, BWR-4. Also, this proposed amendment would remove the reactor vessel material surveillance program withdrawal schedule, Technical Specification Table 4.4.6.3-1, and relocate it to the Updated Final Safety Analysis Report (during the Amendment 13 update), per the guidance in Generic Letter 91-01. These changes are administrative in nature and do not alter the configuration or operation of the facility.

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

Enclosure 2 details, in accordance with 10 CFR 50.91(a), 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 issuance of the amendment.

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Enclosure 4 provides page change instructions for incorporating the proposed revisions.

Enclosure 5 provides the proposed Technical Specification pages for Unit 1.

Enclosure 6 provides the proposed Technical Specification pages for Unit 2.

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 amendment.

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. R. P. Lopriore, Manager-Regulatory Affairs, at (910) 457-2212.

Very truly yours,



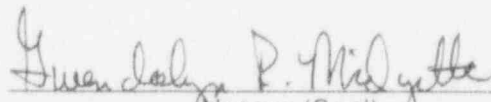
R. A. Anderson

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Enclosures:

1. Basis for Change Request
2. 10 CFR 50.91(a) Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Technical Specification Pages - Unit 1
6. Technical Specification Pages - Unit 2

R. 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.



Gwen Dolyn P. Molyette
Notary (Seal)

My commission expires: August 12, 1996

cc: Mr. Dayne H. Brown, Director - Division of Radiation Protection, State of NC
Mr. S. D. Ebnetter, NRC Region II - Regional Administrator
Mr. P. D. Milano, NRC/NRR Senior Project Manager - Brunswick
Mr. R. L. Prevatte, NRC Senior Resident Inspector - Brunswick

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
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BASIS FOR CHANGE REQUEST

Proposed Change:

The proposed amendment would remove the heatup and cooldown limitation curves from the Technical Specifications Section 3/4.4.6 and relocate them to a newly created Pressure and Temperature Limits Report. Also, this proposed amendment would remove the reactor vessel material surveillance program withdrawal schedule, Technical Specification Table 4.4.6.1.3-1, and relocate it to the Updated Final Safety Analysis Report (during the Amendment 13 update), per the guidance in Generic Letter 91-01.

Basis:

The reactor vessel pressure and temperature are not assumed to be initiators of analyzed events. However, pressure and temperature limits do preclude operation in an unanalyzed condition. The relocated limitations provide an equivalent level of protection to the existing limitations. Thus, there will be no change in the probability of vessel failure through crack propagation. Reactor vessel integrity is assumed in mitigating the consequences of design basis accidents. The relocated limitations will not affect the performance of any safety systems or structures beyond ensuring the continued integrity of Brunswicks reactor vessels.

The pressure and temperature limits, although not in Technical Specifications, will continue to be followed in the operation of the Brunswick Steam Electric Plant. The proposed amendment still requires the same actions to be taken when or if the limits are exceeded as is required by current Technical Specifications. The limits within the Pressure and Temperature Limits Report (PTLR) will be implemented and controlled per Brunswick Procedures. Any changes to the PTLR will be in accordance with NRC approved methodology. Changes to the PTLR will be performed per the requirements of 10 CFR 50.59.

Also, the removal of Table 4.4.6.1.3-1, Reactor Vessel Material Surveillance Program Capsule Withdrawal Schedule, per the guidance in NRC Generic Letter (GL) 91-01 has been reviewed and approved, on a generic basis, by the NRC. As outlined in GL 91-01, this table will be relocated to the Updated Final Safety Analysis Report (UFSAR). The removal of the Reactor Vessel Material Surveillance Program Capsule Withdrawal Schedule will not have any effects on the operation of the Brunswick Plant, this relocation is administrative in nature.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
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10 CFR 50.91(a) EVALUATION

Pursuant to 10 CFR 50.91(a) this evaluation responds to the staffs proposed determination, under the 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. Pursuant to 10 CFR 50.91(a)(1), Carolina Power & Light Company has reviewed this proposed license amendment request and believes that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change:

The proposed amendment would remove the heatup and cooldown limitation curves from Technical Specification Section 3/4.4.6 and relocate them to a newly created Pressure and Temperature Limits Report. Also, this proposed amendment would remove the reactor vessel material surveillance program withdrawal schedule, Technical Specification Table 4.4.6.1.3-1, and relocate it in the Updated Final Safety Analysis Report, per the guidance in Generic Letter 91-01.

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 because the changes are administrative in nature. These changes do not alter the configuration or operation of the facility. The Limiting Safety Systems Settings and Safety Limits specified in the current Technical Specifications remain unchanged.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected.
3. The proposed amendment does not involve a significant reduction in the margin of safety because these margins are established through the Limiting Conditions of Operation, Limiting Safety System Settings and Safety Limits specified in the Technical Specifications, and since there are no changes to the physical design or operation of the facility, these margins will not be changed.

ENCLOSURE 3

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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; (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(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change:

The proposed amendment would remove the heatup and cooldown limitation curves from Technical Specification Section 3/4.4.6 and relocate them to a newly created Pressure and Temperature Limits Report. Also, this proposed amendment would remove the reactor vessel material surveillance program withdrawal schedule, Technical Specification Table 4.4.6.1.3-1, and relocate it to the Updated Final Safety Analysis Report, per the guidance in Generic Letter 91-01.

Basis:

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.

2. The proposed 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 proposed amendment changes the Technical Specifications to remove the heatup and cooldown limitation curves from the Technical Specifications and relocate them to a newly created Pressure and Temperature Limits Report. Also, this change will remove the reactor vessel material surveillance program withdrawal schedule and relocate it in the Updated Final Safety Analysis Report, per the guidance in Generic Letter 91-01. As such, this administrative change cannot affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed amendment changes the Technical Specifications to remove the heatup and cooldown limitation curves from the Technical Specifications and relocate them to a newly created Pressure and Temperature Limits Report. Also, this change will remove the reactor vessel material surveillance program withdrawal schedule and relocate it in the Updated Final Safety Analysis Report, per the guidance in Generic Letter 91-01. Therefore, the amendment has no effect on either individual or cumulative occupational radiation exposure.

ENCLOSURE 4

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PAGE CHANGE INSTRUCTIONS

UNIT 1

<u>Removed Page</u>	<u>Inserted Page</u>
3/4 4-13	3/4 4-13
3/4 4-14	3/4 4-14
3/4 4-15	-
3/4 4-16	-
3/4 4-17	-
3/4 4-18	-
3/4 4-19	-
3/4 4-20	3/4 4-20

UNIT 2

<u>Removed Page</u>	<u>Inserted Page</u>
3/4 4-13	3/4 4-13
3/4 4-14	3/4 4-14
3/4 4-15	-
3/4 4-16	-
3/4 4-17	-
3/4 4-18	-
3/4 4-19	-
3/4 4-20	3/4 4-20

ENCLOSURE 5

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TECHNICAL SPECIFICATION PAGES - UNIT 1