

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

> BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 DOCKET NOS. 50-325 AND 50-324 LICENSE NOS. DPR-71 AND DPR-62 NUREG-0737 ITEM II.K.3.25 EFFECT OF LOSS OF AC POWER ON PUMP SEALS

Dear Mr. Vassallo:

The purpose of this letter is to clarify our position for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 concerning the requirements for NUREG-0737 Item II.K.3.25, Effect of Loss of AC Power on Pump Seals, as previously submitted in our letter dated June 30, 1981. Carolina Power & Light Company (CP&L) endorses the BWR Owners' Group (BWROG) report, submitted by letter dated May 22, 1981 from D. B. Waters (CP&L) to D. G. Eisenhut (NRC), and the supplement to the report, submitted by letter dated September 21, 1981 from T. J. Dente (Northeast Utilities) to D. G. Eisenhut.

Carolina Power & Light Company would also like to point out that the Brunswick Plant's control rod drive pumps (source for the reactor recirculation pumps' seal water injection) and reactor building closed cooling water pumps (source of seal cooling) can be restarted on emergency AC power (i.e., the diesel generators) by the operator. Emergency Instruction 15.1 instructs the operator to restart these pumps; therefore, recirculation pump seal cooling will only be lost for a few minutes at Brunswick. Eased on Brunswick's design and the test information provided by the BWROG report, we have concluded that the loss of off-site AC power will not significantly degrade the recirculation pump seals.

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Mr. D. B. Vassallo

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If you need any additional information concerning our position on this item, please contact us.

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Yours very truly,

muuan S. R. Zimmerman

Manager Licensing & Permits

BLP/WRM/mag (5711C3T3)

cc: Mr. D. O. Myers (NRC-BSEP) Mr. J. P. O'Reilly (NRC-RII) Mr. J. A. Van Vliet (NRC)