CAROLINA POWER & LIGHT COMPANY BRUNSWICK STEAM ELECTRIC PLANT

POSITION PAPER

ON

**REGULATORY GUIDE 1.97** 

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#### 1.0 INTRODUCTION

This document states Brunswick's position on Regulatory Guide 1.97, Revision 2, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident" (referred to in this document as RG 1.97). In assessing RG 1.97, Brunswick used information contained in ANS 4.5, BWROG Emergency Procedure Guidelines, Brunswick's FSAR, and assessment of RG 1.97 done by the BWROG. Section 2.0 provides Brunswick's general position statement. Section 3.0 provides Brunswick's position statements on the generic RG 1.97 criteria. Section 4.0 details our position on each of the variables listed in Table 1 of RG 1.97. "Agreement" or "Concurrence" means Brunswick will provide/has provided the recommended range and category stated in RG 1.97 unless noted.

### 2.0 GENERAL POSITION STATEMENT

Brunswick concurs with the intent of RG 1.97, which is to ensure that necessary and sufficient instrumentation exists in a nuclear power station for assessing plant and environmental condition during and following an accident as required by 10CFR Part 50, Appendix A and General Design Criteria 13, 19, and 64.

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The position statements given below correspond to the referenced paragraphs in Section C, "REGULATORY POSITION" of RG 1.97.

Paragraph 1.1: Brunswick concurs with this definition.

Paragraph 1.2: Brunswick concurs with this definition.

Paragraph 1.3.1a: Brunswick is an operating plant licensed prior to RG 1.89, "Qualification of Class IE Equipment for Nuclear Power Plants". Brunswick will commit to ensuring environmental qualification as required by NUREG-0588 where applicable and Memorandum and Order CLI-80-21. Additionally, Brunswick will only qualify equipment located in a harsh environment to these requirements. Thus equipment forming part of an instrumentation loop which is located in a mild environment may not be qualified by testing.

> Seismic qualification of existing equipment will be in accordance with Brunswick's FSAR for the original plant design. New equipment will be seismically qualified in accordance with IEEE-344-75. An isolation device will be provided between safety and non-safety portion of loops where engineering analysis requires its use.

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Paragraph 1.3.1b: A third channel of instrumentation for a Category 1 variable will be provided if a failure of one accident monitoring channel results in information ambiguity that would lead operators to defeat or fail to accomplish a required safety function, and if one of the following measures cannot be done:

- Cross-checking with an independent channel that monitors a different variable bearing a known relationship to the failed monitoring channel.
- Perturbing the measured variable to determine the failed channel by observing the response on each instrument.
- Using portable instrumentation to' validate correct channel.

Category 1 instrumentation channels shall be electrically divisionalized and handled in accordance with Brunswick's FSAR design requirements for divisionalized channels and circuits. Generally, Brunswick is designed to IEEE-279-1971.

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Paragraph 1.3.1c: All Category 1 instrument channels shall be powered by plant emergency power sources designed in accordance with Brunswick's FSAR criteria and commitments.

Paragraph 1.3.1d: Brunswick concurs.

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The quality assurance requirements invoked for the Paragraph 1.3.1e: currently installed equipment were the Corporate Quality Assurance Program in effect at the time of purchase. As part of the implementation of this Regulatory Guide, Brunswick will ensure that the equipment associated with Category 1 instrument channels are on the plant's Q-List such that the current Brunswick Quality Assurance Program requirements will be invoked for future procurement, maintenance, and design change activities. Adherence to the requirements of the regulatory guides listed in this paragraph will be done if they are in the Brunswick QA program commitments. Refer to letter OQA-81-026 addressed to Mr. Eisenhut for details on the Brunswick QA program.

Paragraph 1.3.1f: Brunswick concurs with this position.

Paragraph 1.3.1g: Brunswick concurs with this position.

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Paragraph 1.3.2a: Brunswick's position on these criteria for Category 2 instruments are the same as given for paragraph 1.3.1a above. Instruments that are not part of a safetyrelated system will not be seismically qualified unless Brunswick's FSAR invokes seismic requirements for the associated system.

Paragraph 1.3.2b: Brunswick concurs with this position.

Paragraph 1.3.2c: Brunswick concurs with this position.

Paragraph 1.3.2d: Brunswick's position on quality assurance requirements for category 2 safety-related instruments is the same as stated for paragraph 1.3.1e above. For non-safety related category 2 instruments the need for quality assurance requirements will be evaluated on a case-bycase basis. In general, quality assurance program requirements will not be imposed on non-safety related Category 2 instruments.

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Paragraph 1.3.2e: Brunswick concurs with this position.

Paragraph 1.3.2f: Brunswick concurs with this position.

Paragraph 1.3.3a: Brunswick concurs with this position with the understanding that environmental qualification testing is not necessary in selecting equipment for the service environment.

Paragraph 1.3.3b: Brunswick concurs with this position.

Paragraph 1.4.a: Isolation devices will be provided between monitoring instrument channel and other user circuit only if the other circuit is designed to less stringent requirements, and engineering analysis requires its use.

Paragraph 1.4.b: Brunswick believes the identification of instruments for post-accident monitoring falls into the realm of human factors engineering and must take into consideration all current activities such as control board review, new emergency guidelines and procedures. By incorporating these activities and RG 1.97 into an integrated project (SECY 82-111) the NRC has ensured that human factors engineering and integration is achieved. Brunswick will not commit to labeling the instruments but will develop a philosophy regarding instrument channel identification as part of the SECY-82-111 project. We believe this meets the intent of the guideline position.

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Paragraph 1.5.a: Servicing, testing, and calibration procedures will be established and performed on a frequency necessary to maintain instrumentation capability. The frequency of servicing, testing, and calibration will be established from equipment experience data. The capability to service, test and calibrate the instruments during plant operation will be provided where necessary and feasible to do so.

Paragraph 1.5.b: Brunswick concurs with this position.

Paragraph 1.5.c: The utilization of design features such as locked cabinets and seals to allow establishment of controlled access to equipment setpoint, calibration and other adjustments is not feasible at Brunswick. Brunswick does not usually endorse such design considerations, but relies on procedure controls and personnel training.

Paragraph 1.5.d: Brunswick concurs with this position.

Paragraph 1.5.e: Brunswick concurs with this position.

Paragraph 1.5.f: Brunswick generally concurs with this position. However, several exceptions are specified in Section 4.0.

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Paragraph 1.5.h: Periodic checking, testing, calibration and calibration verification for protection instrumentation is in accordance with IEEE-338-1971, "Trial - Use Criteria for the Periodic Testing of Nuclear Power Generating Stations Protective Systems."

Paragraph 1.6: Brunswick's specific position on each variable is given in Section 4.0.

#### Regulatory Guide Section C.2

Paragraphs 2.1, 2.2,

2.3 and 2.4: Brunswick concurs with these positions.

Paragraph 2.5: Brunswick's position is outlined in our positions stated for paragraphs 1.3.1a through 1.3.3b, 1.4a, 1.4b and 1.6.

### 4.0 PLANT-SPECIFIC POSITION ON EACH VARIABLE

4.1 Plant-Specific Variables Considered by Brunswick to be Type A

RG 1.97 defines Type A variables as "those variables to be monitored that provide the primary information required to permit the control room operator to take specific manually controlled actions for which

4.1 Plant-Specific Variables Considered by Brunswick to be Type A (Cont'd)

no automatic control is provided and that are required for safety systems to accomplish their safety functions for design basis events". Primary information is defined by RG 1.97 as "information that is essential for the direct accomplishment of the specified safety functions." (Variables associated with contingency actions that may be identified in written procedures are excluded from this definition of primary information.) The following paragraphs discuss each Type A variable by designating the safety function(s), operator action(s), and giving a measurement range for the variable. All Type A variables are category one and have been or will be provided at Brunswick.

## 4.1.1 Variable A1 - RPV Pressure

The RPV Pressure gives the information needed for the operator to maintain core cooling and reactor coolant system integrity. Operator action calls for depressurizing the RPV to maintain a safe cooldown rate by any of several systems, such as HPCI, RCIC, ADS, and RWCU. The operator can also manually open one SRV to reduce pressure to below the SRV setpoint if any SRV is cycling. The range

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4.1.1 Variable Al - RPV Pressure

recommended for this variable is 0 to 1500 psig in accordance with FSAR Section 5.2.2.2 and FSAR Table 7.5.1-1.

4.1.2 Variable A2-RPV Water Level

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The RPV Water Level gives the information needed by the operator to restore and maintain RPV water level. The range recommended for this variable is -180 to +295 inches of water. The installed range will meet or exceed the recommended range.

4.1.3 Variable A3 - Suppression Pool Water Temperature

Suppression Pool Water temperature gives the information needed by the operator to maintain containment integrity and reactor coolant system integrity. Operator actions are: Operate available suppression pool cooling system when the suppression pool temperature exceeds the normal operating limit, maintain RPV pressure at a reduced pressure if the suppression pool temperature cannot be maintained below the heat capabity temperature limit, and attempt to close any stuck open relief valve. The recommended range for this variable is 30° to 230°F. The installed range will meet or exceed the recommended range.

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4.1 <u>Plant-Specific Variables Considered by Brunswick to be Type A</u> (Cont'd)

### 4.1.4 Variable A4 - Suppression Pool Water Level

Suppression pool water level provides information necessary for the operator to maintain containment integrity. Operator action calls for maintaining suppression pool water level within normal operating limits. If the suppression pool water level cannot be maintained below the suppression pool load limit, the operator is to maintain the RPV pressure below its corresponding limit. The range will be approximately minus ten feet, which is the midplane of the lowest ECCS suction line to a position six feet above normal water level. This range follows from NUREG-0737 Item II.F.1, Attachment 5.

### 4.1.5 Variable A5 - Drywell Pressure

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Drywell pressure provides information necessary for the operator to maintain containment and reactor coolant system integrities. Operation action is to control primary containment pressure by containment pressure control systems. A range of minus 5 to plus 245 psig is provided and is in accordance with NUREG-0578. See PM 80-025, 026.

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## 4.1 Plant-Specific Variables Considered by Brunswick to be Type A

### 4.1.6 Variable A6 - Drywell Temperature

Drywell temperature provides information necessary for the operator to maintain containment and reactor coolant system integrities. Operator action is to operate the drywell cooling system and those systems necessary to compensate reactor water level. The range recommended for this variable is 40° to 440°F. See Brunswick's FSAR section 6.2.1.1.1, page 6.2.1-4.

### 4.1.7 Variable A7 - Suppression Pool Pressure

The Suppression Pool Pressure gives the information needed by the operator to maintain containment and reactor coolant system integrities. The operator uses this information along with drywell temperature and suppression pool temperature to determine when to initiate the suppression pool and drywell sprays. A suitable range for this variable is minus 5 to plus 245 psig.

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## 4.1.8 Variable A8 - Drywell and Suppression Pool Hydrogen, Oxygen Concentration

Containment Hydrogen and Oxygen concentrations provide information necessary for the operator to maintain containment integrity. Operator action is to initiate the combustible gas control system in the Containment Atmosphere Dilution (CAD) system in the Brunswick design. The ranges for these variables will meet or exceed the requirements of RG 1.97.

### 4.2 Brunswick's Position on RG 1.97 Type B Variables

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RG 1.97 defines Type B variables as those that provide "information about the accomplishment of plant safety functions". Key variables under type B are those variables which most directly indicate the accomplishment of a safety function.

Each variable is discussed in the following paragraphs and where this variable is covered under another variable type, it is indicated.

### 4.2 Brunswick's Position on RG 1.97 Type B Variables

#### 4.2.1 Variable B! - Neutron Flux

The worst case scenario in which neutron flux monitoring would be useful for post-accident monitoring consists of a failure of the control rods to insert (completely or partially) and operator actuation of the standby liquid control system. (If all rods insert, subcriticality is not a factor.) A failure of the control rod drive is not postulated to occur concurrently with a LOCA event. Based on the above scenario this environment is not one in which the neutron monitoring system would be readered inoperable and environmental qualification is not necessary. This position is consistent with Q.12 and A.12 in Supplement No. 2 to IE Bulletin No. 79-01B.

While neutron flux is a key variable for measuring reactivity control, the degree to which this variable is important to safety is another consideration. There is little probability that there would be, simultaneously, a need for this measurement (in terms of operator action to be taken) and an accident environment in which the neutron

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### 4.2 Brunswick's Position on RG 1.97 Type B Variables

### 4.2.1 Variable B1 - Neutron Flux (Cont'd)

monitoring system (NMS) would be rendered inoperable. Additionally, the large number of detectors that are driven into the core soon after shutdown makes it highly probable that one or more of the existing NMS detectors will be inserted and functioning. In light of the regulatory guide's graded approach to importance to safety and our position that this variable is less critical than others, we believe a designation as Category 2 is more appropriate and meets the intent of the regulatory guide.

### 4.2.2 Variable B2 - Control Rod Position

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Brunswick is in agreement with RG 1.97 and indication is provided to monitor this variable.

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4.2 Brunswick's Position on RG 1.97 Type B Variables

### 4.2.2 Variable B2 - Control Rod Position

Brunswick is in agreement with RG 1.97 and indication is provided to monitor this variable.

### 4.2.3 Variable B3 - RCS Soluble Boron Concentration

Brunswick concurs with the ability to obtain a sample of reactor core coolant. Sampling will be done through the Post-Accident Sampling System. Analysis will be performed in accordance with NUREG-0737, Item II.B.3.

## 4.2.4 Variable B4 - Coolant Level in Reactor

Refer to variable A2, paragraph 4.1.2.

### 4.2.5 Variable B5 - BWR Core Thermocouples

Not required at this time per Supplement 1 to NUREG-0737.

## 4.2.6 Variable B6 - RCS Pressure

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Refer to variable Al paragraph 4.1.1.

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4.2 Brunswick's Position on RG 1.97 Type B Variables

### 4.2.7 Variable B7 - Drywell Pressure

Refer to variable AS, paragraph 4.1.5.

### 4.2.8 Variables B8 - Drywell Sump Level

The Brunswick plant design does not require continuous measurement of drywell sump level. A LOCA signal will prevent operation of the sump pumps and will close containment isolation valves to eliminate the possibility of radioactive materials leaking outside the primary containment. During and after a LOCA, the drywell sumps overflow to the suppression pool. Measuring sump level after an accident would not accomplish anything.

### 4.2.9 Variable B9 - Primary Containment Pressure

Total primary containment pressure is monitored by the combination of drywell pressure and suppression pool pressure. Refer to variable A5, paragraph 4.1.5 and variable A7, paragraph 4.1.7.

### 4.2.10 Variable Bl0 - Primary Containment Isolation Valve Position

Brunswick provides position indication for all isolation and containment boundary valves except check valves and manually operated valves.

### 4.3 Brunswick's Position on RG 1.97 Type C Variables

RG 1.97 defines Type C variables as "those variables that provide information to indicate the potential for being breached or the actual breaching of the barriers to fission product releases. The barriers are (1) fuel cladding, (2) primary coolant pressure boundary, and (3) containment." Key variables under Type C are "those variables which most directly indicate the accomplishment of a safety function." Each variable is discussed in the following paragraphs and where this variable is covered under another variable type, it is indicated.

## 4.3.1 <u>C1 - Radioactivity Concentration or Radiation Level in</u> Circulating Primary Coolant

Brunswick does not intend to continuously monitor the radioactivity level of the primary coolant. During normal operation the Radiation Monitoring System provides indication of breach. During accident conditions the Post-Accident Sampling System will provide local indication of

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radioactivity concentration in the reactor coolant while samples are being taken for analysis.

## 4.3.2 Variable C2 - Analysis of Primary Coolant

Brunswick concurs and will provide a system that meets the requirements of NUREG-0737 Item II.B.3.

## 4.3.3 Variable C3 - BWR Thermocouple

See variable B5, paragraph 4.2.5.

4.3.4 Variable C4 - RCS Pressure

The requirements for the variable are met by variable Al, paragraph 4.1.1.

4.3.5 Variable C5 - Primary Containment Area Radiation

See Variable El, paragraph 4.5.1.

### 4.3.6 Variable C6 - Drywell Drain Sumps Level

See discussion for variable B8, paragraph 4.2.8.

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4.3.7 Variable C7 - Suppression Pool Water Level

Refer to variable A4, paragraph 4.1.4.

4.3.8 Variable C8 - Drywell Pressure

Refer to variable A5, paragraph 4.1.5.

4.3.9 Variable C9 - RCS Pressure (0 to 1500 psig)

Refer to variable Al, paragraph 4.1.1.

4.3.10 Variable C10 - Primary Containment Pressure

Refer to varable A5, paragraph 4.1.5 and variable A7, paragraph 4.1.7.

4.3.11 Variable Cl1 - Containment & Drywell Hydrogen Concentration

Refer to variable A8, paragraph 4.1.8.

4.3.12 Variable C12 - Containment & Drywell Oxygen Concentration

Refer to variable A8, paragraph 4.1.8.

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4.3.13 Variable C13 - Containment Effluent Radioactivity - Noble Gases

Refer to variables E4 and E5, paragraph 4.5.4 and 4.5.5.

### 4.3.14 Variable C14 - Radiation Exposure Rate

Not required at this time per Supplement 1 to NUREG-0737.

### 4.3.15 Variable C15 - Effluent Radioactivity - Noble Gases

Refer to variables E4 and E5, paragraph 4.5.4.

### 4.4 Brunswick's Position on RG 1.97 Type D Variables

Type D variables as stated in the RG are, "those variables that provide information to indicate the operation of individual safet" systems and other systems important to safety. These variables are to help the operator make appropriate decisions in using the individual systems important to safety in mitigating the consequences of an accident." Key variables that are type D are defined as "those variables that most directly indicate the operation of a safety system." These variables are discussed in the following paragraphs and where the variable has been covered under another variable type, it is indicated.

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### 4.4 Brunswick's Position on RG 1.97 Type D Variables

### 4.4.1 Variable D1 - Main Feedwater Flow

Brunswick is in agreement with RG 1.97 concerning this variable. At the Brunswick plant there is a minor range deficiency on the high end of 0.212%. This is a negligible value. The "110% of design value" stated in the RG is considered a guideline. Brunswick will use the current value of 12,000,000 #/hr, for high end monitoring.

### 4.4.2 Variable D2 - Condensate Storage Tank Level

Brunswick concurs with RG 1.97.

### 4.4.3 Variable D3 - Suppression Spray Flow

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Brunswick does not concur with RG 1.97 on this variable. For the Brunswick design RHR flow can be used to monitor che operation of primary containment related systems. Also, the following parameters give indication that the safety system is accomplishing its task:

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4.4.3 (Continued)

Drywell Pressure - A5, B7, C8, D4, B9, C10 Drywell Temperature - A6, D7 Suppression Pool Pressure - A7 Suppression Pool Temperature - A3, D6.

RHR flow and the above list of variables provide adequate information to monitor operation of primary containment related systems.

4.4.4 Variable D4 - Drywell Pressure

Brunswick concurs with RG 1.97 on this variable.

4.4.5 Variable D5 - Suppression Pool Water Level

Refer to variable A4, paragraph 4.1.4.

4.4.6 Variable D6 - Suppression Pool Water Temperature

Refer to variable A3, paragraph 4.1.3.

4.4.7 Variable D7 - Drywell Atmosphere Temperature

Refer to variable A6, paragraph 4.1.6.

4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

4.4.8 Variable D8 - Drywell Spray Flow

Brunswick's position on this variable is the same as that discussed under D3, paragraph 4.4.3.

4.4.9 Variables D9 - MSIV Leakage Control System Pressure

These systems are not included in the Brunswick plant design. Brunswick does not intend to add these systems.

4.4.10 <u>Variable D10 - Primary System Safety Relief Valve Positions</u> Including ADS or Flow Through or Pressure in Valve Lines

> Brunswick is in agreement with RG 1.97 on this variable, and provides instrumentation for this variable.

> D11 - Isclation Condenser System Shell-Side Water Level D12 - Isolation Condenser System Valve Position

> These systems are not included in the Brunswick plant design. Brunswick does not intend to add these systems.

4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

4.4.11 Variable D13 - RCIC Flow

Brunswick agrees with the intent of RG 1.97 concerning this variable. Current design has indication as part of the flow controller and therefore indication is not isolated from the control loop. Brunswick does not plan to provide isolation between indication and control. If controller and/or flow indicator fail, RCIC performance can be monitored by monitoring the response of the reactor water level.

4.4.12 Variables -

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D14 - HPCI Flow D15 - Core Spray System Flow D16 - LPCI System Flow

The HPCI and C3 systems each have one branch line - - the test line - - downstream of the flow - measuring element. The test line is provided with a motor operated valve that is normally closed (two valves in series in the case of the HPCI). Further, the valve in the test line closes automatically when the emergency system is activiated, thereby ensuring that indicated flow is not being diverted by the test line. Proper valve position can be verified by a direct indication of valve position. (Although LPCI has

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4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

#### 4.4.12 (Continued)

several branch lines located downstream of each flow measuring element, each of those lines is normally closed.) For all of these systems, there are valid primary indicators other than flow measurement to verify the performance of the emergency system; for example, vessel water level.

The existing flow-measurement schemes for the HPCI, CS and LPCI are all adequate in that they meet the intent of RG 1.97.

## 4.4.13 Variable D17 - SLCS Flow

The SLC system is manually initiated. Flow measuring devices were not provided for this system. The pump discharge header pressure, which is indicated in the control room, will indicate SLC pump operation. Besides the discharge header pressure observation, the operator can verify the proper functioning of the SLCS by monitoring the following:

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4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

4.4.13 Variable D17 - SLCS Flow (Cont'd)

- 1. Decrease in the level of the boric acid storage tank.
- Reactivity change in the reactor as measured by neutron flux.
- 3. Squib valve continuity indicating lights.

The use of these indications is believed to be a valid alternative to SLCS flow indication.

### 4.4.14 Variable D18 - SLCS Storage Tank Level

Brunswick is in agreement with the regulatory guide range of bottom to top level monitoring. At the Brunswick Plant, this level is given in percent.

Brunswick is in disagreement with the category 2 designation for this variable. The current design basis for the SLCS assumes a need for an alternative method of reactivity control without a concurrent loss-of-coolant accident or high-energy line break. The environment in which the SLCS instrumentation must work is therefore a "mild" environment for qualification purposes.

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4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

4.4.14 Variable D18 - SLCS Storage Tank Level (Cont'd)

The current design basis for the SLCS recognizes the system has an importance to safety less than the importance to safety of the reactor protection system and agrees with the graded approach to quality assurance specified in RG 1.97. It is unnecessary to apply a full quality assurance program to this instrumentation. Brunswick will classify this variable category 3. A category 3 requirement is consistent with the 79-01B stand on the SLCS, which is that the system is not required to help mitigate a HELB or a LOCA.

4.4.15 Variable D19 - RHR System Flow

Brunswick concurs with RG 1.97 on this variable.

4.4.16 Variable D20 - RHR Heat Exchanger Outlet Temperature

Brunswick concurs with RG 1.97 on this variable.

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### 4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

### 4.4.17 Variable D21 - Cooling Later Temperature to ESF Components

At Brunswick the Service Water System provides cooling water to the ESF components. Water is taken from the Cape Fear River via the intake canal. It is a once-through, open-loop system designed for 33° to 90°F water temperature according to Brunswick's FSAR. Since there are no heat sources between the intake canal and the ESF components, there will be no significant change in water temperature. Also, there are no operator actions based on water temperature. The EOP's assume a worst-case water temperature and use this in the calculations. Due to this design there is no need for this indication for postaccident monitoring. There are other indications such as cooling water flow that can be used to monitor system operation. Brunswick does not intend to provide this variable.

### 4.4.18 Variable D22 - Cooling Water Flow to ESF System Components

Brunswick concurs with RG 1.97 on this variable and will provide flow measurement and indication of main service water flow in the conventional and nuclear service water headers.

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4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

#### 4.4.19 Variable D23 - High Radioactivity Liquid Tank Level

Brunswick concurs with RG 1.97 on this variable.

## 4.4.20 Variable D24 - Emergency Ventilation Damper Position

Brunswick concurs with RG 1.97 on this variable. Brunswick interprets this variable to be dampers which could release radiation to the surrounding plant environment or expose control room personnel to radiation.

4.4.21 Variable D25 - Status of Standby Power & Other Energy Sources Important to Safety (Electric, Hydraulic, Pneumatic)

> At Brunswick the standby AC power supply and distribution system for the two units consists of four diesel generators and four 4.16 kv Class IE buses. The 4 kv emergency buses are E1, E2, E3 and E4. The voltage is stepped down to the 480V emergency buses E5, E6, E7, and E8. The 480V emergency bus feeds the 120V AC emergency bus.

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4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

The DC standby power is supplied by batteries. The instrument air pressure is supplied by the standby air compressors.

Diesel generator terminal voltage, feeder breaker indication, and feeder breaker trip annunciation are provided in the control room and provide adequate information on bus voltage. Also, process computer points E039, E040 and E042 give El, E2, E3, and E4 feeder bus voltage respectively.

Feeder breaker trip annunciation is available in the control room for both the 480V and the 120V AC emergency buses. Feeder breaker indication and feeder equipment malfunction annunciation are available for the 480V emergency bus.

Brunswick believes that its treatment of this variable is adequate in that it provides information which is consistent with the definition of the Type D variable.

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4.4 Brunswick's Position on RG 1.97 Type D Variables (Cont'd)

### 4.4.22 Plant Designer Selected Variables

In accordance with RG 1.97's statement, "The plant designer should select variables and information display channels required by his design to enable the control room personnel to ascertain the operating status of each individual safety system and other systems important to safety to the extent necessary to determine if each system is operating or can be placed in operation...", Brunswick has selected four additional type D, category 3 variables to monitor. The basis for choosing these variables is the capability of using the main condenser as a heat sink for main steam from the reactor. This involves bypassing the main turbine provided the hotwell level is low enough to accommodate additional condensate, and that there is sufficient vacuum for operation. Verification of the number of condensate pumps running is also recommended. The four variables are:

D26 - Turbine Bypass Valve Position
D27 - Condenser Hotwell Level
D28 - Condenser Vacuum
D29 - Condensate Pump & Booster Pump Status

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### 4.5 Brunswick's Position on RG 1.97 Type E Variables

The RG 1.97 definition for type E variables is: "those variables to be monitored as required for use in determining the magnitude of the release of radioactive materials and for continually assessing such releases." Key variables that are type E are defined as variables that most directly indicate the release of radioactive material. Each variable is discussed in the following paragraphs and Brunswick's position on the variable is given. Where a variable has already been discussed under another type, it is indicated.

## 4.5.1 Variable Ei - Primary Containment Area Radiation - High Range

Brunswick concurs with the RG 1.97 recommendation on this variable and the requirements of NUREG 0737 (Table II.F.1-3). Brunswick is currently installing equipment to measure this variable. Refer to TMI plant modifications 80-030 and 80-031.

## 4.5.2 Variable E2 - Reactor Building or Secondary Containment Area Radiation

See Variable C14, paragraph 4.3.14.
#### 4.0 PLANT-SPECIFIC POSITION ON EACH VARIABLE (Cont'd)

#### 4.5 Brunswick's Position on RG 1.97 Type E Variables (Cont'd)

#### 4.5.3 Variable E3 - Radiation Exposure Rate

The stated purpose of this variable is to monitor buildings or areas where access is required to service safety equipment. The Brunswick plant is not designed for servicing equipment in the reactor building during or after an accident. Redundancy of system design mitigates the requirement for servicing a safety system after an accident.

# 4.5.3 <u>Variables E4 - Noble Gases and Vent Flow Rate</u> E5 - Particulates and Halogens

In the Brunswick design there are five identifiable release points: the stack, two turbine building vents, and two reactor building vents. The instrumentation on the reactor building vents is not required because the reactor building isolates upon the receipt of a high radiation signal to the monitoring instrumentation. CP&L has NRC approved for this position provided in a letter from the NRC dated May 5, 1982, concerning NUREG-0737 Action Items II.F.1.1 (Noble Gas Monitor) and II.F.1.2 (Iodine/Particulate Sampling).

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## 4.0 PLANT-SPECIFIC POSITION ON EACH VARIABLE (Cont'd)

#### 4.5 Brunswick's Position on RG 1.97 Type E Variables

#### 4.5.4 (Continued)

Under variable E4 in RG 1.97, there are six cub-headings. For convenience and clarity of discussion, the six are listed below and their applicability to Brunswick summarized:

RG	1.97	Brunswick
1.	Drywell Purge, SGTS	Stack
2.	Secondary Containment Purge	Reactor Building
3.	Secondary Containment (RX	
	Shield Bldg. Annulus)	N/A
4.	Auxiliary Building	N/A
5.	Common Plant Vent	Stack
6.	All other Release Points	Turbine Vents

Instrumentation for the stack and turbine building vents will be provided through TMI plart modifications 80-034, 35 and 36. These plant modifications meet the requirements of NUREG-0737 and applicable standards and regulatory guides including RG 1.97.

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4.0 PLANT-SPECIFIC POSITION ON .EACH VARIABLE (Cont'd)

4.5 Brunswick's Position on RG 1.97 Type E Variables (Cont'd)

4.5.5 Variable E6 - Radiation Exposure Meters

On hold due to lack of requirements from NRC. Refer to NRC ERRATA dated July 1981.

4.5.6 Variable E7 - Airborne Radiohalogens and Particulates Portable Sampling with On-Site Analysis Capability)

Brunswick concurs with RG 1.97.

4.5.7 Variable E8 - Plant & Environs Radiation (Portable Instrumentation)

Brunswick concurs with RG 1.97.

4.5.8 <u>Variable E9 - Plant & Environs Radioactivity (Portable</u> Instrumentation)

Brunswick concurs with RG 1.97.

4.5.9 Variables E10 - Wind Direction

Ell - Wind Speed

E12 - Estimation of Atmosphere Stability

Brunswick will install new equipment which will meet the recommendations of RG 1.97.

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#### 4.0 PLANT-SPECIFIC POSITION ON EACH VARIABLE (Cont'd)

#### 4.5 Brunswick's Position on RG 1.97 Type E Variables

#### 4.5.10 Variable E13 - Primary Coolant & Sump

Accident Sampling of primary coolant will be done at two points in the jet pump pressure instrument system and from a single sample line connected to both loops in the RHR system. Refer to Plant Modification 80-28 and 80-29.

Sampling of the containment sumps is not necessary at the Brunswick plant because accident conditions will close isolation valves G16-F003, F004, F019 and F020, which prevents release of radioactive materials from primary containment.

#### 4.5.11 Variable E14 - Containment Air

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Containment air sampling will be taken from the drywell and suppression pool atmosphere. Refer to Plant Modification 80-028 and 80-029.

## 5.0 ABBREVIATIONS

\*

NDS .	. 7	Automatic Depressurization System
BWR	-	Boiling Water Reactor
B' 30G	-	Boiling Water Reactor Owners Group
CAD	-	Containment Atmospheric Dilution
CS	-	Core Spray
ECCS	-	Emergency Core Cooling System
ESF	-	Engineered Safety Features
FSAR	-	Final Safety Analysis Report
HPCI	-	High Pressure Coolant Injection
LPCI	-	Low Pressure Coolant Injection
NA	-	Not Applicable
QA	-	Quality Assurance
RCS	-	Reactivity Control System
RCIC		Reactor Core Isolation Cooling
RG	-	Regulatory Guide
RHR	-	Residual Heat Removal
RPV	-	Reactor Pressure Vessel
RWCU	-	Reactor Water Clean Up
RX	-	Reactor
R/hr	-	Rems per hour
SGTS	-	Standby Gas Treatment System
SLCS	-	Standby Liquid Control System
SRV	-	Safety Relief Valve
TMI	-	Three Mile Island

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#### 6.0 REFERENCES

1	ANC	1. 5
1	CPUN	4.3

- 2. Brunswick FSAR
- 3. Brunswick System Descriptions
- 4. BWROG Emergency Procedure Guidelines, Rev. 3 (Prepublication draft)
- 5. BWROG Position Paper on RG 1.97, Rev. 2
- 6. IE Bulletin 79-01B
- 7. NUREG-0578
- 8. NUREG-0737 and Supplement 1
- 9. Plant Modifications:

77-268, Pressure Switch Analog Replacement U1
77-269, Pressure Switch Analog Replacement U2
77-303, CST & MVD Level Indicator Addition & Range Change
80-137, TSC Computer Input Points U1
80-138, TSC Computer Input Points U2
80-180, Nuclear Boiler Instrumentation U1
80-181, Nuclear Boiler Instrumentation U2
81-251, Suppression Pool Instrumentation U1
81-252, Suppression Pool Instrumentation U2
82-049, Drywell RTD Replacement

- 10. RG 1.97, Rev. 2, Rev. 3
- TMI Action Item Plant Modifications: 80-025, Drywell Pressure Instrumentation UI 80-026, Drywell Pressure Instrumentation U2 80-028, Improved Post Accident Sampling UI

#### 6.0 REFERENCES (Cont'd)

11. (Continued)

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80-029, Improved Post Accident Sampling U2 80-030, Containment Rad Monitoring U1 80-031, Containment Rad Monitoring U2 80-032, Containment Hydrogen Monitoring U1 80-033, Containment Hydrogen Monitoring U2 80-034, TB Vent High Range Rad Monitor U1 80-035, TB Vent High Range Rad Monitor U2 80-036, Stack Radiation Monitors 80-078, Wide Range Torus Level U1 80-079, Wide Range Torus Level U2

- 12. 10CFR50 Appendix A and General Design Criteria 13, 19, and 64
- 13. IE Supplement No. 2 to Bulletin No. 79-01B
- NEDC-22253, BWR Owners' Group Evaluation of Containment Isolation Concerns

#### CAROLINA POWER & LIGHT COMPANY

#### BRUNSWICK STEAM ELECTRIC PLANT

#### BRUNSWICK RESPONSE TO NUREG 737 SUPPLEMENT 1 -REGULATORY GUIDE 1.97 - APPLICATION TO EMERGENCY RESPONSE FACILITIES

DATE: <u>8/9/83</u> SUBMITTED BY: <u>WEBrown Mark Warenho</u>. RECOMMENDED BY: <u>Bletternan</u>

APPROVED BY:

an Mallon

REV. NO.	SUBMITTED BY	RECOMMENDED BY	APPROVED BY	DATE
1	Mark aburrho	alltenen	ampalon	1 10/20/83
			/	

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#### GENERAL NOTES

#### Use of Table

4

Each variable contains the eight items, lettered (a) through (h), requested in Supplement 1 to NUREG-0737 on page 14. To the right of each item are two columns. The first column gives Regulatory Guide 1.97 recommendations and the other indicates what is currently provided at Brunswick.

Item (h) describes what action, if any, is to be taken toward the variable.

The designation of 1E appearing under item (e) states that the power supply is fed from standby power.

This report is applicable to Unit 1 and Unit 2. Where differences exist, they are so noted.

Specific Notes (References by specific Variable)

NOTE 1: All essential transmitters are being qualified by 79-01B. Indicators and recorders located in the Control Room shall not be environmentally qualified by testing. Justification for this approach is given in the Brunswick position on RG 1.97, paragraph 1.3.1.a.

NOTE 2: See Brunswick position on RG 1.97, paragraph 1.3.1.e.

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			Recommended by RG 1.97	Provided by Brunswick
(a)	Instrument Ra	nge	0-1500 psig	0-1200 psig
(b)	Environmental	Qualification	Yes	Note 1
(c)	Seismic Qualification		Yes	Note 1
(d)	Quality Assurance		Yes	Note 2
(e)	Power Supply		1E	1E
(f)	Redundance an	d Sensor Location	Yes	Yes
	Sensor	Tag No.	Range	Location
	Transmitter Transmitter	C32-PT-N005A C32-PT-N005B	0-1200 psig 0-1200 psig	H21-P004 - Reactor Building H21-P005 - Reactor building
(g)	Location of D	Display		
	Display	Tag No.	Range	Location
	Indicator Indicator	C32-P1-R605 C32-PR-R608	0-1200 psig 0-1200 psig	H12-P603 - Control Room H12-P603 - Control Room

b

VARIABLE A1 - RPV PRESSURE

(h) Schedule - System will be modified to provide the required range. Work for Unit 1 will be scheduled for completion during refueling outage #5 and work for Unit 2 will be scheduled for completion during refueling #6.

1

#### VARIABLE A2 - RPV WATER LEVEL

		Recommended By RG1.97	Provided by Brunswick
(a)	Instrument Range	-180 to + 295"	-100 to +550"
(b)	Environmental Qualification	Yes	Note 1
(c)	Seismic Qualification	Yes	Note 1
(d)	Quality Assurance	Yes	Note 2
(e)	Power Suppiy	1E	1E
(f)	Redundance and Sensor Location	Yes	Partial Redundancy

Sensor	Tag. No.	Range	Location
Transmitter	B21LT-N036	-100 to + 200"	H21-PC09 - Reactor Building
Transmitter	B21-LT-N037	-100 to + 200"	H21-P010 - Reactor Building
Transmitter	B21-LT-NO26A	0 to 210"	H21-P004A - Reactor Building
Transmitter	B21-LT-N026B	0 to 210"	H21-P005B - Reactor Building
Transmitter	B21-LT-N027	+150 to + 550"	H21-P004B - Reactor Building

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#### VARIABLE A2-RPV WATER LEVEL (Con: )

#### (g) Location of Display

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Display	TEg No.	Range	Location
Indicator	B21-LI-R610	-100 to + 200"	H12-P601 - Control Room
Recorder	B21-LR-R:515	-100 to + 200"	H12-P601 - Control Room
Indicator	B21-LI-R604A	0 to 210"	H12-P603 - Control Room
Indicator	B21-LI-R604B	0 to 210"	H12-P603 - Control Room
Indicator	B21-LI-R605	+150 to + 550"	H12-P603 - Control Room
*Indicator	C32-LI-R606A	+150 to + 210"	H12-P603 - Control Room
*Indicator	C32-LI-R606B	+150 to + 210"	H12-P603 - Control Room
*Indicator	C32-LI-R606C	+150 to + 210"	H12-P603 - Control Room

\*Will not be used for post accident monitoring.

(h) Schedule - Transmitters B21-LT-N036, N037 will be respanned to satisfy the low range requirement. A transmitter and indicator will be added to satisfy redundancy for the high level range.

3

A redundant power supply will be added for B21-LT-N026B. Work for Unit 1 will be scheduled for completion during refueling outage #5 and work for Unit 2 will be scheduled for completion during refueling outage #6. Transmitter B21-LT-N027 will be replaced to comply with environmental qualification on a schedule consistent with IE Bulletin 79-01B and 10CFR50.49.

			Recommended by RG 1.97	Provided by Brunswick
(a)	Instrument Ran	ge	30–230 <sup>0</sup> F	0-400 <sup>°</sup> F
(b)	Environmental	Qualification	Yes	Note 1
(c)	Seismic Qualif	ication	Yes	Note 1
(d)	Quality Assura	nce	Yes	Note 2
(e)	Power Supply		1E	1E
(f)	Redundance and	Sensor Location	Yes	Partial - Div. I and Div. II sensors, but only one recorder.
	Sensor	Tag No.	Range	Location
	RTD RTD	CAC-TE-1258-14 CAC-TE-1258-21	0-400 <sup>°</sup> F 0-400 <sup>°</sup> F	Suppression Pool Suppression Pool
(g)	Location of Di	splay		
	Display	Tag No.	Range	Location
	Recorder	CAC-TR-1258	0-400 <sup>°</sup> F	XU-3 - Control Room
			1 01 050 (11)	the existing temperature

VARIABLE A3 - SUPPRESSION POOL WATER TEMPERATURE

(h) Schedule - Plant Modifications 81-251 and 81-252 will upgrade the existing temperature monitoring system to meet NUREG 0661 requirements and RG 1.97 recommendations. Unit 1 work will be scheduled for completion during refueling outage #4 and Unit 2 work will be scheduled for completion during refueling outage #5.

			Recommended by RG 1.97		Provided	by Brunswick
(a)	Instrument Ran	nge	-10' to +6'		-10' to +	6'
(b)	Environmental	Qualification	Yes		Yes	
(c)	Seismic Quali	fication	Yes		Yes	
(d)	Quality Assur	ance	Yes		Yes	
(e)	Power Supply		1E		1E	
(f)	Redundance &	Sensor Location	Yes		Yes	
	Sensor	Tag Nun	iber	Range		Location
	Transmitter	CAC-LT-	2601	-10' to +6'		Reactor Building
	Transmitter	CAC-LT-	-2602	-10' to +6'		Reactor Building
	Transmitter	CAC-LT-	-3342	.10' to +6'		Reactor Building
	Transmitter	CAC-LT-	-4177	-42" to -18"		Reactor Bullding
(g)	Location of D	isplay				
	Display	Tag Nur	aber	Range		Location
	Indicator	CAC-LI-	-2601	-10' to +6'		XU-51, Control Room
	Recorder	CAC-LR-	-2602	-10' to +6'		XU-51, Control Room
	Indicator	CAC-LI-	-3342	-10' to +6'		IR-RB-4
	Indicator	CAC-LI-	-4177	-42" to -18"		XU-51, Control Room
(h)	Schedule:	No changes are an	nticipated to thi	s instrumentati	on.	

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(h) Schedule:

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VARIABLE A4 - SUPPRESSION POOL WATER LEVEL

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## VARIABLE A5 - DRYWELL PRESSURE

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		Recommended RG 1.97	Provided by Brunswick
(a)	Instrument Range	-5 to +245 psig	-5 to +245 psig
(b)	Environmental Qualification	Yes	Note 1
(c)	Seismic Qualification	Yes	Note 1
(d)	Quality Assurance	Yes	Note 2
(e)	Power Supply	1E	1E
(f)	Redundance & Sensor Location	Yes	Yes

	Sensor	Tag Number	Range	Location
	Transmitter Transmitter	CAC-PT-4175 CAC-PT-4176	-5 to +245 psig -5 to +245 psig	Reactor Building Reactor Building
(g)	Location of Display			
	Display	Tag Number	Range	Location

Recorder	CAC-PR-1257-1	-5 to +245 psig	XU-2 - Control Room
Indicator	CAC-PI-4176	<ul> <li>-5 to +245 psig</li> </ul>	XU-51 - Control Room

(h) Schedule - No changes to existing instrumentation are anticipated.

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			Recommended by RG 1.97	'	Provided by	y Brunswick
(a)	Instrument Range		40° to 440°F		0° to 400°	F
(b)	Environmental Qualificat	ion	Yes		Note 1	
(s)	Seismic Qualification		Yes		Note 1	
(d)	Quality Assurance		Yes		Note 2	
(e)	Power Supply		1E		1E	
(f)	Redundance & Sensor Loca	ation	Yes		Partial - I Sensors, bu	Div. I and Div. II at only one Recorder
	Sensor	Tag Number		Range		Location
	Temperature Element	CAC-TE-1258-1, 7,8,9,10,11,12	,2,3,4,5,6, 2,13,22,23,24	0 to 400 <sup>0</sup>	F	Drywell
(g)	Location of Display					
	Display	Tag Number		Range		Location
	Recorder	CAC-TR-1258		0 <sup>0</sup> to 400	0°F	XU-3 Control Room
(h)	Schedule - The existin and range. 2 work will	ng system will b Unit 1 work wi 1 be scheduled b	be modified to p 111 be scheduled for completion of	provide red d for compl during refu	lundant recon letion during ueling outage	rding* g refueling outage #5 and Unit e #6.

VARIABLE A6 - DRYWE'L TEMPERATURE

\*Redundancy is provided for this variable in that there are at least two sensors at each elevation zone in the drywell. These sensors are not necessarily at the same azimuth.

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			Required by RG 1.97	Provided by Brunswick
(a)	Instrument Range	e	-5 to 186 psig	0-75 psig
(b)	Environmental Q	ualification	Yes	Note 1
(:)	Seismic Qualifie	cation	Yes	Note 1
(d)	Quality Assurance	ce	Yes	Note 2
(e)	Power Supply		1E	1E
(f)	Redundance and	Sensor Location	Yes	No
	Sensor	Tag Number	Range	Location
	Transmitter	CAC-PT-1257-2	0-75 psig	Reactor Building
(g)	Location of Dis	play		
	Display	Tag Number	Range	Location
	Indicator	CAC-PI-1257-3	0-75 psig	XU-51 - Control Room

## VARIABLE A7 - SUPPRESSION POOL PRESSURE

(h) Schedule

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A redundant transmitter and indicator will be installed. The range will be changed to -5 to +245 psig. Unit 1 work will be scheduled for completion during refueling outage #5 and work for Unit 2 will be scheduled for completion during refueling outage #6.

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			Recommended by RG 1.97	Provided by Brunswick
(a)	Instrument Ran	nge		
Hydr Oxyr	rogen gen		0-30% 0-10%	0-5%, 0-25%) Does not meet 12 psia 0-10%, 0-20%) to design pressure recommendation of RG 1.97
(b)	Environmental	Qualification	Yes	Note 1
(c)	Seismic Qualif	fication	Yes	Note 1
(d)	Quality Assura	ance	Yes	Note 2
(e)	Power Supply		1E	1E
(f)	Redundance and	Sensor Location	Yes	Yes
	Sensor	Tag Number	Range	Location
	Monitor Monitor	CAC-AT-1259 CAC-AT-1263	See above See above	Reactor Building Reactor Building
(g)	Location of Di	isplay		

#### VARIABLE A8 - DRYWELL AND SUPPRESSION POOL HYDROGEN & OXYGEN CONCENTRATION

DisplayTag NumberRangeLocationRecorderCAC-AR-1259See aboveXU-51 - Control RoomRecorderCAC-AR-1263See aboveXU-51 - Control Room

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(h) Schedule - The current system will be upgraded to improve reliability. The range and design pressure recommendations of RG 1.97 will be met. Unit 1 is being installed on the current outage. Unit 2 will be upgraded on the next scheduled outage of sufficient duration to accomplish the remaining work.

## VARIABLE B1 - NEUTRON FLUX

(a)Instrument Range $10^{-6}X$ to 100X Full Power $10^{-6}X > Range > 100X$ Full Power(b)Environmental QualificationYesNote 1(c)Seismic QualificationYesNote 1(d)Quality AssuranceYesNote 2(e)Redundence 6 Sensor LocationYesNote 2(f)Power SupplyIEIE(g)Location of DisplayIEIEIndicator IndicatorC51-NI-R600A C51-NI-R600A $10^{-1}_{-1}$ to $10^{6}_{-1}$ counts/secH12-P603 H12-P603 Control RoorIndicator IndicatorC51-NI-R600A C51-NI-R600A $10^{-1}_{-1}$ to $10^{6}_{-1}$ counts/secH12-P603 H12-P603 Control RoorIndicator IndicatorC51-NI-R600A C51-NI-R600A $10^{-1}_{-1}$ to $10^{6}_{-1}$ counts/secH12-P603 H12-P603 Control RoorIndicator IndicatorC51-NI-R600A C51-NI-R600A $10^{-1}_{-1}$ to $10^{6}_{-1}$ counts/secH12-P603 H12-P603 Control RoorIndicator IndicatorC51-NI-R600A C51-NI-R601B $10^{-1}_{-1}$ to $10^{6}_{-1}$ counts/secH12-P603 H HIndicator Recorder Recorder RecorderC51-NI-R601BHHHHHHHHHHHHRecorder RecorderC51-NI-R603BHHHHHRecorder RecorderC51-NI-R603BHHHHHHRecorder RecorderC51-NI-R603BHHHHHH			Recommended By RG 1.97	Provided by Brunsw	ick
Benvironmental Qualification       Yes       Note 1         (c) Seismic Qualification       Yes       Note 1         (d) Quality Assurance       Yes       Note 2         (d) Quality Assurance       Yes       Note 2         (e) Redundance & Sensor Location       Yes       Yes - Sensors are located in reactor core & Sensor Location         (f) Power Supply       1E       1E         (g) Location of Display       Display       Tag No.         Midicator       C51-NI-R600A       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       H12-P603 Control Rood Indicator         Indicator       C51-NI-R600B       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> counts/sec       " " "         Indicator       C51-NI-R600B       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> counts/sec       " " "         Indicator       C51-NI-R600B       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> counts/sec       " " "         Indicator       C51-NI-R601A       -100 to 0 to to to period in sec       " " " "         Indicator       C51-NI-R601A       -100 to * to to 10 period in sec       " " " "       " " "         Indicator       C51-NI-R601A       -100 to * to to 10 period in sec       " " " " "       " " " "         Indicator       C51-NI-R601A       " " " " " " " " " "       " " " " " " "       " " " " " "         Recorder       C51-NI-R603A <td>(a)</td> <td>Instrument Range</td> <td>10<sup>-6</sup>% to 100% Full Power</td> <td>10<sup>-6</sup> % &gt; Range &gt; 100% Full</td> <td>Power</td>	(a)	Instrument Range	10 <sup>-6</sup> % to 100% Full Power	10 <sup>-6</sup> % > Range > 100% Full	Power
(c) Seismic Qualification       Yes       Note 1         (d) Quality Assurance       Yes       Note 2         (d) Quality Assurance       Yes       Note 2         (e) Redundance Yes       Yes - Sensors are located in reactor core 5 Sensor Location       Yes - Sensors are located in reactor core 5 Sensor Location         (f) Power Supply       IE       IE         (g) Location of Display       Image       Location         Indicator       C51-NI-R600A       10 <sup>-1</sup> / <sub>-1</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       H12-P603 Control Roor         Indicator       C51-NI-R600B       10 <sup>-1</sup> / <sub>-1</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       " " " " " " " " " " " " " " " " " " "	(b)	Environmental Qualification	Үев	Note 1	
(d) Quality Assurance       Yes       Note 2         (e) Redundance δ Sensor Location       Yes       Yes - Sensors are located in reactor core         (f) Power Supply       1E       1E         (g) Location of Display       1E       1E         Micator       C51-NI-R600A       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       H12-P603 Control Roor """""""""""""""""""""""""""""""""""	(c)	Seismic Qualification	Yes	Note 1	
(e)       Redundance & Sensor Location       Yes       Yes - Sensors are located in reactor core         (f)       Power Supply       IE       IE         (g)       Location of Display       IE       IE         (g)       Location of Display       Indicator       C51-NI-R600A       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       H12-P603 Control Roor         Indicator       C51-NI-R600B       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       " " "       " "         Indicator       C51-NI-R600A       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       " " "       " "         Indicator       C51-NI-R600A       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       " " "       " "         Indicator       C51-NI-R600A       10 <sup>-1</sup> / <sub>0</sub> to 10 <sup>6</sup> / <sub>0</sub> counts/sec       " " " "       " " "         Indicator       C51-NI-R601A       -100 to ∞ to +10 period in sec       " " " " "       " " " "         Indicator       C51-NI-R601B       " " " " " " " " " " " " " " " " " " "	(d)	Quality Assurance	Yes	Note 2	
(f)       Power Supply       1E       1E         (g)       Location of Display         Display       Tag No.       Range       Location         Indicator       C51-NI-R600A       10 <sup>-1</sup> to 10 <sup>6</sup> counts/sec       H12-P603 Control Room         Indicator       C51-NI-R600B       10 <sup>-1</sup> to 10 <sup>6</sup> counts/sec       " " " " " " " " " " " " " " " " " " "	(e)	Redundance & Sensor Location	Yes .	Yes - Sensors are located in	reactor core
(g) Location of Display $\frac{\text{Display}}{\text{Display}} \frac{\text{Tag No.}}{\text{Indicator}} \frac{\text{Range}}{\text{C51-NI-R600A}} \frac{10^{-1}}{10} \text{ to } 10^{6} \text{ counts/sec} \\ \text{Indicator} \\ \text{Indicator} \\ \text{C51-NI-R600B} \\ \text{Indicator} \\ \text{C51-NI-R600C} \\ \text{Indicator} \\ \text{C51-NI-R600A} \\ \text{Indicator} \\ \text{C51-NI-R600A} \\ \text{Indicator} \\ \text{C51-NI-R601A} \\ \text{Indicator} \\ \text{C51-NI-R601A} \\ \text{Indicator} \\ \text{C51-NI-R601B} \\ \text{Indicator} \\ \text{C51-NI-R601B} \\ \text{Indicator} \\ \text{C51-NI-R601B} \\ \text{Indicator} \\ \text{C51-NI-R601B} \\ \text{Indicator} \\ \text{Recorder} \\ \text{C51-NI-R601B} \\ \text{Recorder} \\ \text{C51-NI-R602} \\ \text{Recorder} \\ \text{C51-NI-R603A} \\ \text{Indicator} \\ \text{Recorder} \\ \text{C51-NI-R603B} \\ \text{Indicator} \\ \text{Indicator} \\ \text{Recorder} \\ \text{C51-NI-R603B} \\ \text{Indicator} \\ \text{Recorder} \\ \text{C51-NI-R603B} \\ \text{Indicator} \\ \text{Recorder} \\ \text{C51-NI-R603B} \\ \text{Indicator} \\ \text{Indicator} \\ \text{Recorder} \\ \text{C51-NI-R603B} \\ \text{Indicator} \\ \text{Indicator} \\ \text{Indicator} \\ \text{Recorder} \\ \text{C51-NI-R603B} \\ \text{Indicator} \\ \text{Indicator} \\ \text{Indicator} \\ \text{C51-NI-R603B} \\ \text{Indicator} \\ \text{C51-NI-R603B} \\ \text{Indicator} \\ $	(f)	Power Supply	1E	16	
DisplayTag No.RangeLocationIndicator $C51-NI-R600A$ $10^{-1}$ to $10^{6}$ counts/sec $H12-P603$ Control RootIndicator $C51-NI-R600B$ $10^{-1}$ to $10^{6}$ counts/sec"""""""""""""""""""""""""""""""""	(g)	Location of Display			
Indicator       C51-NI-R600A       10 <sup>-1</sup> / <sub>-1</sub> to 10 <sup>6</sup> / <sub>6</sub> counts/sec       H12-P603 Control Room         Indicator       C51-NI-R600B       10 <sup>-1</sup> / <sub>-1</sub> to 10 <sup>6</sup> / <sub>6</sub> counts/sec       """"""""""""""""""""""""""""""""""""		Display	Tag No.	Range	Location
		Indicator Indicator Indicator Indicator Indicator Indicator Indicator Recorder Recorder Recorder Recorder Recorder Recorder Recorder	C51-NI-R600A C51-NI-R600B C51-NI-R600A C51-NI-R601A C51-NI-R601B C51-NI-R601C C51-NI-R602 C51-NI-R603A C51-NI-R603B C51-NI-R603C C51-NI-R603D	10 to 10 counts/sec 10 to 10 counts/sec 10 to 10 counts/sec 10 to 10 counts/sec 10 to 10 counts/sec -100 to ~ to +10 period in sec """"""""""""""""""""""""""""""""""""	
Indicator C51-NI-R604(X)* 0-125% Full Power *There are 16 LPRM's		Indicator *There are 16 LPRM	C51-NI-R604(X)*	0-125% Full Power	

(h) Schedule - There are no anticipated changes to this system.

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#### VARIABLE B2 - CONTROL ROD POSITION

		Recommended by RG 1.97		Prov	ided by Brunswick
(a)	Instrument Range	Full In Full Out		Full	in - Full out
(b)	Environmental Qualification	No		Note	1
(c)	Seismic Qualificatio	on No		Note	1
(d)	Quality Assurance	High Qualit Grade	y Commercial	Note	2
(e)	Power Supply	Non-1E		High	Reliability
(f)	Redundance and Sensor Location	No		No	
	Sensor	Tag Number	Range		Location
	Position Switch	C12-25-XX-XX*	Full in-Full o	out	Control Rod
(g)	Location of Display				
	Display	Tag Number	Range		Location
	Indicator	C12-Z5 ·	Full-In-Full-G	Dut	H12-P603 Control Room
(h)	Schedule: There are	no anticipated change	s to the RPIS (Roo	d Posi	tion Indication System).

\*NOTE: There are 137 Control Rod Drive Position Indicator Probes.

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		Recommended By RG 1.97	Provided by Brunswick
(a)	Instrument Range	0-1000 ppm	Range exceeds RG 1.97 Recommendation
(b)	Environmental Qualification	No specific position	Sampling System will be qualified. Analysis equip- ment is high quality commercial.
(c)	Seismic Qualification	No specific position	Sampling system till be seismically qualified. Analysis equipment has not been qualified.
(d)	Quality Assurance	High Quality Commercial Grade	Sampling System has full QA Program commitment. Analysis equipment is high quality commercial grade.
(e)	Power Supply	Non-1E	1E
(f)	Redundance & Sensor Location	No	Redundant Sample Points Only

#### VARIABLE B3 - RCS SOLUBLE BORON CONCENTRATION (Sample)

RCS Samples are taken from the RHR Heat Exchanger A and B shell sides and from the No. 6 and No. 14 jet pumps.

#### (g) Location of Display

The sample will be analyzed on site in the chemistry lab located in the service building. Back up analysis will be performed by Babcock and Wilcox. Boron concentration is logged by the laboratory technician and phoned in to the ontrol room operator where it is logged by him.

(h) Schedule

TMI modifications 80-028 and 80-029 have provided this Post Accident Sampling Syster.

VARIABLE B4 - COOLANT LEVEL IN REACTOR - RG 1.97 recommendations will be met by Variable A2.

VARIABLE B5 - BWR CORE TEMPERATURE - Not required at this time per NUREG-0737 supplement 1.

VARIABLE B6 - RCS PRESSURE - RG 1.97 recommendations will be met by Variable Al.

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VARIABLE B7 - DRYWELL PRESSURE - RG 1.97 recommendations will be met by Variable A5.

VARIABLE B8 - DRYWELL SUMP LEVEL - Not provided. The Brunswick plant design does not require continuous measurement of drywell sump level. A LOCA signal will prevent operation of the sump pumps and will close containment isolation valves to eliminate the possibility of radioactive materials leaking outside the Primary Containment. During and after a LOCA, the drywell sumps overflow to the suppression pool.

VARIABLE B9 - PRIMARY CONTAINMENT PRESSURE - RG 1.97 recommendations will be met by Variables A5 and A7.

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		Recommended By RG 1.97	Provided By Brunswick
(2)	Instrument Range	Closed - Not Closed	Green indicating light - closed Red indicating light - open
(b)	Environmental Qualification	Yes	Note 1
(c)	Seismic Qualification	Yes	Note 1
(d)	Quality Assurance	Yes	Note 2
(e)	Power Supply	1E	· 1E
(f)	Redundance & Sensor Location	No	No All sensors are located on the primary containment isolation valves.
(g)	Location of Display		All the valves at the Brunswick plant involved in primary

All the values at the Brunswick plant involved in primary containment isolation that are air/solenoid or motor operated are listed below by penetration number. All the panels listed are located in the main control room.

Penetration No.	Valve Tag No.	Location of Display
3B	CAC-V49#	XU-51
3B	CAC-V50#	XU-51
7A	B21-F022A	H12-P601
7B	B21-F022B	н
70	B21-F022C	
70	B21-F022D	
7A	B21-F028A	
7B	B21-F028B	
70	B21-F028C	n II
70	B21-F028D	
8	B21-F016	н к
8	B21-F019	'n n
94	B21-F032A	H12-P603
94	E41-F006	H12-P601
98	B21-F032B	H12-P603
98	E51-F013	H12-P601
98	G31-F042	H12-P603

Penetration No.	Valve Tag No.	Location
10	E51-F007	H12_P601
10	E51-F008	n n
11	E41-F002	
11	E41-F003	
12	E11-F009	
12	E11-F008	
13A	E11-F015A	
13A	E11-F017A	
13B	E11-F015B	
13B	E11-F017B	
14	G31-F0G1	
14	G31-F004	
16A	E21-F005A	
16B	E21-F004A	
16B	E21-F005B	
16B	E21-F004B	
17	E11-F022	
17	E11-F023	
18	G16-F003	
18	G16-F004	10 II
19	G16-F019	
19	G16-F020	
23	RCC-V-52	XU-3
24	RCC-V-28	
25	CAC-V6	XU-51
25	CAC-V15	
25	CAC-V55#	
25	CAC-V56#	
25	CAC-V48#	
25	CAC-V4	
26	CAC-V9	"
26	CAC-V10	
26	CAC-V23	XU-56
35A	TIP-V1	H12-P601
35B	TIP-V2	"
35C	TIP-V3	"
35D	TIP-V4	"
39A	E11-F016A	

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Penetration No.	Valve Tag No.		Location
39A	E11-F021A		H12-P601
39B	E11-F016B		
39B	E11-F021B		
49B	CAC-2V-1200B		XU-2
49B	CAC-PV-1261		
51A	E11-F043C		
51B	E11-F043A		
51C	E11-F037C		
51D	E11-F037A		"
51E (Spared)	B21-PV-1212E		
53A	B21-F049C		
53B	B21-F047C		"
530	B21-F046A		**
53D	B21-F008		"
SJE	B21-F040		
53F	B21-F048A		"
54A	B21-F014B		"
54B	B21-F014A		"
540	B21-F014E		"
54D	B21-F014F		"
54E	CAC-PV-3439	1	"
54E	CAC-PV-1211E		"
54E	CAC-PV-3438		
54E	CAC-PV-3437	123	"
54F	CAC-PV-1262		"
54F	CAC-PV-1211F		
55	RNA-V101		XU-51
56A	B21-F014K		XU-2
56B	B21-F014J		
560	B21-FG14N		
560	B21-F014P		
56F (Snared)	B32-F019		H12-P603
S6P	B32-F020		
56F (Spared)	B21-PV-1210F		XU-2
574	CAC-PV-1209A		
574	CAC-SV-1263-4 *		
57R	CAC-PV-1209B		
57B	CAC-SV-1263-3*		

Penetration No.	Valve Tag No.	Location	
57C (Snared)	B21-PV-1209C	XU-2	
570	CAC-PV-1209D		
57F (Spared)	B21-PV-1209E	"	
57F (Spared)	B21-PV-1209F		
584	B21-F058N		
588	B21-F052C	"	
58C	B21-F058R		
58E	B21-F058T		
58F	B21-F050C		
59A	B21-F050A		
59B	B21-F058C		
590	B21-F058G		
1-59D, 2-58D	L21-F058A		
1-58D, 2-59D	B21-F058L		
59E	B21-F058E		
59F	B21-F052A		
60A (Spared)	B32-F056F		
60B (Spared)	B32-F056C		
60C	E41-F023A		
50D	E41-F023C		
60E	CAC-PV-1205E		
60E	CAC-SV-1263-2 * ,		
60F (Spared)	B21-PV-1205F		
61A	B21-F056		
61B	B21-F054		
61C (Spared)	B32-F056H		
61D (Spared)	B32-F056A		
61E	E51-F043C		
61F	E51-F043A		
62A	B32-V22		
62B	IA-PV-1204B		
62C	IA-PV-1204C		
1-68A, 2-68C	E11-F037D		
1-68C, 2-68A	E1J-F043D		
68B	E11-F043B		
68D	E11-F037B		
68E (Spared)	B21-PV-1229E		
68F (Spared)	B21-PV-1229F		
69A	B21-F042B		

Penetration No.	Valve Tag No.	Location
698	B21-F044B	XU-2
690	B21-F046B	"
690	B21-F048B	н
69E	IA-PV-1217E	"
1-69F. 2-Spared	B21-F049D	"
704	E41-F023D	"
708	E41-F023B	"
700	B32-F056G	"
700	B32-F056B	"
70E (Spared)	B21-PV-1228E	"
70F (Spared)	B21-PV-1228F	н
71	RNA-V103	XU-51
72A	B32-F056E	XU-2
72B	B21-F060	н
72C (Spared)	B21-PV-1226C	11
721.	B32-F056D	"
72E	E51-F043D	
725	E51-F043B	"
734	CAC-PV-1227A	"
734	CAC-SV-1259-4 *	
73B	CAC-PV-1227B	
738	CAC-SV-1259-3*	"
730	CAC-PV-1227C	
1-73C 2-7 E	CAC-SV-1259-2 *	н
1-73E 2-73C	CAC-PV-1260	"
730	E21-F017B	
738	CAC-PV-1227E	
735	B21-PV-1227F	*
764	B21-F058P	
74A 7/AB	B21-F058S	
740	B21-F052D	"
740	B21-F050D	
745	B21-F058M	"
745	B21-F058U	
1.754 2-750	B21-F050B	80
75B	B21-F058H	
750	B21-F058D	
1 750 2 754	B21-F052B	
1-/3D, 2-/3A	DE 1-10360	

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Penetration No.	Valve Tag No.	Location	
75E	B21-F058B	XU-2	
75F	B21-F058F		
76A	B21-F014L		
768	CAC-FV-L225B		
76B	CAC-PV-3440	n	
76B	CAS-PV-3441		
76B	CAC-PV-3442	н	
76C	CAC-PV-1225C	"	
76D	B21-F014S	"	
75E	B21-F014R		
76F	B21-F014M	"	
77A	B21-F014C	"	
77B	RCC-PV-1222B	XU-3	
770	RCC-PV-1222C	"	
770	B21-F014H	xu-2	
77E	B21-F014G		
77F	B21-F014D		
78A	B32-V30 *	H12-P603	
82A (Spared)	IA-PV-1201A	XU-2	
82B	B21-F042A		
82C	E21-F017A		
82D	B21-F044A		
205	CAC-V5	XU-51	
205	CAC-V47 #	"	
205	CAC-V16		
205	CAC-V17		
206A/A	CAC-SV-1218A	XU-2	
206A/C	CAC-PV-1218C		
2064/D	E41-PV-1218D		
2068/8	CAC-PV-1219B		
2068/C	CAC-PV-1219C	• •	
206B/D	E41-PV-1219D	"	
2060/0	CAC-PV-1220C		
2060/0	E41-PV-1220D	"	
2060/0	CAC-PV-1221C	"	
2060/0	E41-FV-1221D		
2098/A	CAC-SV-1213A		
2-209B/B	RXS-SV-4188	XIJ-75	

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# VARIABLE B10 - PRIMARY CONTAINMENT ISOLATION VALVE POSITION (Cont'd)

Penetration No.	Valve Tag No.	Location
2-2098/1	RXS-SV-4189	xu-79
2-209B/D	RXS-SV-4186	XU-75
2-209B/D	RXS-SV-4187	XU-79
2104	E11-F024A	H12-P601
210A	E11-F007A	" "
210A	E11-FC11A	
210B	E11-F024B	
2108	E41-F012	
210B	E51-F019	" "
2108	E11-F007P	
210B	E11-F011B	
211A	E11-F027A	
211A	E11-F028A	
211B	E11-F027B	
211B	E11-F028B	
214	E11-F103B	
214	E11-F103A	N N
216	E51-F066	
216	E51-F062	
218	E41-F079	
218	E41-F075	
220	CAC-V7	XU-2
220	CAC-V8	XU-2
220	CAC-V22	XU-2
223A	E21-F015A	H12-P601
223A	E21-F031A	
223B	E21-F031B	
223B	- E21-F015B	
224	E51-F031	
225A	E11-F020A	
225B	E11-F020B	
226	E41-F042	
227A	E21-F001B	
227B	E21-F001B	
1-231	TD-V4	xu-3
2-231	TD-V22	
241	B32-F039B	XU-2
241B	B32-F058B	
241C	B32-F006B	
241D	B32-F005B	· · · · · · · · · · · · · · · · · · ·

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Penetration No.	Valve Tag No.	Location of Display
241F	B32-F039D	XU-2
1-243A, 2-243D	B32-F0428	
1-243D, 2-243A	B32-F041B	
1-243E, 2-243F	B32-F041A	
1-243F, 2-243E	B32-F042A	
244A	B32-F041C	
244B	CAC-PV-1231B	
244B	CAC-SV-1259-1*	
2440	B32-F042C	
244E	B32-F042D	
244F	B32-F041D	
245A	B32-F039C	
245B	B32-F058A	"
2450	B32-F006A	
245D	B32-F005A	
245F	CAC-PV-1215E	
245F	CAC-SV-1263-1*	
245F	B32-F039A	

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NOTES:	PM 82-297, 288 involve replacement of some reactor instrument penetration (RIP) values.
	All RIP valves are included in the above list.
	Limit switch, flow switch, and position switch qualification for primary containment
	isolation valves is being done by the 79-01B task force.
	*Ind 1 ates the valve has been deleted on U1 by PM 80-032 and will be deleted on U2 by PM 80-033
	during the next outage of sufficient duration to accomplish the work.
	#PM's 80-133, 134 are replacing the air operators and/or the solenoid valves on these
	valves with qualified solenoid valves.

b) Schedule: PM 82-287 (U1) is to be scheduled to be completed during refueling outage #5 and PM 82-288 (U2) by March 1985. PM 80-133 (U1) is scheduled to be completed during refueling outage #4 and PM 80-134 will be scheduled for completion on the next outage of sufficient duration to accomplish the work.

		Recommended by RG 1.97	Provided by Brunswick
(a)	Instrument Range	1/2 Tech Spec. Limit to 100 Times Tech Spec. Limit	Brunswick meet required Range
(b)	Environmental Qualification	Yes	Yes (Sampling System)
(c)	Seismic Qualification	Yes	Yes (Sampling System)
(4)	Quality Assurance	Yes	Yes (Sampling System)
(e)	Power Supply	1E	1E (Sampling System)
(f)	Redundance & Sensor Location	Yes	Yes

VARIABLE C1 - RADIOACTIVITY CONCENTRATION OR RADIATION LEVEL IN CIRCULATING PRIMARY COOLANT

Primary coolant samples are taken from the Reactor Water Cleanup System during normal operation and analyzed at the counting room by an ND 6620 system. During accident situations, Primary Coolant samples are taken by the Post Accident Sampling System located outside the Reactor Building. The sample is analyzed by the ND 6620 system in the counting room. A portable ND 66 is available to do analysis and a mobile station equipped with an ND 6620 is available. The Technical Support Center will also have an ND-66 linked to the ND 6620 in the counting room. Radiation level is logged and the results are phoned in to the Control Room and logged by the Operator.

(g) Location of Display - Counting Room, Mobile Station

(h) Schedule - TMI Plant Modifications 80-028 and 80-029 have provided the POST ACCIDENT SAMPLING SYSTEM for Unit 1 and 2 respectively.

		Recommended by RG 1.97	Provided by Brunswick
(a)	Instrument Range	10 <sup>-5</sup> Ci/gm to 10 Ci/gm or TID-14844 Source Term in Coolant Volume	Brunswick meets required range
(b)	Environmental Qualification	No	Yes (Sampling System)
(c)	Seismic Qualification	No	Yes (Sampling System)
(d)	Quality Assurance	High Quality Commercial Grade	Yes (Sampling System)
(e)	Power Supply	Non-1E	1E (Sampling System)
(f)	Redundance & Sensor Location	No	Yes

#### VARIABLE C2 - ANALYSIS OF PRIMARY COOLANT (GAMMA SPECTRUM)

Primary coolant samples are taken from the Reactor Water Cleanup System during normal operation and analyzed at the Counting Room by an ND 6620 system. During accident situations Primary Coolant samples are taken by the Post Accident Sampling System located outside the Reactor Building. The sample is analyzed by the ND 6620 system in the Counting Room. A portable ND 66 is available to do analysis and a mobile station equipped with an ND 6620 is available. The Technical Support Center will also have an ND-66 linked to the ND 6620 in the counting room. Radiation level is logged and the results are phoned in to the Control Room and logged by the Operator.

(g) Location of Display - Counting Room, Mobile Station

(h) Schedule - TMI Plant Modifications 80-028 and 80-029 have provided the Post Accident Sampling System for Unit 1 and 2, respectively.

Variable C3	-	BWR Core Temperature - Not required at this time per NUREG 0737 Supplement 1.			
Variable C4	-	RCS Pressure - RG 1.97 recommendations will be met by Variable Al.			
Variable C5	-	Primary Contanment Area Radiation - RG 1.97 recommendations will be met by Variable E1. See discussion for Variable E1.			
Variable C6	-	Drywell Drain Sumps Level - Not required. See discussion for Variable B8.			
Variable C7	-	Suppression Pool Water Level - RG 1.97 recommendations will be met by Variable A4.			
Variable C8	-	Drywell Pressure - RG 1.97 recommendations will be met by Variable A5.			
Variable C9	-	RCS Pressure 1.3 1.97 recommendations will be met by Variable Al.			
Variable C10	-	Primary Containment Pressure - RG 1.97 recommendations will be met by Variables A5 & A7.			
Variable Cl1	-	Containment and Drywell Hydrogen Concentration - RG 1.97 recommendations will be met by Variable A8.			
Variable Cl2	-	Containment and Frywell Oxygen Concentration - RG 1.97 recommendations will be met by Variable A8.			
Variable C13	-	Containment Effluent Readioactivity-Noble Gases - RG 1.97 recommendations will be met by Variables E4 and E5.			
Variable C14	-	Radiation Exposure Rate - Not required at this time per NUREG 0737 Supplement 1.			
Variable C15	-	Effluent Radioactivity - RG 1.97 recommendations will be met by Variables £4 and E5.			
		Recommended b	y RG 1.97	Provided by B	runswick
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Instrument Range		0-110% design		0-109.8% (0-1	2,000,000 #/Hr.
Environmental Qualify	lcation	No		Yes	
Seismic Qualification	,	No		Note 1	
Quality Assurance		No		Note 2	
Power Supply		Non-1E		High Reliabil	ity
Redundance & Sensor 1	ocation	No		No	
Sensor	Tag Number		Range		Location
Flow Element	C32-FE-N001A		0 to 6 x 106	/hr	Main FW line 9-18-B-1
Flow Element	C32-FE-N001B		0 to 6 x 106	//hr	Main FW line 8-18-B-1
Flow Transmitter	C32-FT-N002A		0 to 6 x 10° f	//hr	IR-TB-8
Flow Transmitter	-C32-FT-N002	-В	$0 to 6 x 10^{6}$	//hr	IR-TB-8
Location of Display					
Display	Tag Number		Range		Location
Indicator	C32-FI-R604A		0 to 6 x 10 <sup>6</sup>	/hr	H12-P603 Control Room
Indicator	C32-FI-R604B		0 to 6 x 10°	/hr	H12-P603 Control Room
Recorder	C32-FR-R607		0 to 12 x 10°	#/hr	H12-P603 Control Room
	Instrument Range Environmental Qualify Seismic Qualification Quality Assurance Power Supply Redundance & Sensor I Sensor Flow Element Flow Element Flow Transmitter Flow Transmitter Location of Display Display Indicator Recorder	Instrument Range Environmental Qualification Seismic Qualification Quality Assurance Power Supply Redundance & Sensor Location Sensor <u>Tag Number</u> Flow Element C32-FE-N001A Flow Element C32-FE-N001B Flow Transmitter C32-FE-N001B Scation of Display Location of Display <u>Display Tag Number</u> Indicator C32-FI-R604A Indicator C32-FI-R604B C32-FI-R604B	Recommended bInstrument Range0-110% designEnvironmental QualificationNoSeismic QualificationNoQuality AssuranceNoQuality AssuranceNon-1EPower SupplyNon-1ERedundance & Sensor LocationNoSensorTag NumberFlow ElementC32-FE-N001AFlow ElementC32-FE-N001BFlow Transmitter-C32-FT-N002AFlow TransmitterC32-FT-N002AFlow TransmitterC32-FT-N002AIocation of DisplayTag NumberIndicatorC32-FI-R604AIndicatorC32-FI-R604BRecorderC32-FR-R607	Recommended by RC 1.97Instrument Range $0-110\%$ designEnvironmental QualificationNoSeismic QualificationNoQuality AssuranceNoPower SupplyNon-1ERedundance & Sensor LocationNoSensorTag NumberFlow ElementC32-FE-N001AFlow ElementC32-FE-N001BFlow TransmitterC32-FT-N002-JO to 6 x 106Flow Transmitterc32-FT-N002-JO to 6 x 106Flow Transmitterc32-FT-N002-JO to 6 x 106IndicatorC32-FI-R604AO to 6 x 106MargeO to 6 x 106MargeMargeO to 6 x 106MargeO to 6 x 106Marge <t< td=""><td>Recommended by RC J.97Provided by RInstrument Range0-110% design0-109.8% (0-100000000000000000000000000000000000</td></t<>	Recommended by RC J.97Provided by RInstrument Range0-110% design0-109.8% (0-100000000000000000000000000000000000

# VARIABLE D1 - MAIN FEEDWATER FLOW

(h) Schedule - No changes to the instrumentation are required.

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			Recomme	nded by RG 1.97	Provided by Brunswick
(a)	Instrument Range		Top to I	Bottom	0-100%
(b)	Environmental Qual	ification	No		Note 1
(c)	Seismic Qualificat	ion	No		Note 1
(b)	Quality / ssurance		No		Note 2
(e)	Power Supply		Non-1E		High Reliability
(f)	Redundance & Senso	r Location	No		No
	Sensor	Tag Number		Range	Location
	Level Transmitter	CO-LT-3473		0-100%	Local
(g)	Location of Display	y			
	Display	Tag Number		Range	Location
	Indicator Indicator	CO-LI-1160A CO-LI-1160B		0-100% 0-100%	XU-2 Control Room Radwaste Pnl. G16-P00

# VARIABLE D2 - CONDENSATE STORAGE TANK LEVEL

(h) Schedule - No changes are required

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## VARIABLE D3 - Suppression Spray Flow

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Brunswick does not intend to provide this variable. RHR flow can be used to monitor the operation of primary containment related systems. Drywell pressure, drywell temperature, suppression pool pressure and suppression pool temperature give indication that the safety systems are accomplishing their tasks. These variables are provided at Brunswick.

# VARIABLE D4 - DRYWELL PRESSURE

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			Recommended by RG 1.97	Provided by Brunswick
a)	Instrument Range			
	Narrow range		-2.7 to + 3 paig	0 to $+ 2$ asig
	Wide range		0 to 110% design pressure	See Variable A5
b)	Environmental			
	Narrow range		Yes	No
	Wide range		Yes	See Variable A5
c)	Seismic Qualificatio	n		
	Narrow range		No	No
	Wide range		No	See Variable A5
d)	Quality Assurance			
	Narrow range		Yes	Note 2
	Wide range		Yes	See Variable A5
e)	Power Supply			
	Narrow range		Non-1E	Non-1E
	Wide range		Non-1E	See Variable A5
f)	Redundance & Sensor	Location	No	No
	Sensor	Tag Number	Range	Location
	Narrow Range			
	Transmitter	CAC-PT-2685	0 to + 2	Local
	Wide Range - Transmitter	See Variable A5		
g)	Location of Display			
	Display	Tag Number	Range	Location
	Nattrow Range			
	Indicator/Controller	CAC-PIC-2685	0 to $+ 2$ psig	XU-51 Control Room
	Wide Range Display	See Variable A5		
h)	Schedule Brunsy	wick will install a n	ew transmitter and indicator wit	h a -5 to +3 psig range

Unit 1 work will be scheduled for completion during refueling outage #5 and Unit 2 work will be scheduled for completion during refueling outage #6.

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met by variable A4. VARIABLE D6 - Suppression Pool Water Temperature - RG 1.97 recommendations for this variable will be met by Variable A3. VARIABLE D7 - Drywell Atmosphere Temperature - RG 1.97 .ecommendations for this variable will be met by Variable A6. VARIABLE D8 - Drywell Spray Flow - Brunswick does not intend to provide this variable for the same reasons given for variable D3. VARIABLE D9 - MSIV Leakage Control System Pressure - Not Required. This system is not included in

the Brunswick design.

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RG 1.97 recommendations for this variable will be

VARIABLE D5 - Suppression Pool Water Level

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		Recommended by R	1.97	Provided by Brunswick
a)	Instrument Range	Closed - Not Clos	sed	Green Indicating light - Closed Red Indicating light - Open
b)	Environmental Quaiification	Yes		The NDT International flow transmitters used at Brunswick are currently undergoing environ- mental qualification at Wyle Laboratories.
c)	Seismia Qualification	No		Yes
d)	Quality Assurance	Yes		Note 2
e)	Power Supply	Non-1E		High Quality
f)	Redundance & Sensor Locatic.	No		No
	Sensor	Tag Number	Range	Location
	Transmitter	B21-FT-4157	Closed-not close	d VLV F013A
	Transmitter	B21-FT-4158	Closed-not close	d VLV F013B
	Transmitter	B21-FT-4159	Closed-not close	d VLV F013C
	Transmitter	B21-FT-4160	Closed-not close	d VLV F013D
	Transmitter	B21-FT-4161	Closed-not close	d VLV F013E
	Transmitter	B21-FT-4162	Closed-not close	d VLV F013F
	Transmitter	B21-FT-4163	Closed-not close	d VLV F013G
	Transmitter	B21-FT-4164	Closed-not close	d VLV F013H
	Transmitter	B21-FT-4165	Closed-not close	d VLV F013J
	Transmitter	B21-FT-4166	Closed-not close	d VLV F013K
	Transmitter	B21-FT-4167	Closed-not close	d VLV F013L

## VARIABLE D10 - PRIMARY SYSTEM SAFETY RELIEF VALVE POSITION

### VARIABLE D10 - PRIMARY SYSTEM SAFETY RELIEF VALVE POSITION (Continued)

## g) Location of Display

Display	Tag Number	Range	Location	
Indicator light	B21-D51A	Green	H12-P601 Control	Room
Indicator light	B21-D52A	Red	H12-P601 Control	Room
Indicator light	B21-D51B	Green	H12-P601 Control	Room
Indicator light	B21-D52B	Red	H12-P601 Control	Room
Indicator light	B21-D51C	Green	H12-P601 Control	Room
Indicator light	B21-D52C	Red	H12-P601 Control	Room
Indicator light	B21-D51D	Green	H12-P601 Control	Room
Indicator light	B21-D52D	Red	H12-P601 Control	Room
Indicator light	B21-D51E	Green	H12-P601 Control	Room
Indicator light	B21-D52E	 Red	H12-P601 Control	Room
Indicator light	B21-D51F	Green	H12-P601 Control	Room
Indicator light	B21-D52F	Red	H12-P601 Control	Room
Indicator light	B21-D51G	Green	H12-P601 Control	Room
Indicator light	B21-D52G	Red	H12-P601 Control	Room
Indicator light	B21-D51H	Green	H12-P601 Control	Room
Indicator light	B21-D52H	Red	H12-P601 Control	Room
Indicator light	B21-D51J	Green	H12-P601 Control	Room
Indicator light	B21-D52J	Red	H12-P601 Control	Room
Indicator light	B21-D51K	Green	H12-P601 Control	Room
Indicator light	B21-D52K	Red	H12-P601 Control	Room
Indicator light	B21-D51L	Green	H12-P601 Control	Room
Indicator light	B21-D52L	Red	H12-P601 Control	Room

h)

Schedule: Should replacement of the transmitters prove necessary, 79-01B scope will replace them with qualified transmitters on a schedule consistent with IE Bulletin 79-01B and 10CFR 50.49.

# VARIABLE D11 - ISOLATION CONDENSER SYSTEM SHELL-SIDE WATER LEVEL

This variable is not required. This system is not included in the Brunswick design.

# VARIABLE D12 - ISOLATION CONDENSER SYSTEM VALVE POSITION

This variable is not required. This system is not included in the Brunswick design.

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# VARIABLE D13 - RCIC FLOW CONTROL

			Recommen- RG 1.97	ded By	Provided by Brunswick	
(a)	Instrument Range		0 to 110 design f	% low	0 to 110% design flow	
(b)	Environmental Qual	ification	Yes		Note 1	
(c)	Seismic Qualificat	ion	No		Note 1	
(d)	Quality Assurance		Yes		Note 2	
(e)	Power Supply		Non-1E		1E	
(f)	Redundance & Senso Location	r	No		No	
	Sensor	Tag Number		Range	Location	
	Flow Element Flow Transmitter	E51-FE-N001 E51-FT-N003		0-450" Water Col. 0-450" Water Col.	RCIC Pump Discharge line E51-2-4-605	
(g)	Location of Displa	y				
	Display	Tag Number		Range	Location	
	Flow Indicator/ Controller	E51-FIC-R600		0-500 gpm	H12-P601 Control Room	
(h)	Schedule: Tra	nsmitter E51-FT	-N003 w111	be replaced to comp	ly with environmental	

qualification on a schedule consistent with IE Bulletin 79-01B and 10CFR50.49.

		VARIABLE D.	14 - HPCI FLOW	
		Recomment RG 1.97	ded By	Provided By Brunswick
(a)	Instrument Range	0 to 110 design f	% low	0 to 110% design flow
(b)	Environmental Qualifica	tion Yes		No, to be provided by PM 82-263, 264
(c)	Seismic Qualification	No		Note 1
(d)	Quality Assurance	Yea		Note 2
(e)	Power Supply	Non-1E		1E
(f)	Redundance & Sensor Location	No		No
	Sensor	Tag Number	Range	Location
	Flow Element Flow Transmitter	E41-FE-N007 E41-FT-N008	0-5000 gpt 0-5000 gpt	pm HPCI Pump Discharge Line E41-2-14-60 pm H21-P014
(g)	Location of Display			
	Display	Tag Number	Range	Location
	Flow Indicator/ Controller	E41-FIC-R600	0-5000 gpt	pm H12-P601 Control Room

(h) Schedule: There are no changes required for the basic instrument loop. Plant modifications 82-263, and 82-264 are to replace the transmitters to comply with environmental qualification on a schedule consistent with IE Bulletin 79-01B and 10CFR50.49.

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		Recommended by RG 1.97	Provided	by Brunswick
(a)	Instrument Range	0 to 110% design flow	0 to 110% des	ign flow, 0 to 5198 gpm
(b)	Environmental Qualification	n Yes	Note 1	
(c)	Seismic Qualification	No '	Note 1	
(d)	Quality Assurance	Yes	Note 2	
(e)	Power Supply	Non-1E	1E	
(f)	Redundance & Sensor Location	No .	No	
	Sensor Ta	ag Number	Range	Location
	Flow ElementE.Flow ElementE.TransmitterE.TransmitterE.	21-FE-N002A 21-FE-N002B 21-FT-N003A 21-FT-N003B	0-638" water Col.	CS pump line E21-2-12-300 CS pump line E21-6-12-300 H21-P001 Reactor Bldg. H21-P019 Reactor Bldg.
(g)	Location of Display			
	Display Ta	ag Number	Range	Location
	Flow Indicator E: Flow Indicator E:	21-FI-R601A 21-FI-R601B	0-7000 gpm	H12-P601 Control Room
(h)	Schedule: Transmitter	s E21-FT-N003A and E2	1-FT-N003B will be re	placed to comply with

## VARIABLE D15 - CORE SPRAY SYSTEM FLOW

h) Schedule: Transmitters E21-FT-N003A and E21-FT-N003B will be replaced to comply with environmental qualification on a schedule consistent with IE Bulletin 79-01B and 10CFR50.49.

#### VARIABLE D16 - LPCI SYSTEM FLOW

Low pressure coolant injection is a mode of the RHR (Residual Heat Removal) system. Low pressure cooling systems at Brunswick include the Core Spray System and the RHR system. Refer to variables D15 and D19.

#### VARIABLE D17 - SLCS FLOW

Refer to Brunswick Position Faper paragraph 4.4.13.

VARIABLE	D18	-	SLCS	STORAGE	TANK	LEVEL
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		Recommended by RG 1.97	y 1	Provided by Brunswick
(a)	Instrument Range	Bottom to Top		) to 100% (Bottom to Top)
(b)	Environmental Qualificat	ion Yes	1	No, per category 3 designation in Brunswick Position Paper on RG 1.97
(c)	Seismic Qualification	No	1	Note 1
(d)	Quality Assurance	No		Note 2
(e)	Power Supply	Non-1E		lE
(f)	Redundance Sensor Location	No		No
	Sensor	Tag Number	Range	Location
	Level Transmitter	C41-LT-NG01	0-200 in. water	H21-P001 Reactor Bldg.
(g)	Location of Display			
	Display	Tag Number	Range	Location
	Indicator	C41-L1-R601	0-100%	H12-P603 Control Room

(h) Schedule: No changes to the instrument loop are required.

		Recommended by RG 1.97	Provided	by Brunswick
(a)	Instrument Range	0 to 110% design flow	0 to 110% desi	gn flow, 0 to 22,880 gpm
(b)	Environmental Qualificat	tion Yes	Note 1	
(c)	Seismic Qualification	No	Note 1	
(d)	Quality Assurance	Yes	Note 2	
(e)	Power Supply	Non-1E	1E	
(f)	Redundance and Sensor Location	No	No	
	Sensor	Tag Number	Range	Location
	Flow Element Flow Element Flow Transmitter Flow Transmitter	E11-FE-N014A E11-FE-N014B E11-FT-N015A E11-FT-N015B	0-25,000 gpm """"""""""""""""""""""""""""""""""""	Pipe Ell-18-20-300 Reactor Bldg Pipe Ell-21-20-300 Reactor Bldg Rack H21-P018 Reactor Bldg. Rack H21-P021 Reactor Bldg.
(g)	Location of Display			
	Display	Tag Number	Range	Location
	Flow Indicator Flow Indicator	E11-FI-R603A E11-FI-R603B	0-30,000 gpm	H12-P601 Control Room

## VARIABLE D19 - RHR SYSTEM FLOW

(h) Schedule: Transmitters Ell-FT-N015A and Ell-FT-N015B will be replaced to comply with environmental qualification on a schedule consistent with IE Bulletin 79-01B and 10CFR50.49.

		Recommended by RG 1.97		Provided by	Brunswick
(a)	Instrument Range	32° to 350°F		$0 - 600^{\circ}$ F	
(b)	Environmental Qualification	on Yes		Note 1	
(:)	Seismic Qualification	No		Note 1	
(d)	Quality Assurance	Yes		Note 2	
(e)	Power Supply	Non-1E		1E	
(f)	Redundance & Sensor Location	No		No	
	Sensor	Tag Number	Range		Locat'on
	Temperature Element	E11-TE-N027A E11-TE-N027B	0-600 <sup>°</sup> F 0-600 <sup>°</sup> F		Pipe Ell-18-20-300 Reactor Bldg. Pipe Ell-21-20-300 Reactor Bldg.
(g)	Location of Display				
	Display	Tag Number	Range		Location
	Recorder	E41-TR-R605	0-600 <sup>0</sup> F		H12-P614 Control Room

#### VARIABLE D20 - RHR HEAT EXCHANGER OUTLET TEMPERATURE

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(h) Schedule: Temperature elements Ell-TE-N027A and Ell-TE-N027B will be replaced to comply with environmental qual\*fication on a schedule consistent with IE Bulletin 79-01B and 10CFR50.49.

# VARIABLE D21 - COOLING WATER TEMPERATURE TO ESF SYSTEM COMPONENTS

Brunswick does not intend to provide this variable. See Brunswick Position Paper on RG. 1.97 paragraph 4.4.17.

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		Recommended by RG 1.97	Prov	ided by Brunswick	is the i			
(a)	Instrument Range	0 to 110% design flow	O to 150%, O to 12,000 gpm for RHR Service water. There are no flow Indicators on the seal cooling exchangers, RHR pump room cooler, or Core spray fan cooling units.					
(b)	Environmental Qualificat	ion Yes	Note 1					
(c)	Seismic Qualification	No	Note 1					
(d)	Quality Assurance	Yes	Note 2					
(e)	Power Supply	Non-1E	1E for RHR Service Water Flow only.					
(f)	Redundance/Sensor Locati	ion No	No					
	ESF Component	Sensor	Tag Number	Range	Location			
	RHR Heat Exchangers Service Water Flow	Flow Transmitter	E11-FT-N007A E11-FT-N007B	0-800 in. water	H21-P018 Rx. Bldg. H21-P021 Rx. Bldg.			
	Sealing Cooling Exch.	Flow Switch	SW-FEL-834 SW-FSL-835	Low Flow	Pipe SW-135-1-1574 Pipe SW-130-1-1574			
			SW-FSL-836 SW-FSL-825		Pipe SW-130-1-1377 Pipe SW-129-1-1577			
	Fan Cooling Units CS Pump Room "1A"	Pressure Switch	SW-PSL-1174	Low Pressure	Pipe SW-116-2-157/			
	Pump Room "1B"		SW-FSL-1178		Pipe SW-123-6-137			
	RHR Pump Room Coolers 1B, 2A	Not Applicable						

# VARIABLE D22 - COOLING WATER FLOW TO ESF SYSTEM COMPONENTS

#### VARIABLE D22 - Continued

#### (g) Location of Display

ESF Component	Display	Tag Number	Range	Location				
RHR Heat Exchangers Service Water Flow	Indicator "	E11-FI-R602A E11-FI-R602B	0-12,000 gpm	H12-P601 Control Rm.				
Seal Cooling Exchangers								
RHR Pump 1A	Annunciator	UA-A1	Low Flow	H12-P601 Control Rm.				
" 1B		UA-A1	17 11					
" 10		UA-A1	н					
" 1D	" "	UA-A1						
Fan Cooling Units CS								
Pump Rr .m "1A"	Annunciator	UA-5	Low Pressure	XU-3, Control Room				
"18"		UA-5						

RHR Pump Room Coolers 1B, 2A

Not Applicable

(h) Schedule:

Brunswick will provide flow instrumentation for the conventional and nuclear service water header lines SW-100-24-157 and SW-103-30-157 respectively. Work for Unit 1 will be scheduled for completion during refueling outage #5 and work for Unit 2 will be scheduled for completion during outage #6. Transmitters Ell-FT-N007A and Ell-FT-N007B will be replaced to comply with environmental qualification on a schedule consistent with TE Bulletin 79-01B and 10CFR50.49.

		Recommended by RG 1.97	Provided	by Brunswick
(a)	Instrument Range	Top to Bottom	Top to B	ottom, 0 - 100%
(b)	Environmental Qualification	lon No	Note 1	
(c)	Seismic Qualification	No	Note 1	
(d)	Quality Assurance	No	Note 2	
(e)	Power Supply	Non-1E	Conventi	onal Power Supply
(f)	Redundance/Sensor Location	No	No	
	Sensor	Tag Number	Range	Location
	Transmitter	G16-LT-N026	0-190"	Waste Collector Tank A002 Radwaste Bldg
(g)	Location of Display			
	Display	Tag Number	Range	Location
	Recorder - Alarm	G16-LRS-R008	0-100%	P001 Radwaste Control Room

# VARIABLE D23 - HIGH RADIOACTIVITY LIQUID TANK LEVEL

(h) Schedule: No changes are required to the existing instrumentation.

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## VARIABLE D24 - EMERGENCY VENTILATION DAMPER POSITION

		Recommended by . RG 1.97	Provided by Brunswick
(a)	Instrument Range	Open - Closed	Open - Closed
(b)	Environmental Qualifi- cation	Yes	Note 1
(c)	Seismic Qualification	No	Note 1
(d)	Quality Assurance	Yes	Note 2
(e)	Power Supply	Non-1E	1E
(f)	Redundance/Sensor	No	Mo

Location

Sensor	Tag Number	Range	Location
Position Switch	2-VA-ZS-916B	Open-Closed	Emergency Makeup Damper 2L-D-CB Control Bldg.
Position Switch	2-VA-35-916A	Open-Closed	Normal Make-up Damper 2L-D-CB-Control Bldg.
Flow Switch	1-VA-FS-928A	Off-On	Cable Spreading Room Fan 1A-SF-CB Supply Duct- Control Building
Flow Switch	1-VA-FS-928B	Off-On	Cable Spreading Room Exhaust Fan 1A-EF-CB Duct- Control Building
Flow Switch	2-VA-FS-929A	Off-On	Cable Spreading Room Supply Fan 2A-SF-CB Duct- Control Building
Flow Switch	2-VA-FS-929B	Of f-On	Cable Spreading Room Exhaust Fan 2A-EF-CB Duct- Control Building
Flow Switch	2-VA-FS-918A	Off-On	Mechanical Equipment Room Supply Fan 2F-SF- CB Duct - Control Building
Flow Switch	2-VA-FS-918B	Off-On	Mechanical Equipment Room Exhaust Fan 2E-EF-CB Duct - Control Building
Flow Switch	2-VA-FS-915A	Off-On	Emer Recirc Fan 2A-ERF-CB Duct-Control Bldg.
Flow Switch	2-VA-FS-915B	Off-On	Emer Recirc Fan 2B-ERF-CB Duct-Control Bldg.
Position Switch	2-VA-ZS-918B	Open-Closed	Mechanical Equipment Room Exhaust Damper 2T-D-CB-Control Building
Position Switch	2-VA-ZS-918A	Open-Closed	Mechanical Equipment Room Supply Damper 2K-D-CB - Control Building

# VARIABLE D24 - EMERGENCY VENTILATION DAMPER POSITION (Cont'd)

Sensor	Tag Number	Range	Location
Position Switch Position Switch	2-VA-ZS-917 2-VA-ZS-915A 2-VA-ZS-915C 2-VA-ZS-915D 2-VA-ZS-915D 2-VA-ZS-929A 2-VA-ZS-929A 1-VA-ZS-928A 1-VA-ZS-928B LSO-RX-321 LSC-RX-321 LSC-RX-321 LSC-RX-321 LSC-RX-321 LSC-RX-321	Open-Closed Open-Closed Open-Closed Open-Closed Open-Closed Open-Closed Open-Closed Open-Closed Open Closed Open Closed Open Closed Open Closed Open Closed Open Closed Open-Closed Open-Closed Open-Closed	Control Room Exhaust Damper 2H-D-CB - Control Bldg. Emergency Recirc Damper 2A-EAD-CB - Control Building Emergency Recirc Damper 2C-EAD-CB - Control Building Emergency Recirc Damper 2B-EAD-CB - Control Building Emergency Recirc Damper 2D-EAD-CB - Control Building Cable Spreading Room Supply Tan Damper 2B-D-CB-Control Bldg. Cable Spreading Room Exhaust Fan Damper 2E-D-CB-Control Bldg. Cable Spreading Room Exhaust Fan Damper 1B-D-CB-Control Bldg. Cable Spreading Room Exhaust Fan Damper 1B-D-CB-Control Bldg. Cable Spreading Room Exhaust Fan Damper 1A-D-CB-Control Bldg. Reactor Building Supply Isolation Damper 1A Reactor Building Exhaust Isolation Damper 1C Reactor Building Exhaust Isolation Damper 1B Reactor Building Supply Isolation Damper 1B Reactor Building Supply Isolation Damper 1B Reactor Building Exhaust Isolation Damper 1D Reactor Building Exhaust Isolation Damper 1D

# g) Location of Display

Display	Tag Number	Location	Function
Control Switch(a)	2VA-CS-918-1	XU-3 Control Room	Mechanical Equip Room Exhaust Damper
& Light Assembly	2VA-CS-918-1 .	XU-3 Control Room	Mechanical Equipment Room Exhaust 2T-D-CB Closed
	2VA-CS-918-1	XU-3 Control Room	Mechanical Equip Room Exhaust Fan 2E-EF-CB - Running
"	2VA-CS-918-1	XU-3 Control Room	Mechanical Equip Room Exhaust Fan 2E-EF-CB-Off
	2VA-CS-918-1	XU-3 Control Room	Mechanical Equip Room Supply Damper 2K-D-CB Open
	2VA-CS-918-1	XU-3 Control Room	Mechanical Equip Room Supply Damper 2K-D-CB Closed

# VARIABLE D24 - EMERGENCY VENTILATION DAMPER POSITION (Cont'd)

# g) Location of Display

Display	Tag Number	Location	Function
(a)	,		
Control Switch	2-VA-CS-918-1	XU3-Control Room	Mechanical Equip Room Supply Fan 2F-SF-CB Running
& Light Assm.	2-VA-C3-918-1	XU3-Control Room	Mechanical Equip Room Supply Fan 2F-SF-CB Off
"	2-VA-CS-917-1	XU3-Control Room	Control Room Exhaust Damper 2H-D-CB Open
	2-VA-CS-917-1	XU3-Control Room	Control Room Exhaust Damper 2H-D-CB Closed
	2-VA-CS-917-1	XU3-Control Room	Control Room Exhaust Fan 2D-EF-CB Running
н	2-VA-CS-917-1	XU3-Control Room	Control Room Exhaust Fan 2D-EF-CB Off
(b)	,		
	2-VA-CS-915A	XU3-Control Room	Emergency Recirc Fan 2A-ERF-CB Dampers Open
"	"	XU3-Control Room	Emergency Recirc Fan 2A-ERF-CB Dampers Closed
		XU3-Control Room	Emergency Recirc Fan 2A-ERF-CB Running
	н	XU3-Control Room	Emergency Recirc Fan 2A-ERF-CB Standby
11	2-VA-CS-915B	XU3-Control Room	Emergency Recirc Fan 2A-ERF-CB Dampers Open
	2-VA-CS-915B	XU3-Control Room	Emergency Recirc Fan 2B-ERF-CB Dampers Closed
(c)	)		가장 같은 것을 잘 알려서 가지 않는 것을 잘 했다. 것을 알고 있는 것을 했다.
Indicating			
Light Assm.	1VA-ZL-915A	XU3-Control Room	Emergency Recirc Fan 2A-ERF-CB Dampers Open
"	1VA-ZL-915A	XU3-Control Room	Emergency Recirc Fan 2A-ERF-CB Dampers Closed
	1VA-ZL 915B	XU3-Control Room	Emergency Recirc Fan 2B-ERF-CB Dampers Open
**	1VA-2L-915B	XU3-Control Room	Emergency Recirc Fan 2B-ERF-CB Dampers Closed
	1VA-ZL-916A	XU3-Control Room	Emergency Makeup Damper 2J-D-CB Open
	1VA-ZL-916A	XU3-Control Room	Emergency Makeup Damper 2J-D-CB Closed
**	1VA-ZL-916B	XU3-Control Room	Normal Makeup Damper 2L-D-CB Open
	1VA-2L-916B	XU3-Control Room	Normal Makeup Damper 2L-D-CB Closed
(d)	)		
Control Switch	2VA-CS-929-1	XU3-Control Room	U2 Cable Spreading Rm Supply Fan Damper 2B-D-CB-Open
Light Assm.		XU3-Control Room	U2 Cable Spreading Rm Supply Fan Damper 2B-D-CB Closed
		XU3-Control Room	U2 Cable Spreading Rm Exhaust Fan Damper 2B-D-CB Open
F3	"	XU3-Control Room	U2 Cable Spreading Rm Exhaust Fan Damper 2B-D-CB Closed
		XU3-Control Room	U2 Cable Spreading Rm Supply Fan 2A-SF-CB Running
	н	XU3-Control Room	U2 Cable Spreading Rm Supply Fan 2A-SF-CB Off
	"	XU3-Control Room	U2 Cable Spreading Rm Exhaust Fan 2A-EF-CB Running
	"	XU3-Control Room	U2 Cable Spreading Rm Exhaust Fan 2A-EF-CB Off

VARIABLE D24 - EMERGENCY VENTILATION DAMPER POSITION (Cont'd)

# g) Location of Display (Cont'd)

Display		Tag Number	Location	Function
	(b)			
Control	Switch	1VA-CS-928-1	XU3-Control Room	U-1 Cable Spreading Rm Supply Fan Damper 1B-C-DB Open
& Light	Assmbly.	11		U-1 Cable Spreading Rm Supply Fan Damper 1B-C-DB Closed
		н	"	U-1 Cable Spreading Rm Exhaust Fan Damper 1E-D-CB Open
11				U-1 Cable Spreading Rm Exhaust Fan Damper 1E-D-CB Closed
				U-1 Cable Spreading Rm Supply Fan 14-SE-CR Running
		н		U-1 Cable Spreading Rm Supply Fan 1A-SF-CB Off
				U-1 Cable Spreading Rm Exhaust Fan 14-FF-CB Running
		"	"	U-1 Cable Spreading Rm Exhaust Fan 1A-EF-CB Off
		VA-CS-1510		Reactor Building Supply Isolation Damper 1A Open
		11	H.	Reactor Building Supply Isolation Damper 1A Closed
		11		Reactor Building Exhaust Isolation Damper 1C Open
		"	"	Reactor Building Exhaust Isolation Damper 1C Closed
		VA-CS-1512	"	Reactor Building Supply Isolation Damper 1B Open
		н	"	Reactor Building Supply Isolation Damper 1B Closed
		11		Reactor Building Exhaust Isolation Damper 1D Open
		"	"	Reactor Building Exhaust Isolation Damper 1D Closed
		VA-CS-1589		Reactor Building Purge Valve IN-BFV-RB Open-Closed
"		"	"	Reactor Building Purge Valve IN-BFV-RB Open-Closed

h) Schedule: No changes required for this instrumentation.

a) On both Unit 1 and Unit 2 Panel

b) On Unit 2 Panel Only

c) On Unit 1 Panel Only

d) Other Unit has Indication, No Control

		Recommended by RG 1.97	Provided by Brunswick
(a)	Instrument Range	Plant Specific	See Section (g)
(b)	Environmental Qualification	Yes	Note 1
(c)	Seismic Qualification	No	Note 1
(d)	Quality Assurance	Yes	Note 2
(e)	Power Supply	Non-1E	1E
(f)	Redundance	No	No

### VARIABLE D25 - STATUS OF STANDBY POWER AND OTHER ENERGY SOURCES IMPORTANT TO SAFETY (ELECTRIC, HYDRAULIC, PNEUMATIC)

(g) For simplicity and clarity of this report, the instrumentation for each diesel generator is presented by giving voltage indication followed by breaker indication. The same is done for the normal source feeders. These are followed by DC battery voltage instrumentation and instrument air pressure indication.

### VARIABLE D25 - STATUS OF STANDBY POWER AND OTHER ENERGY SOURCES IMPORTANT TO SAFETY (ELECTRIC, HYDRAULIC, PNEUMATIC)

#### Sensor Location (Diesel Generator Voltage)

The sensors for the diesel generator voltages are potential transformers located at the respective diesel generators.

#### Location of Display

Display	Tag Numbers	Range	Location
DG No. 1 Voltmeter	DG-VM-1265	0-5,000 Volts	Panel XU-2 Control Room
DG No. 2 Voltmeter	DG-VM-1272	0-5,000 Volts	Panel XU-2 Control Room
DG No. 3 Voltmeter	DG-VM-1279	0-5,000 Volts	Panel XU-2 Control Room
DG No. 4 Voltmeter	DG-VM-1286	0-5,000 Volts	Panel XJ-2 Control Room

## Sensor Location (Diesel Generator Breakers to Emergency Buses)

Brea	aker	No.					Sei	nsor		Locat	ion			
AE9	(DG	No.	1	to	Bus	E1)	Breaker	Auxiliary	Contact	4160V	SWGR	E1	Compt.	AE9
AG7	(DG	No.	2	to	Bus	E2)	Breaker	Auxiliary	Contact	4160V	SWGR	E2	Compt.	AG7
AI5	(DG	No.	3	to	Bus	E3)	Breaker	Auxiliary	Contact	4160V	SWGR	E3	Compt.	AI5
AK2	(DG	No.	4	to	Bus	E4)	Breaker	Auxiliary	Contact	4160V	SWGR	E4	Compt.	1.K2

#### Location of Display

Breaker No.	Display	Tag Number	Range	Location
AE9	Position Light	EB-CS-950	Green light-open Red light-closed	Panel XU-2, Control Room
AG7	Position Light	EB-CS-957	Green light-open Red light-closed	Panel XU-2, Control Room
A15	Position Light	EB-CS-952	Green light-open Red light-closed	Panel XU-2, Control Room
AK2	Position Light	EB-CS-968	Green light-open Red light-closed	Panel XU-2, Control Room

## Sensor Location (Normal Source Feeder Bus Voltage)

The sensors for the normal source voltage instrumentation are transducers located on the respective buses.

# VARIABLE D25 (Continued)

# Location of Display

Display	Tag Number	Range	Location
Bus B Voltmeter	ED-VM-752	0-5,000V	Panel XU-2, Control Room
Eus C Voltmeter	ED-VM-753	0-5,000V	Panel XU-2, Conrrol Room
Bus D Voltmeter	ED-VM-754	0-5,000V	Panel XU-2, Control Room

# Sensor Location (Normal Source Series Breakers to Emergency Busca)

Breaker No.	Sensor	Location
AE6	Breaker Auxiliary Contact	4160V SWGR E1 Compt. AE6
1-AD1	Breaker Auxiliary Contact	4160V, SWCR 1D Compt. 1-AD1
AG4	Breaker Auxiliary Contact	4160V SWGR E2 Compt. AG4
1-AC8	Breaker Auxiliary Contact	4160V SWGR 1C Compt. 1-AC8
AI2	Breaker Auxiliary Contact	4160V SWGR E3 Compt. AI2
2-AD1	Breaker Auxiliary Contact	4160V SWGR 2D Compt. 2-AD1
AJ9	Breaker Auxiliary Contact	4160V SWGR E4 Compt. AJ9
2-AC8	Breaker Auxiliary Contact	4160V SWGR 2C Compt. 2-AC8

#### VARIABLE D25 (Continued)

#### Location of Display

Breaker No.	Display	Tag Number	Range	Location
AE6	Position Light	ED-2L-951	Green-open/Red-Closed	Panel XU-2, Control Room
1-AD1	Position Light	EP-2L-951	Green-open/Red-Closed	Panel XU-2, Control Room
AG4	Position Light	ED-ZL-958	Green-open/Red-Closed	Panel XU-2, Control Room
1-AC8	Position Light	ED-ZL-958	Green-open/Red-Closed	Panel XU-2, Control Room
AI2	Position Light	ED-ZL-963	Green-open/Red-Closed	Panel XU-2, Control Room
2-AD1	Position Light	ED-ZL-963	Green-open/Red-Closed	Panel XU-2, Control Room
AJ9	Position Light	ED-2L-969	Green-open/Red-Closed	Panel XU-2, Control Room
2-ACE	Position Light	ED-ZL-969	Green-open/Red-Closed	Panel XU-2, Control Room

#### Sensor Location (DC Standby Power)

The sensors for the 125/250V DC bus and 24/48V DC bus are the battery charger output terminals.

#### Location of Display

Display	Tag Number	Range	Location
Voltage Indicator	BAT-VM-737	0-150V	XU-1, Control Room
Voltage Indicator	BAT-VM-738	0-150V	XU-1, Control Room
Voltage Indicator	BAT-VM-739	0-150V	XU-1, Control Room
Voltage Indicator	BAT-VM-740	0-150V	XU-1, Control Room
Voltage Indicator	BAT-VM-741	0-60V	XU-1, Control Poom
Voltage Indicator	BAT-VM-741-1	0-60V	XU-1, Control Room
Voltage Indicator	BAT-VM-742-1	0-60V	XU-1, Control Room

#### Standby Instrument Air Pressure

Currently, there is no control room indication for standby instrument air pressure. IA-PI-3785 and IA-PI-3786 provide local pressure indications. The standby instrument air compressors are presently scheduled to be spared and the containment pump back system will provide pneumatic power to systems in the primary containment. The pump back system being installed by PM 82-008 and PM82-009 will provide for pressure indication in the control room. If the current plans to spare the standby instrument air compressors change, the need for pressure indication will have to be re-evaluated.

h) Schedule: No changes are required for the diesel generator, normal source feeder, or DC battery instrumentation. The instrument air instrumentation will be scheduled for completion during refuel #5 for both units.

### VARIABLE D26 - TURBINE BYPASS VALVE POSITION

		Recommended by RG 1.97	Provided by Brunswick
(a)	Instrument Range	Plant Designer Selected	Green light-closed/Red light-open
(b)	Environmental Qualification	No	Note 1
(c)	Seismic Qualification	No	Note 1
(d)	Quality Assurance	No	Note 2
(e)	Power Supply	Non-IE	High Reliability
(f)	Redundence	No	No

#### Sensor Location

All sensors are position switches located on the ten valves in the Turbine Steam Chest and are listed below by tag number.

MS-ZS-BVCS1	MS-ZS-BVOS1
MS-ZS-BVCS2	MS-ZS-BVOS2
MS-ZS-BVCS3	MS-ZS-BVOS3
MS-ZS-BVOS4	MS-ZS-BVOS4
MS-ZS-BVCS5	MS-ZS-BVOS5
MS-ZS-BVCS6	MS-ZS-BV0S6
MS-ZS-BVCS7	MS-ZS-BVOS7
MS-ZS-BVCS8	MS-ZS-BVOS8
MS-ZS-BVCS9	MS-ZS-BVOS9
MS-ZS-BVCS10	MS-ZS-BVOS10

(g) Location of Display

Display	Tag Number	Range	Location
Position Light	EHC-CS-436	Open/Close	Panel XU-2, Control Room

The indicating lights are part of the EHC (electro hydraulic control) panel insert located on Panel XU-1.

(h) Schedule: No changes required.

NOTE: The instrumentation above is for Unit 2. Unit 1 is similar but has only four bypass valves.

			Recommended by	RG 1.97	Prov	ided by Brunswick
(a)	Instrument Range		Plant Designer	Selected	-24	to +24 inches
(b)	Environmental Qualification		No		Note	1
(c)	Seismic Qualification		No		Note	1
(d)	Quality Assurance		No		Note	2
(e)	Power Supply		Non-IE		High	Peliability
(f)	Redundance		No		No	
	Sensor	Tag Number	<u>.</u>	Range		Location
	Transmitter	CO-LT-2		0-48 inches		Condenser 1A
	Transmitter	CO-LT-3		0-48 inches		Condenser 1A
	Transmitter	CO-LT-4		0-48 inches		Condenser 1B
	Transmitter	CO-LT-5		0-48 inches		Condenser 1B
(g)	Location of Display					
	Display	Tag Number	:	Range		Location
	Level Indicator	CO-LI-2		-24 to +24 inc	hes	Panel XU-2, Control Room
	Level Indicator	CO-LI-3		-24 to +24 inc	hes	Panel XU-2, Control Room
	Level Indicator	CO-LI-4		-24 to +24 inc	hes	Panel XU-2, Control Room
	Level Indicator	CO-LI-5		-24 to +24 inc	hes	Panel XU-2, Control Room

# VARIABLE D27 - CONDENSER HOTWELL LEVEL

(h) <u>Schedule</u>: No changes to the instrumentation are required.

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# VARIABLE D28 - CONDENSER VACUUM

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			Recommended by RG 1:97	Provided by Brunswick
(a)	Instrument Range		Plant Designer Selected	0 to 30 in. Hg Vac
(b)	Environmental Qualification		No	Note 1
(c)	Seismic Qualification		No	Note 1
(d)	Quality Assurance		High Quality Commerciai Grade	Note 2
(e)	Power Supply		Non-1E	High Reliability
(f)	Redundance/Sensor Loc	ation	No	No
	Sensor	Tag Number	Range	Location
	Transmitter	OG-PT-23-1,2	0-30 in. Hg. Vac.	IR-TB-6 Turbine Bldg.
(g)	Location of Display			
	Display	Tag Number	Range	Location
	Pressure Recorder	OG-PR-23	0-30 in. Hg Vac.	XU-2, Control Room
(h)	Schedule: No cha	nges are required	for the above instrumentation.	

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			Recommen	nded by RG	1.97		Provided by Brunswick
(a)	Instrument Range		Plant De	esigner Sel	lected		Green light - off Red light - on
(b)	Environmental Qualification		No				Note 1
(c)	Seismic Qualification		No				Note 1
(d)	Quality Assurance		High Qua	ality Comme	ercial Gr	ade	Note 2
(e)	Power Supply		Non-1E				1E
(f)	Redundance/Sensor Location		No				No
		Sensor			Locati	on	
	Condensate Pump				•		
	A	Breaker	Auxiliary	Contact	4160V	SWCR	D
	В	Breaker	Auxiliary	Contact	4160V	SWGR	с
	С	Breaker	Auxiliary	Contact	4_50V	SWGR	D
	Condensate Booster Pump						
	A	Breaker	Auxiliary	Contact	4160V	SWGR	C
	В	Breaker	Auxiliary	Contact	4160V	SWGR	A
	С	Breaker	Auxiliary	Contact	4160V	SWGR	A

# VARIABLE D29 - CONDENSATE PUMP AND BOOSTER PUMP STATUS

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Breaker Auxiliary Contact

4160V SWGR A

# VARIABLE D29 - CONDENSATE PUMP AND BOOSTER PUMP STATUS (CONT'D)

# (g) Location of Display

Condensate Pump	Display	Tag Number	Location
A	Position Light	CO-CS-305	Panel XU-2, Control Room
В	Position Light	CO-CS-306	Panel XU-2. Control Room
С	Position Light	CO-CS-307	Panel XU-2, Control Room
Condensate Booster Pump			
A	Position Light	COD-CS-311	Panel XU-2, Control Room
В	Position Light	COD-CS-312	Panel XU-2, Control Room
	Doultdon Idaht	COD_CC_313	Panel VII-2 Control Room

(h) Schedule:

No changes required.

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## VARIABLE - E1 PRIMARY CONTAINMENT AREA RADIATION-HIGH RANGE

		Recommended By RG 1.97	Provided by Brunswick		
(a)	Instrument Range	1R/hr to 10 <sup>7</sup> R/hr	1R/hr to 10 <sup>7</sup> R/hr		
(b)	Environmental Qualification	Yes	Note 1		
(c)	Seismic Qualification	Yes	Note 1 Note 2		
(d)	Quality Assurance	Yes			
(e)	Power Supply	1E	1E		
(f)	Redundance & Sensor Location	Yes	Yes		
	Sensor Tag No.	Range	Location		
	Radiation Detector D22-RM-4195 """ D22-RM-4196 """ D22-RM-4197	1 R/hr to 10 <sup>7</sup>	R/hr Drywell AZ 64° E1 30'6"   " Drywell AZ 15° E1 57'7"   " Drywell AZ 239° E1 23'		
	" " D22-RM-4198		Drywell AZ 195° E1 57'7"		

# (g) Location of Display

Display	Tag No.	Range		Location			
Indicator	D22-RI-4195	1 R/hr to	$0 10^7 $ R/hr	XU-75 E1	ectronic	Equip.	Room
Indicator	D22-RI-4196					**	
Recorder	D22-RR-4195	PK 18					
Indicator	D22-RI-4197			XU-79			
Indicator	D22-RI-4198					н	
Recorder	D22-RR-4197					"	

VARIABLE - El (Continued)

(h) Schedule - No changes required.
VARIABLE E2 - Reactor Building or Secondary Containment Area Radiation

High range monitoring of this variable is not required for Brunswick. The Reactor Building vent is closed when the radiation level reaches 5 mr/hr and secondary containment atmosphere is routed through the standby gas treatment system. See Brunswick position paper. VARIABLE E3 - Radiation Exposure Rate (inside buildings of areas where access is required to service equipment important to safety) See Variable Cl4. The Brunswick Plants are not designed to allow servicing equipment following an accident. This variable is not required. VARIABLE E4 - NOBLE GASES AND VENT FLOW RATE

### VARIABLE E5 - PARTICULATE AND HALOGEN

. Drywell Purge, Standby Gas Treatment System Purge.

. Secondary Containment Purge

Not required. Brunswick discharges through the Standby Gas Treatment System and then through common vent (stack).

Not required, on high radiation the reactor vent closes and secondary containment atmosphere is routed through the Standby Gas Treatment System and then through common vent (stack).

Secondary Containment (reactor shield building annulus, if in design)

Not applicable.

. Auxiliary Building

Not applicable.

. Common Plant Vent/Turbine Building Vent

		Recommended by RG 1.97	Provided by Brunswick
(a)	instrument range		
	Stack Flow	0-110% design flow	See Below
	Stack gas	$10^{-6} \mu Ci/cc -10^{4} \mu Ci/cc$	п п
	Stack Particulated Halogen	$10^{-3} \mu C1/cc  -10^2 \mu C1/cc$	н н
	Turbine Bldg Vent flow	0-110% design flow	н н
	Turbine Bldg Vent gas	$10^{-6} \mu C1/cc -10^2 \mu C1/cc$	H. H
	Tarbine Bldg Particulate & Halogen	$10^{-3} - 10^2 \mu \text{Ci/cc}$	
(b)	Environmental Qualification		
	Noble Gas	Yes	See Note 1
	Flow Rate	Yes	See Note 1
	Particulate & Halogen	No	

VARIABLE E4 - NOBLE GASES AND VENT FLOW RATE

### VARIABLE E5 - PARTICULATE AND HALOGEN

. Drywell Purge, Standby Gas Treatment System Purge.

Secondary Containment Purge

Not required. Brunswick discharges through the Standby Gas Treatment System and then through common vent (stack).

Not required, on high radiation the reactor vent closes and secondary containment atmosphere is routed through the Standby Gas Treatment System and then through common vent (stack).

Secondary Containment (reactor shield building annulus, if in design)

Not applicable.

. Auxiliary Building

Not applicable.

. Common Plant Vent/Turbine Building Vent

		Recommended by RG 1.97	Provided by Brunswick
(a)	Instrument range		
	Stack Flow	0-110% design flow	See Below
	Stack gas	10 <sup>-0</sup> µC1/cc -10 <sup>4</sup> µC1/cc	
	Stack Particulated Halogen	10 <sup>-3</sup> MC1/cc -10 <sup>2</sup> MC1/cc	
	Turbine Bldg Vent flow	0-110% design flow	· · · · · · · · · · · · · · · · · · ·
	Turbine Bldg Vent gas	$10^{-6} \mu \text{Ci/cc} - 10^2 \mu \text{Ci/cc}$	
	Turbine Bldg Particulate & Halogen	$10^{-3} - 10^2 \mu \text{Ci/cc}$	
(b)	Environmental Qualification		
	Noble Gas	Yes	See Note 1
	Flow Rate	Yes	See Note 1
	Particulate & Halogen	No	

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# VARIABLE E4, E5

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		Rec RG	commended By 1,97	Provided by Br	unswick
(c)	Seismic Qualificati	on No			
(d)	Quality Assurance	Not	Required	See Note 2	
(e)	Power Supply	Hig	h Reliability	High Reliability	
(f)	Redundance & Sensor	Location No		Partially as s	hown below
	Sensor	Tag No.	Range	Location	Function
	Radiation Detection	D12-K600A	$10^{-1} - 10^{6}$ CPS	Local	Stack monitor
		DIS-KOUUB	10 106 000	Local	Stack monitor
		VA-AQR-3213	10-10 CPS	LOCAL	Turbine vent
		D12-RE-4301	High	1K-1B-31	IB vent Kad Mon
		D12-RE-4302	Mid		
		D12-RE-4303	Low	TD CU 24	OC Stack Rad Mon
		D12-RE-4373	Mid	1K-5n-34	UG SLACK RAG MON
		D12-RE-4974	Lou		
	Flow Transmitter	VA_FT_3358	0-15000 SCEM	Local	Turbing Vont
	Flow Transmitter	VA-FT-3359	0-100,000 SCFM	Local	Plant Stack
(g)	Location of Display				
	Display	Tag No.	Range	Location	Service
	Recorder	D12-RR-R600A	$10^{-1} - 10^{6}$ CPS XU-3	Control Room	Stack
	Recorder	D12-RR-R600B			Stack
	Indicator	VA-AQH-3215-1	10 <sup>1</sup> -10 <sup>0</sup> CPS XU-55	5 " " "	Turbine Vent Particulate
	Indicator	VA-AQH-3215-2			Turb. Vent. Iodine
	Indicator	VA-AQH-3215-3	"", XU-55	5 " "	Turb. Vent Gas
	Recorder	D12-RR-4548-1	10 to 10 uCi/cc XU-7	5 Control Room	TB Vent Rad Mon
	Recorder	D12-RR-4548-2	$10_{-1}^{-4}$ to $10_{5}^{2}$ " "		"
	Recorder	D12-RR-4548-3	10 to 10 " "		"
	Effluent Recorder	D12-RR-4549	10 to 10 uC1/Sec "		"
	Radiation Recorder	D12-RR-4599-1	10_4 to 10_2 uCi/cc XU-79	9 Control Room	OG Stack Rad Mon
	Radiation Recorder	D12-RR-4599-2	10 to 105 " "		
	Radiation Recorder	D12-RR-4599-3	10, to 10 " "		
	Effluent Recorder	D12-RR-4600	10° to 1013 UCi/Sec "		

## VARIABLE E4, E5

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(g) Location of Display (Continued)

Display	Tag No.	Range	Locat	ion		Service
Totalizer	VA-F1Q-3358		XU-62	Control	Room	Turbine Vent
Totalizer	VA-F1Q-3358					Stack
Recorder	VA-FR-3356	0-200000 SCFM	XU-51	Control	Room	Stack
Recorder	VA-FR-3356	0-15000 SCFM	"	"	"	Turbine Vent

(h) Schedule - TMI Plant Modifications 80-034, 80-035 and 80-036 have provided the instrumentation to monitor the stack and turbine building vents.

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VARIABLE E6 - Radiation Exposure Meters (continuous indication at fixed locations)  Not required to be implemented. Refer to NRC Errata dated July 1981 and RG 1.97 Rev. 3.

# VARIABLE E7 - AIRBORNE ! ADIOHALOGENS AND PARTICULATES

(Portable Sampling with onsite analysis capability)

		Recommended by RG 1.97	Provided by Brunswick		
(a)	Instrument Range	10 <sup>-9</sup> Ci/cc to 10 <sup>-3</sup> Ci/cc	10 <sup>-1</sup> 4 Ci/cc to 10 <sup>-2</sup> Ci/cc		
(b)	Environmental Qualification	on No specific provision	No		
(c)	Seismic Qualification	No specific provision	No		
(d)	Quality Assurance	High Quality Commercial Grade	High Quality Commercial Grade		
(e)	Power Supply	No specific provision			
(f)	Redundance & Sensor Location	Not Required	Yes		
	Item	Range Loc	cation		
	ND 66 & ND 6620 ND 6620	10 <sup>-14</sup> Ci/cc to 10 <sup>-2</sup> Ci/cc Cou	unting Room bile Station		
(g)	Location of Display -	Counting Room, Mobile Station. The Technical Support Center will also have an ND-66 linked to the ND 6620 in the counting room.			
(h)	Schedule - No changes	are required.			

### VARIABLE £8 - PLANT AND ENVIRONS RADIATION (PORTABLE INSTRUMENTATION)

			Recommended t RG 1.97		Provided by Brun	nswick		
(a)	Instrument Photons Beta & low	Range energy photons	. 10 <sup>-3</sup> R/hr to	10 <sup>4</sup> R/hr				
(b)	Environment	al Qualification	No specific p	provisions	-			
(c)	Seismic Qua	lification	No specific p	provisions	- 10 200			
(d)	Quality Ass	urance	High Quality Grade	Commercial	High Quality Con Grade	mmercial		
(e)	Power Suppl	у	No specific	provision	Battery Powered			
(f)	Redundance	& Sensor Location	Not Required		Yes - multiple	units pro	vide	d
	Item	Quantity	Range	Measureme	ent	Loca	tion	
	ES-20	50	0  R/hr - 2  R/hr	Photons		Serv	ice	Bld
	E-400	6	0 - 200 mr/hr	Photons				
	Minirad	28	0 - 5  R/hr	Photons		"		
	PIC-6A	30	0 - 1000 R/nr	Photons			"	
	DPM_7	6	$10^{-3}$ R/hr -5 x $10^{-3}$ R/h	r Photons			**	

PRM-/ 2 0 - 20,000 R/hr \*\* Photons, beta & low 11 ... Ro-7 energy photons 28 128 11 0 - 5 R/hrBeta & low energy photons 20 Ro-2 .. ... 10 0 - 1000 R/hr Teletektor 35 Photons \*\* .. .. Beta & low energy photons  $0 - 50 \, R/hr$ Ro-2A 15

(g) Location of Display - Display is integral part of portable instrument.

(h) Schedule - No changes required.

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		RG 1.97	Provided by Brunswick
а,	Instrument Range	Multichannel Gamma Ray Spectrometer	ND-66 Multichannel Gamma Ray Spectrometer
b)	Environmental Qualification	No specific provision	
c)	Seismic Qualification	No specific provision	-
d)	Quality Assurance	High Quality Commercial Grade	High Quality Commercial Grade
e)	Power Supply	No specific provision	
f)	Redundance & Sensor Location	Not Required	Yes
	ND 56 located in Counting Room ND 6620 located in Mobile Lab		

## VARIABLE E9 - Plant and Environs Radioactivity (Portable Instrumentation)

g) Location of Display - Display is integral part of portable instrument.

h) Schedule - No changes are required.

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Variable E10 - Wind Direction Variable E11 - Wind Speed Variable E12 - Estimation of Atmospheric Stability

Recommended by RG 1.97 Provided by Brunswick 0 to  $360^{\circ}$  (±  $5^{\circ}$  accuracy with a deflection of  $15^{\circ}$ ). 0 to  $540^{\circ}$ , + 5.4<sup>°</sup> **Instrument Range E10** Starting speed 0.45 mps (1.0 mph). Damping ratio between 0.4 and 0.6, distance constant <2 meters. E11 0 to 30 mps (67 mph) + 0.22 0 to 125 mph, + .4 mph mps (0.5 mph). Accuracy for wind speeds less than 11 mps (25 mph) with a starting threshold of less than 0.45 mps (1.0 mph). E12 Based on vertical tempera-Differential temperature ture difference from primary System + .186 F over system.-5°C to 10°C (-9°F ambient temperature range to 12°F and + .15°C accurfrom  $-50^{\circ}$ C to  $+30^{\circ}$ F acy per 50 meter intervals (+ .3°F accuracy per 164foot intervals) or analogous range for alternative stability estimates. b) Environmental Qualification No specific provision High Quality Commercial c) Seismic Qualification No specific provision No

Variable E10 (Continued) Variable E11 (Continued) Variable E12 (Continued)

### Recommended by RG 1.97

Provided by Brunswick

High Quality Commercial

d) Quality Assurance

e) Power Supply

High Quality Commercial

No specific provision

Conventional Power Sources

f) Redundance and Sensor Location

Redundancy not required

No redundancy

Sensors are located at the Meteorological Tower

- g) Location of Display Displays are located in an environmentally controlled shelter located near the tower. A computer system polls the meteorological station, and provides print-outs in the control room for operators.
- h) Schedule Brunswick will replace the existing system with new equipment which will fully meet RG 1.97 requirements. The new system is scheduled to go into operation December, 1983.

VARIABLE E13 - Primary Coolant and Sump

(ANALYSIS CAPABILITY ON SITE)

Recommended by RG 1.97

Provided by Brunswick

a) Instrument Range

Gross Activity Gamma Spectrum Boron Content Chloride Content

Dissolved Hydrogen or Total Gas Dissolved Oxygen pH

b) Environmental Qualification

c) Seismic Qualification

d) Quality Assurance

10 uCi/ml to 10 Ci/ml Isotopic Analysis 0 to 1000 ppm 0 to 20 ppm

0 to 2000 cc (STP)/Kg 0 to 20 ppm 1 to 13

No specific provision

No specific provision

High Quality Commercial Grade

1 uCi/ml to 10 uCi/ml Isotopic Analysis 20 to 6000 ppm 0.5 to 20 ppm

< 1 to 100%
< 1 to 30%
1 to 14
</pre>

Sampling System will be qualified. Analysis equipment is high quality commercial.

Sampling system will be seismically qualified. Analysis equipment has not been qualified.

Sampling system has full QA Program commitment. Analysis equipment is high quality commercial grade.

#### VARIABLE E13 (Continued)

Recommended by RG 1.97

Provided by Brunswick

(e) Power Supply

No specific provision

Sampling System will be 1E power. Analysis equipment is powered from conventional sources.

(f) Redundance & Sensor Location Redundancy not required

The Post Accident Sampling System allows samples of primary coolant to be taken from a remote station in the Turbine Building breezeway. Analyzing equipment is located as follows:

Gross Activity and Gamma Spectrum - Counting Room, Mobile Trailer

Chemical Analysis - Chemistry Lab

(f) Location of Display

The chemistry analysis is made in the Chemistry Lab and the results logged. Gross activity and gamma spectrum displays are available in the Counting Room and Mobile Trailer.

(h) Schedule: TMI Plant Modifications 80-028 and 80-029 have provided the Post Accident Sampling System for Unit 1 and 2, respectively.

### VARIABLE E14 - Containment Air

Recommended by RG 1.97

#### Provided by Brunswick

(a) Instrument Range Hydrogen Content Oxygen Content Gamma Spectrum

(b) Environmental Qualification

(c) Seismic Qualification

(d) Quality Assurance

(e) Power Supply

0 to 30% 0 to 30% (Isotopic Analysis)

No specific provision

No specific provision

High Quality Commercial Grade

No specific provision

≤ i to 100%
≤ 1 to 30%
Isotopic Analysis

Sampling system will be environmentally qualified. Analysis equipment is high quality commercial.

Sampling System will be seismically qualified. Analysis equipment has not been qualified.

Brunswick QA program applies to the sampling system. Analysis equipment is high quality commercial grade.

Sampling System will be 1E power. Analysis equipment is powered from conventional sources.

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Variable E14 (Continued)

Recommended by RG 1.97

Provided by Brunswick

(f) Redundance & Sensor Location Redundancy Not Required

The Post Accident Sampling System allows samples of primary coolant to be taken from a remote station in the Turbine Building breezeway. The analysis equipment is located in the Chemistry Lab.

- (g) Location of Display The display is located in the Chemistry Lab and sample results are logged.
- (h) Schedule: TMI Plant Modifications 80-028 and 80-029 have provided the Post Accident Sampling System for Units 1 and 2, respectively.