



Carolina Power & Light Company

SERIAL: NLS-84-307

JUL 06 1984

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-324/LICENSE NO. DPR-62
ADDITIONAL INFORMATION REGARDING REQUEST FOR SCHEDULAR EXTENSION
PURSUANT TO 10 CFR 50.49(g)

Dear Mr. Vassallo:

Carolina Power & Light Company (CP&L) would like to express its appreciation for the opportunity to discuss the installation problems described in the subject request with members of your staff at a meeting in Bethesda, Maryland on June 29, 1984. In the course of the meeting, CP&L was requested to provide additional information regarding equipment which is not presently available as qualified devices for use in Brunswick Steam Electric Plant Unit No. 2 (BSEP-2). Attachment 1 provides the requested information on this equipment.

As stated in the meeting, CP&L is committed to completing, by November 30, 1985, the engineering and procurement necessary to support equipment replacement work needed to bring BSEP-2 into full compliance with 10 CFR 50.49. Carolina Power & Light Company would like to emphasize that nearly identical work on Brunswick Steam Electric Plant Unit No. 1 is planned for completion during an outage commencing in March, 1985 and will provide an opportunity to verify installation engineering and procedures similar to those needed for BSEP-2. This provides added assurance that the required modification engineering packages and procurement will be completed by November 30, 1985 for BSEP-2.

As noted in our letter of April 25, 1984, Carolina Power & Light Company is still considering possible replacement of the recirculation piping on the two Brunswick Units to preclude IGSCC. Should a decision be made to do so, CP&L may request an extension for completion of 10 CFR 50.49 modifications to April, 1986 to avoid a dual-unit outage at Brunswick. Carolina Power & Light Company recognizes that such an extension could only be granted by the Commission pursuant to 10 CFR 50.49(g). Carolina Power & Light Company expects to make a final decision regarding replacement of the recirculation piping by the end of this year.

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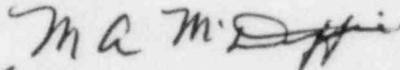
Mr. D. B. Vassallo

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In the interim, CP&L renews its request for an extension of the schedular requirements described in 10CFR50.49(g) until November 30, 1985 as discussed in our April 25, 1984 letter. Since BSEP-2 start-up is scheduled for September 27, 1984, we request that the schedular extension be granted no later than September 1, 1984.

Should you have any questions regarding this subject, please contact Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,


for A. B. Cutter - Vice President
Nuclear Engineering & Licensing

JSD/ccc (320JSD)

Attachment

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

ATTACHMENT 1

PRESSURE SWITCHES

As Originally Installed	Barksdale	- 33
	Static-O-Ring	- 21
	Barton	- <u>6</u>
	Total	60

There are two manufacturers with whom Carolina Power & Light Company (CP&L) has had extensive contact; ASCO and Static-O-Ring. Each claims to have an IEEE-323-1974-qualified switch. The Static-O-Ring switch qualification envelopes the Brunswick Steam Electric Plant (BSEP) requirements; however, the electrical and functional characteristics of the switch do not meet the BSEP specification requirements for accuracy and contact load ratings.

On the other hand, the electrical and functional characteristics of the ASCO switch come closer to meeting the BSEP specification requirements, but the ASCO qualification testing does not envelope the BSEP temperature profile.

Carolina Power & Light Company has been working with both manufacturers to obtain a fully-qualified component for use at BSEP, and is currently awaiting a proposal from ASCO to extend their testing to envelope Brunswick Plant environmental parameters. ASCO has recently stated that they are confident that their pressure switch will be qualifiable to our equipment. ASCO has stated that it would be approximately 22 weeks after receipt of our order until delivery of a qualified switch, including testing.

It is estimated that it will take 8-10 weeks for the inquiry and quote process to result in a firm purchase order to ASCO which gives an expected date for the switches of February, 1985.

TEMPERATURE SWITCHES

As Originally Installed: Barksdale - 4

These items consist of a bulb-type sensor connected to a pressure switch switching module. They will be available from the same manufacturer as the pressure switches when the pressure switches become available. Please see the previous discussion.

FLOW SWITCHES

As Originally Installed: Barton - 6

Carolina Power & Light Company contacted Barton as well as the two pressure switch manufacturers for information relating to flow (differential pressure) switches. At this time, Barton is the only supplier with a fully-developed product line.

The existing Barton Test Report describes a test which envelopes the BSEP environment; however, the setpoint drift and other test anomalies preclude approval of Barton for use at BSEP at this time. Carolina Power & Light Company contacted Barton and ascertained that they had test information which, while not based on so harsh an environment as the above, may still envelope the BSEP requirements and may indicate acceptability of the switches for use at BSEP. Carolina Power & Light Company has recently received that information, and is evaluating its applicability to BSEP. Barton switches would be available 20 weeks after receipt of order.

In addition, should the Barton units not be acceptable for use at BSEP, ASCO has informed us that when their pressure switch becomes qualified, they would be able to offer a qualified differential pressure switch as well.

Based on the above, on-site delivery is expected by February, 1985.

LIMIT SWITCH

As Originally Installed: Honeywell Microswitch - 3

These items are used as valve position indication switches inside the primary containment. The original equipment manufacturer (OEM), Honeywell, does not sell a switch that is fully qualified to this environment at BSEP.

There is a manufacturer which can provide a switch environmentally qualified to BSEP requirements. However, the amount of force input required to throw this switch is much greater than that necessary for Honeywell.

Therefore, CP&L is following two parallel courses of action:

- Continuing to search for a qualified replacement switch or component switching mechanism equivalent to the installed equipment.
- Verifying with the valve manufacturer that his valve develops enough force to use the qualified switch without affecting valve operation. This information should be available by early September, which would enable us to have replacements onsite by the end of 1984.

LEVEL SWITCH

As Originally Installed: Robertshaw - 2

The Robertshaw switch is a float-type level switch. There is insufficient data to fully qualify these switches.

The component at risk in these switches is also the switching mechanism (contact block). Carolina Power & Light Company has ascertained that Robertshaw does not provide a qualified switch. Additionally, we have investigated another manufacturer's qualified level indication system and found it to require extensive physical modification to plant systems to enable its use at BSEP.

Carolina Power & Light Company is involved in testing which is expected to provide a qualified switching mechanism. This testing should be complete by October, 1984 which would enable us to have the components onsite by the end of 1984.

CONTROL SWITCH

As Originally Installed: Sentry - 2

The installed switches are small panel-mounted pushbutton switches for which CP&L has been unable to find a qualified switch equivalent.

While there are manufacturers that advertise a qualified control switch, these switches are so physically large as to require extensive modification of the panel to accommodate them.

Carolina Power & Light Company is involved in testing which is expected to produce a qualified contact block that could be installed in these switches. This testing should be complete by October, 1984, which would enable us to have the components onsite by the end of 1984.

CONNECTORS

As Originally Installed: Pyle National - 2

These connectors have no qualification data and no qualified replacement is available from the OEM.

Recently, several manufacturers; among them NAMCO, Patel Engineers, and Litton-Veam; have claimed to be able to provide a qualified plug/receptacle connector. The Patel-supplied connector is undergoing development and testing which should be completed by December, 1984, with 8-10 weeks delivery after receipt of order. NAMCO and Litton-Veam promise delivery within 12 weeks after receipt of order on their currently available connectors. Carolina Power & Light Company is presently evaluating these units to see if any of them meet our requirements.