

**Carolina Power & Light Company** 

SERIAL: NLS-84-062

Rec'd w/esteve # 4, 400

JUN 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 NOS. 1 AND 2 DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62 REQUEST FOR LICENSE AMENDMENT CLARIFICATION OF OPERATIONAL CONDITIONS

# Dear Mr. Vassallo:

### SUMMARY

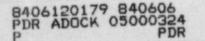
In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2. The proposed revision clarifies the definitions pertaining to Operational Conditions.

#### DISCUSSION

The requested TS change revises Table 1.2 of the Brunswick-1 and Brunswick-2 TS. Various footnotes, corresponding to those provided in the GE/BWR-4 Standard Technical Specifications (STS), are added to more clearly define the Operational Conditions and the allowed use of the Reactor Mode Switch.

### SIGNIFICANT HAZARDS ANALYSIS

The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards considerations by providing certain examples published in the <u>Federal Register</u> on April 6, 1983 (48 FR 14864). One of the examples of an amendment likely to involve no significant hazards consideration relates to a change (vi) which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. Footnotes added in this revision allow for temporary placement of the Reactor Mode Switch (RMS) in the Run or Startup/Hot Standby positions to test the switch interlock function or placement of the RMS in the refuel position when work on



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a single control rod is being performed. In each instance, measures required to ensure safety which are consistent with guidance provided in the GE/BWR-4 STS are included. Therefore, there is no significant increase in the probability or consequence of a previously analyzed accident nor a significant reduction in safety margin as a result of this revision. All other footnotes are administrative in nature (example i), in that a more precise definition of the refueling operational conditions is provided and the footnote format is changed. After review of this request, CP&L has determined that it falls under the criteria of examples (i) and (vi) and as such involves no significant hazards consideration.

# ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 and Brunswick-2 TS pages are provided in Enclosure 1 and Enclosure 2 respectively. Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10 CFR 170.22 and has determined that a Class III and a Class I license amendment fee are required. A check for \$4,400.00 is enclosed in payment of these fees.

Should you have any questions concerning this submittal, please contact Mr. Sherwood R. Zimmerman at (919) 836-6242.

Yours very truly,

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

MAT/ccc (9479NLU) Enclosures

cc: Mr. Dayne H. Brown Radiation Protection Branch Division of Facility Services Department of Human Resources

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

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

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My commission expires: 5/18/88