



SERIAL: NLS-84-092

Carolina Power & Light Company

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
REQUIREMENTS FOR TRIPPING AN INOPERABLE
CHANNEL IN THE RPS/ISOLATION SYSTEM

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 to TS 3.3.1 and 3.3.2 allows alternate actions to be taken rather than placing an inoperative channel of the Reactor Protection System (RPS) or Isolation System in the tripped condition when this would cause the Trip Function to occur.

DISCUSSION

The requested TS change adds footnotes to TS 3.3.1 (Actions a and b) and TS 3.3.2 (Actions b and c). These footnotes defer placement of an inoperative channel in the tripped condition when this would cause the trip function to occur. Instead, the appropriate ACTION required by Table 3.3.1-1 or Table 3.3.2-1 is initiated. This allows the safety of the plant to be maintained without subjecting it to an abnormal operating condition. Additional administrative changes in these sections make them more closely conform to the GE/BWR-4 Standard Technical Specifications (STS). Also, a footnote providing for a one-time extension to Surveillance Requirement 4.3.2.3 is removed from the Brunswick-1 TS.

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 consideration by providing certain examples published in the Federal Register 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. The intent of TS 3.3.1 and TS 3.3.2 is to insure that the trip system with the inoperable channel be "armed" so that a subsequent trip signal would cause the Trip

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D. B. Vassallo

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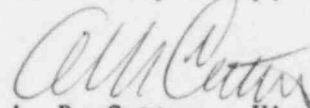
Function to occur or to assure that plant operation is promptly taken to such a mode that the Trip Function is no longer required. The proposed revision allows the intent of TS 3.3.1 and TS 3.3.2 to be met without subjecting the plant to an abnormal operating condition. This revision causes no significant increase in the probability or consequence of a previously analyzed accident nor a significant reduction in safety margin and is consistent with guidance provided in the GE/BWR-4 STS. All other changes are administrative in nature. Therefore, CP&L has determined that this revision falls under the criteria of examples (vi) and (i) and as such involves no significant hazards consideration.

ADMINISTRATIVE INFORMATION

The proposed Brunswick 15 pages are provided in Enclosure 1 and Enclosure 2. Carolina Power & Light Company has evaluated this request in accordance with the provision of 10 CFR 172.22 and has determined that a Class III and 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,



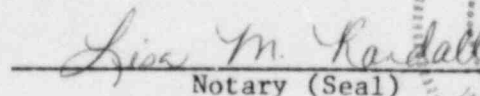
A. B. Cutter - Vice President
Nuclear Engineering & Licensing

MAT/pgp (9575MAT)
Enclosures

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

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

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.


Notary (Seal)

My commission expires: 5/18/88

