

Carolina Power & Light Company

SERIAL: NLS-84-282

JUN 2 0 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 EXCESS FLOW CHECK VALVE SURVEILLANCE INTERVAL EXTENSION

Dear Mr. Vassallo:

SUMMARY

By letter dated May 10, 1984 (Serial No. NLS-84-206), Carolina Power & Light Company (CP&L) requested a one-time only deferral of surveillance involving full-stroke cycling of four reactor instrumentation system isolation valves until the outage scheduled to begin no later than November 2, 1984. Carolina Power & Light Company offers the following additional information concerning our determination that this proposed operating license amendment request does not involve a significant hazerds consideration.

DISCUSSION

Carolina Power & Light Company reviewed the proposed amendment relative to the three criteria in 10 CFR 50.92(c). We determined that the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from any accident previously evaluated, and does not involve a significant reduction in a margin of safety. Our determination with respect to the above is based partly on the following:

The purpose of the EFCVs is to provide a means of isolating an instrument line in the event of a line failure downstream of the EFCV; therefore, the EFCVs involved are only required to function in the unlikely event of such an instrument line failure. In our previous submittal, we cited as one reason for our no significant hazards consideration (NSHC) determination "the high level of confidence in the instrument lines involved." Carolina Power & Light Company's high level of confidence is based in part on the fact that the instrument lines involved are seismically qualified and that the lines were



CONTRACTOR OF STREET, ST

411 Fayetteville Street . P. O. Box 155 . Raleigh, N. C. 27602

A STATE OF A DESCRIPTION OF A DESCRIPTIO

Mr. D. B. Vassallo

tested during a reactor pressure vessel hydrostatic test on June 1, 1983. Extending the surveillance interval from 687 days to 762 days represents only a 10.9 percent increase in the maximum surveillance frequency permitted and thus does not significantly affect the level of assurance that the valves are capable of performing their intended function. The excess flow check valves involved will continue to be available, <u>if called upon</u>, to perform their reactor coolant system isolation function if an accident involving the failure of a reactor instrumentation line were to occur during the interim period. Thus the margin of safety provided is not significantly reduced.

If you have any questions concerning this information, please contact Mr. J. S. Dietrich at (919) 836-6154.

Yours very truly,

R. Zimmerman

Manager Nuclear Licensing Section

WRM/ccc (277WRM)

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