

SERIAL: NLS-84-269

JUN 29 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
REQUEST FOR LICENSE AMENDMENT
SUPPRESSION POOL TEMPERATURE MONITORING 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, Unit No 2. The proposed revisions to TS Tables 3.3.5.3-1 and 4.3.5.3-1 (Accident Monitoring Instrumentation) and Section 3/4.6.2.1 (Suppression Chamber) incorporate the inclusion of a suppression poo' temperature monitoring system (SPTMS) to meet the acceptance criteria of NUREG-0661, Appendix A. In addition, TS Sections 3/4.6.2.1 and 3/4.6.4.1 (Drywell-Suppression Chamber Vacuum Breakers) have been modified to more closely conform to the guidance of the GE/BWR-4 Standard Technical Specifications (STS).

DISCUSSION

The requested TS change reflects the new suppression pool temperature monitoring system being installed on Brunswick-2 during the current refueling outage. This system consists of 24 Class IE resistance temperature detectors (RTDs) installed about the torus at designated locations to provide accurate measurement of the average pool water temperature. These new RTDs are split into two totally independent channels consisting of 12 RTDs per channel. All new RTDs are Class IE qualified, seismically analyzed, and the two suppression pool temperature monitoring divisions meet the acceptance criteria of Regulatory Guide 1.97, NUREG-0661, and NUREG-0783. The new suppression pool temperature monitoring system also serves as the accident monitoring instrumentation for suppression chamber water temperature. Tables 3.3.5.3-1 and 4.3.5.3-1 have been changed to reflect the new instrument numbers. In addition, a footnote has been added in Table 3.3.5.3-1 to ensure that the dual function of the system is apparent to operations personnel.

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The submittal of these changes has provided this opportunity to reformat TS Section 3/4.6.2 in order to make the section more closely conform to the format of the GE/BWR-4 STS. A Limiting Condition for Operation (LCO) and new action items have been added to ensure appropriate requirements exist for various plant conditions. The LCO and Surveillance Requirements pertaining to suppression chamber leakage have been moved from Section 3/4.6.4 to Section 3/4.6.2, consistent with guidance of the GE/BWR-4 STS. Detailed descriptions of all changes are provided in the summary list of revisions included with the proposed TS pages.

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 Federal Register on April 6, 1983 (48 FR 14864). Examples of an amendment likely to involve no significant hazards consideration include: (i) a purely administrative change; and (ii) a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications. The new suppression pool temperature monitoring system/accident monitoring instrumentation is subject to LCOs, actions, and surveillances, specified in Section 3/4.6.2 during normal operation, which were not previously required and, therefore, constitute additional limitations. The reformatting of Sections 3/4.6.2 and 3/4.6.4 and the changing of instrument numbers in Tables 3.3.5.3-1 and 4.3.5.3-1 represent administrative changes. Since the proposed amendment involves only the addition of new limiting conditions for operation and various administrative changes, it results in no significant relaxation of: (1) the criteria used to establish safety limits; (2) the bases for limiting safety system settings or limiting conditions for operation; or (3) the limiting conditions for operation. Therefore, CP&L has determined that the proposed amendment falls under the criteria of Examples (i) and (ii) and, as such, involves no significant hazards consideration.

ADMINISTRATIVE INFORMATION

The proposed Brunswick-2 TS pages are included in Enclosure 1 along with a complete summary of the changes made to each page. We wish to note that the enclosed TS pages relating to accident monitoring instrumentation are based on revised pages previously provided in our submittal of March 2, 1984 concerning Generic Letter 83-36 Technical Specifications.

Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10 CFR 170.12 and has determined that an application fee is required at this time. A check for \$150 is enclosed in payment of this fee.

Since these modifications are being made during the current Brunswick-2 refueling outage, issuance of this amendment is required by September 25, 1984

to support start-up. 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/gvc (254MAT)

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.

My commission expires:

Frankling Munay
Notary (Seal MUNA)
NOTARY

COUNTY, N.