



Carolina Power & Light Company

SERIAL: NLS-84-416

OCT 02 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
RADIOACTIVE GASEOUS EFFLUENT INSTRUMENTATION

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 Nos. 1 and 2. The proposed change revises Table 4.3.5.9-1 to remove the requirement for control room alarm annunciation when the noble gas activity monitors of the main stack monitoring system, the reactor building ventilation monitoring system, or the turbine building ventilation monitoring system experience a high-voltage circuit failure. In addition, the requirement for control room alarm annunciation is removed for the condition when the noble gas activity monitor of the reactor building ventilation system is not set in the "operate mode." These changes reflect the actual design features of the monitors.

DISCUSSION

Although control room alarm annunciation for high-voltage low circuit failure does not exist for these systems, adequate means are available and are currently being employed to ensure operability of the monitors. The reactor building ventilation monitoring system is equipped with monitors manufactured by Nuclear Measurements Corporation (NMC). The design of the NMC monitors does not provide an alarm function for high-voltage low conditions. If such a condition were to exist, the affected monitor would indicate a significant reduction in the count rate. Such a reduction would be obvious to personnel performing the required once per shift channel functional test and to personnel who verify instrument operability on a weekly basis. A complete loss of high voltage will cause a sufficient loss of counts to initiate a

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downscale/inoperative annunciation. In addition, the NMC monitors are not equipped with an operate mode switch that is capable of providing annunciation. However, as mentioned above, the channel checks which are performed once per shift ensure timely verification of the monitors' operability. There are also administrative controls which require independent verification of instrument operability prior to returning a monitor to service following repair or routine maintenance.

General Atomic Wide Range Gas Monitors are used for the main stack monitoring system and the turbine building ventilation monitoring system. These monitors do not provide an alarm function for high-voltage low conditions. However, two built-in self test functions (a loss of counts test and a check source test) provide indirect monitoring of high-voltage performance. A complete high-voltage failure will result in a loss of counts which will trigger the downscale/inoperative annunciation. Decreasing high-voltage will result in failure of the check source test which also generates downscale/inoperative annunciation. These tests are performed automatically at five minute and 24 hour intervals, respectively, and ensure proper high-voltage operation.

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 Federal Register on April 6, 1983 (48 FR 14870). An example of an amendment likely to involve no significant hazards consideration is a change 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 acceptable criteria. Carolina Power & Light Company believes that the proposed amendment falls under the criteria of the Commission's example (vi). While a slight decrease of a safety margin may occur as a result of this change, adequate administrative controls and instrument functions already exist to ensure monitor operability. The proposed amendment: (1) involves no significant increase in the probability of an accident previously evaluated; (2) does not create the possibility of a new or different kind of accident from any accident previously evaluated; and (3) involves no significant reduction in a margin of safety. Therefore, CP&L believes the proposed amendment does not involve a significant hazards consideration.

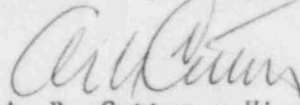
ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 and Brunswick-2 TS pages are included in Attachment 1 and Attachment 2. A complete summary of the changes made to each TS page is included to assist in reviewing this amendment.

Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10 CFR 170.12 and has determined that a license amendment application fee is required. A check for \$150.00 is enclosed in payment of this fee.

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

Yours v ry truly,



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

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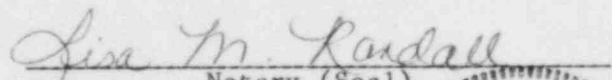
Attachments

cc: Mr. D. O. Myers (NRC-BNP)
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: 5/1/88


Notary (Seal)

