

September 28, 1984

Docket No. 50-324

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Mr. E. E. Utley
Executive Vice President
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

Dear Mr. Utley:

SUBJECT: ENVIRONMENTAL QUALIFICATION OF ELECTRICAL EQUIPMENT
IMPORTANT TO SAFETY - EXTENSION TO SCHEDULAR
REQUIREMENTS OF SECTION 50.49(g) OF 10 CFR PART 50

Re: Brunswick Steam Electric Plant, Unit 2

This letter responds to your submittal dated April 25, 1984, as supplemented on July 6, August 30, and September 26, 1984 (NLS-84-423 and NLS-84-425), in which you requested an extension of the deadline for final environmental qualification of electrical equipment within the scope of 10 CFR 50.49.

Section 50.49(g) of 10 CFR requires that each holder of an operating license issued prior to February 22, 1983, shall by May 20, 1983, identify the electrical equipment important to safety within the scope of this section already qualified and submit a schedule for either the qualification to the provisions of this section or for the replacement of the remaining electrical equipment important to safety within the scope of this section. This schedule must establish a goal of final environmental qualification of the electrical equipment within the scope of this section by the end of the second refueling outage after March 31, 1982, or by March 31, 1985, whichever is earlier. The rule also provides that the Director of the Office of Nuclear Reactor Regulation may grant requests for extensions of this deadline to a date no later than November 30, 1985, for specific pieces of equipment if these requests are filed on a timely basis and demonstrate good cause for such an extension, such as procurement lead time, task complications and installation problems. In addition, 10 CFR 50.49(g) provides that each licensee shall notify the Commission of any significant equipment problem that may require extension of the completion date provided in paragraph (g) of this section within sixty days of its discovery.

In compliance with 10 CFR 50.49(g), by letter dated May 20, 1983, the Carolina Power & Light Company (CP&L) identified electrical equipment important to safety already qualified and submitted a schedule for either the qualification or for the replacement of the remaining electrical equipment important to safety within the scope of this section. The

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schedule established a goal of final environmental qualification by the end of the second refueling outage after March 31, 1982.

On March 23, 1984 CP&L submitted a letter which summarized the results of a February 2, 1984 meeting with the NRC staff. The response also confirmed the need for an extension for the Unit 2 schedule as discussed with the staff at the February 2nd meeting.

On April 25, 1984 CP&L filed a timely request for an extension to the scheduler requirements of 10 CFR 50.49(g) to complete the environmental qualifications of certain equipment that cannot be completed by the end of the current refueling outage. The current outage, which started March 12, 1984 and is scheduled to end in September 1984, is the second outage after March 31, 1982. CP&L requested that the deadline for completion of the implementation of the rule for Unit 2 be extended to November 30, 1985. Attachments 1 and 2, of the April 25, 1984 letter, give a detailed accounting of the outage schedule changes, replacement items deferred because qualified replacement are not available and replacement parts deferred by schedule constraints. Justification for continued operation (JCO) for each piece of equipment is included in attachment 2 to the April 25, 1984 submittal.

On July 6, 1984 a submittal was made providing supplemental information. The submittal also provided assurance that the environmental qualification modification work could indeed be completed according to the extended schedule. The two Brunswick units are identical and Unit 1 environmental qualification modifications will be completed during the refueling outage commencing in March 1985. The required engineering packages and procurement will be completed for Unit 1 early in 1985 in time to accomplish the modifications before restart of Unit 1. This provides added assurance that CP&L will be prepared to complete the modifications for Unit 2 by November 1985 at which time a special outage is scheduled for this purpose.

On August 30, 1984 a submittal was made to supplement the April 25, 1984 request to add items for which the extension of time is needed. The August 30 submittal also provided an updated list of replacement items which has corrections to account for clarifications and omissions in the April 25 submittal. Justification for continued operation for each piece of equipment is referenced.

On September 26, 1984 CP&L submitted additional information in MLS-84-423. The letter responded to the NRC request for additional information dated September 19, 1984. The additional information included data with respect to the length of time it would take to complete the installation of the Unit 2 equipment already qualified and available, the length of time to complete the same installation if certain equipment with longer delay times were omitted and the feasibility of installing the equipment during operation. The licensee concludes that an unplanned partial completion of

work on Unit 2 would prevent the use of the same resources on Unit 1 and therefore would likely prolong the times needed to bring Unit 1 into compliance with 10 CFR Part 50.49. The licensee further concludes that it is more prudent to plan to do the modification while in a scheduled outage.

On September 26, 1984 CP&L also submitted additional information in letter NLS-84-425. The letter responded to NRC requests based on telephone discussions and a clarifying meeting with the staff on September 20, 1984. In particular the staff requested further information regarding the JCOs for Unit 2 equipment which had not been installed during the outage currently about to end. The information was needed to permit the staff to determine the acceptability of the JCOs. The staff provided guidance and criteria for the additional information as indicated in the meeting summary dated September 26, 1984. Letter NLS-84-425 provided the requested additional information regarding the JCOs. The staff has reviewed this information and finds the JCOs acceptable.

We have reviewed the April 25, 1984 submittal, as supplemented on July 6, August 30, and September 26, 1984, and conclude that the request for extension is timely and within the scope of 10 CFR 50.49(h) and that CP&L has shown good cause for the extension stemming from the difficulties encountered in obtaining qualified replacement parts and meeting the requirements of conflicting scheduling problems. We find that extending the implementation date until November 30, 1985 is acceptable and that operation until that time will not adversely affect the public health and safety. However, the staff would oppose any request for further extension of time you may seek from the Commission.

The request for extension of deadline is hereby granted.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this extension will have no significant impact on the environment (49 FR 37681).

Sincerely,

Original Signed by
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

cc: See next page

*Please see previous concurrence pages.

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Brunswick Steam Electric Plant, Units 1 and 2

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