



Carolina Power & Light Company
P.O. Box 10429
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NOV 30 1995

SERIAL: BSEP 95-0513

U. S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI
REQUEST FOR APPROVAL TO USE CODE CASE N-532

Gentlemen:

In accordance with 10 CFR 50.55a(a)(3), Carolina Power & Light (CP&L) Company requests approval for the Brunswick Steam Electric Plant, Units 1 and 2 to use an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code requirements for preparation and submittal of the inservice summary report, Form NIS-1, and Form NIS-2. The requested alternative is delineated in ASME Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000 Section XI, Division 1" which was approved by the ASME on December 12, 1994. Code Case N-532 has not yet been incorporated into Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1." The basis for this request is provided in Enclosure 1. A list of the regulatory commitments contained in this letter is provided in Enclosure 2.

Carolina Power & Light Company considers this request to use ASME Code Case N-532 to be a regulatory burden reduction item for the Brunswick Plant with anticipated savings in excess of \$50,000 for the remaining period of operation currently authorized by the operating licenses. Approval of ASME Code Case N-532 for use at the Brunswick Plant is requested by March 15, 1996 in order to preclude preparation and submittal of Form NIS-1 and Form NIS-2 following the Unit 2 Reload 11 (B212R1) outage.

Please refer any questions regarding this submittal to Mr. George Honma at (910) 457-2741.

Sincerely,

G. D. Hicks
Manager — Regulatory Affairs
Brunswick Nuclear Plant

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Enclosures

1. Basis For Request
2. List of Regulatory Commitments

cc: Mr. S. D. Ebnetter, Regional Administrator, Region II
Mr. D. C. Trimble, Jr. NRR Project Manager - Brunswick Units 1 and 2
Mr. C. A. Patterson, NRC Senior Resident Inspector - Brunswick Units 1 and 2
The Honorable H. Wells, Chairman - North Carolina Utilities Commission
Mr. Billy Walker, Assistant Director - Boiler and Pressure Vessel Division

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI
REQUEST FOR APPROVAL TO USE CODE CASE N-532

In accordance with 10 CFR 50.55a(a)(3), Carolina Power & Light (CP&L) Company requests approval for the Brunswick Steam Electric Plant, Units 1 and 2 to use an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code requirements for preparation and submittal of the Inservice Summary Report (Form NIS-1) and Form NIS-2. The requested alternative is delineated in ASME Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000 Section XI, Division 1" which was approved by the ASME on December 12, 1994. Code Case N-532 has not yet been incorporated into Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1."

The Code Case allows alternative requirements for the certification of repairs and/or replacements provided that:

1. The Owner's Repair/Replacement Program identifies the use of this Code Case.
2. A Repair/Replacement Plan shall be prepared in accordance with IWA-4140 of the 1992 Edition of the ASME Code, Section XI and shall be given a unique identification number.
3. Upon completion of all required activities associated with the Repair/Replacement Plan, the owner shall prepare a Repair/Replacement Certification Record, Form NIS-2A.
4. Form NIS-2A shall be presented to the Inspector for certification.
5. The completed Form NIS-2A shall be maintained by the owner.
6. The owner shall maintain an index of Repair/Replacement Plans in accordance with IWA-6340. The index shall identify the identification number required by (2) above and the inspection interval and period during which each repair or replacement was completed.

Currently, the Brunswick Plant is using the alternative requirements of Code Case N-308, "Documentation of Repairs and Replacements of Components in Nuclear Power Plants," to document that a repair or replacement has been performed. Code Case N-308 allows the use of Form NIS-2 for documenting these activities. Implementation of Code Case N-532 will still require documentation and certification by the Inspector upon completion of these activities. Therefore, approval of these proposed alternatives will not decrease the level of quality and safety at the Brunswick Plant.

Code Case N-532 also allows alternative requirements for preparation and submittal of the Inservice Summary Report (Form NIS-1) provided that:

1. An Owner's Activity Report Form OAR-1 is prepared and certified upon completion of each refueling outage.
2. Each Form OAR-1 prepared during an inspection period shall be submitted following the end of the inspection period and contains the following information:
 - a) Abstract of applicable examinations and tests with the information and format of Table 1 shown in Code Case N-532.
 - b) A listing of item(s) with flaws or relevant conditions that required evaluation to determine acceptability for continued service, whether or not the flaw or relevant condition was discovered during a scheduled examination or test. The listing shall provide the information in the format of Table 2 shown in Code Case N-532.
 - c) Abstract for repairs, replacements and corrective measures performed, which were required due to an item containing a flaw or relevant condition that exceeded IWB-3000, IWC-3000, IWD-3000, IWE-3000, IWF-3000, or IWL-3000 acceptance criteria; even though the discovery of the flaw or relevant condition that necessitated the repair, replacement or corrective measure, may not have resulted from an examination or test required by the ASME Code, Section XI, Division 1. If acceptance criteria for a particular item is not specified in this Division, the provision of IWA-3100(b) shall be used to determine which repairs, replacements, and corrective measures are required to be included in the abstract. The abstract shall provide the information in the format of Table 3 shown in Code Case N-532.

The Brunswick Plant is currently using the preparation and submittal requirements of IWA-6220 and IWA-6230 of the 1980 Edition (with Addenda through Winter 1981) of the ASME Code, Section XI. The requirements of these subarticles require that examinations, tests, replacements and repairs conducted since the preceding summary report be filed with the enforcement and regulatory authorities within ninety (90) days of the completion of the inservice inspection conducted during a refueling outage.

Implementation of Code Case N-532 will still require an Owner's Activity Report (Form OAR-1) be prepared and certified by an Inspector upon completion of each refueling outage. However, submittal of each Owner's Activity Report (Form OAR-1) will only be required at the end of the inspection period. In addition, it will no longer be necessary to submit the large quantity of supporting information with the Inservice Summary Report required by the 1980 Edition (with Addenda through Winter 1981) of the ASME Code, Section XI. Decreasing the frequency of filing of these reports (from after each refueling outage to once at the end of the inspection period) and not submitting the supporting information no longer considered relevant by the ASME Committee will not decrease the level of quality or safety at the Brunswick Plant. The performance of the examinations, tests, replacement, and repair activities required by the ASME Section XI will not be affected by approval of CP&L's use of Code Case N-532. In addition, records documenting the above activities will still be maintained for the service lifetime of the component or systems as required by IWA-1400 and will be available to the enforcement and regulatory authorities for review.

Carolina Power & Light Company requests that the NRC grant approval to use the alternative provisions of ASME Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000 Section XI, Division 1", for the remainder of the second ten-year inservice inspection interval or until such time as Code Case N-532 is incorporated into Regulatory Guide 1.147. Approval to implement Code Case N-532 will considerably reduce the man-hours currently being spent to submit the inservice summary report for Class 1 and 2 pressure retaining components and their supports after each refueling outage. The alternative requirements specified by ASME Code Case N-532 will provide an acceptable level of quality and safety.