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William R. Campbell
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SERIAL: BSEP 96-0041
10 CFR 50.90
TSC 95TSB34

JAN 29 1996

U. S. Nuclear Regulatory Commission
ATTN: 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
SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS
CONTAINMENT LEAKAGE RATE TESTING

Gentlemen:

By letters dated September 13, 1995 (Serial: BSEP 95-0316) and November 27, 1995 (Serial: BSEP-95-0605), Carolina Power & Light Company (CP&L) submitted to the Nuclear Regulatory Commission (NRC) license amendment requests to revise the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendments support implementation of performance-based containment leakage rate testing requirements approved by the NRC through the issuance of 10 CFR Part 50, Appendix J, Option B. The purpose of this letter is to update CP&L's November 27, 1995 submittal to incorporate changes resulting from comments provided by the NRC Staff.

Enclosure 1 provides a description of the revisions being made to the original license amendment request.

Due to the additional information added to the Technical Specification Bases, CP&L has updated the instructions for insertion and removal of the new Technical Specification pages. The updated instructions are provided in Enclosure 2.

Enclosure 3 provides mark-ups of the previously submitted typed Technical Specification pages for Unit 1.

Enclosure 4 provides mark-ups of the previously submitted typed Technical Specification pages for Unit 2.

Enclosure 5 provides the revised typed Technical Specification pages for Unit 1.

Enclosure 6 provides the revised typed Technical Specification pages for Unit 2.

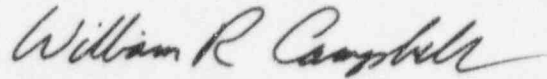
Carolina Power & Light Company has reviewed the revisions to the previously submitted Technical Specification changes and determined the conclusions of the significant hazards evaluation published in the Federal Register on December 12, 1995 (61 FR 63739) remain valid.

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AD17.1

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

Sincerely,



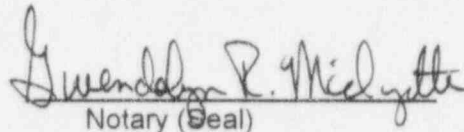
William R. Campbell

WRM/wrm

Enclosures:

1. Description of Changes
2. Page Change Instructions
3. Mark-ups of Typed Technical Specification Pages - Unit 1
4. Mark-ups of Typed Technical Specification Pages - Unit 2
5. Typed Technical Specification Pages - Unit 1
6. Typed Technical Specification Pages - Unit 2

William R. Campbell, 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, and agents of Carolina Power & Light Company.



Notary (Seal)

My commission expires: *August 13, 1996*

pc: Mr. D. H. Brown, State of North Carolina
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, Brunswick NRC Senior Resident Inspector
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 NRC DOCKET NOS. 50-325 AND 50-324 OPERATING LICENSE NOS. DPR-71 AND DPR-62 SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS CONTAINMENT LEAKAGE RATE TESTING

DESCRIPTION OF CHANGES

BACKGROUND:

By letters dated September 13, 1995 (Serial: BSEP 95-0316) and November 27, 1995 (Serial: BSEP-95-0605), Carolina Power & Light Company (CP&L) submitted to the Nuclear Regulatory Commission (NRC) license amendment requests to revise the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendments support implementation of performance-based containment leakage rate testing requirements approved by the NRC through the issuance of 10 CFR Part 50, Appendix J, Option B.

DESCRIPTION:

The changes described herein are being made to update CP&L's November 27, 1995 submittal based on review comments provided verbally by the NRC Staff.

Item 1:

An administrative change is being made to the references pertaining to air lock testing following replacement of the air lock door seals. Carolina Power & Light Company wishes to maintain the existing allowance (previously approved as an exemption to 10 CFR 50, Appendix J, Option A) to perform air lock door seal leakage rate testing at a pressure less than P_a ; therefore, an exception is being added to the new proposed Technical Specification 6.8.3.4 which describes the Primary Containment Leakage Rate Testing Program.

Specification 4.6.1.3.a currently allows the performance of a primary containment air lock seal leakage rate test at a test pressure less than P_a following air lock seal replacement (rather than requiring the performance of an overall air lock leakage test). In contrast, Nuclear Energy Institute Guideline 94-01, Section 10.2.2.2, "Repairs or Adjustments of Airlocks" states that following maintenance on an air lock pressure retaining boundary, one of the following tests shall be completed:

- a. The air lock shall be tested at a pressure of not less than P_a , or
- b. Leakage rate testing at P_a shall be performed on the affected area or component.

Currently, a footnote and two footnote designations found on Technical Specification page 3/4 6-5 indicate the use of an approved exemption to Appendix J of 10 CFR 50 allowing the performance of air lock seal leakage rate testing at a pressure less than P_a (Technical Specification 4.6.1.3.a specifies that the gap between the door seals be pressurized to 10 psig). Because this allowance will now be documented through the exception listed in Specification 6.8.3.4, the footnote designating the exemption is no longer needed and is being deleted. An

exception is being added to Technical Specification 6.8.3.4 to describe the leakage rate testing of air lock door seals and a description of how this item is being retained in the Technical Specifications is being added to Bases 3/4.6.1.2.

Item 2:

An administrative change is being made to revise the references to NRC Regulatory Guide 1.163, "Performance-Based Containment Leak-Rate Testing Program." Currently, the Regulatory Guide 1.163 is designated as "Revision 0" in several instances in the Technical Specification Bases. Since the original issue of this Regulatory Guide does not actually have a revision number, the "Revision 0" designation is being deleted from the Regulatory Guide 1.163 references in Technical Specification Bases Sections 3/4.6.1.2, 3/4.6.1.3, and 3/4.6.1.4. The date of issue of Regulatory Guide 1.163 will be maintained to allow for proper referencing.

Item 3:

An administrative change is being made to revise several references to 10 CFR Part 50, Appendix J as used throughout the proposed Technical Specifications. The reference is being revised to "10 CFR 50, Appendix J, Option B" to more clearly tie the new changes to the performance-based leakage testing requirements contained in 10 CFR Part 50, Appendix J, Option B. This change is being made to the following locations in the proposed Technical Specifications:

1. Bases 3/4.6.1.2, Reference 1.
2. Bases 3/4.6.1.3, Reference 1.
3. Technical Specification 6.8.3.4.

Item 4:

Bases 3/4.6.1.3 (fourth paragraph) states the following:

The Primary Containment Leakage Rate Testing Program conforms to NRC Regulatory Guide 1.163 dated September 1995, "Performance-Based Containment Leak-Rate Testing program" and Nuclear Energy Institute (NEI) 94-01, Revision 0, dated July 26, 1995, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J" as modified by approved exceptions (References 2 and 3).

An administrative change is being made to revise the reference to "approved exceptions." The reference is being revised to state "the exceptions listed in Specification 6.8.3.4." This change will clarify that the exceptions to the implementation guidance provided in NEI 94-01 are those listed in Specification 6.8.3.4.

SUMMARY:

Carolina Power & Light Company has reviewed the revisions provided herein with respect to the 10 CFR 50.92 evaluation provided with our November 27, 1995 submittal. The revisions

provided herein (1) update document references for 10 CFR 50, Appendix J, Option B and NRC Regulatory Guide 1.163, (2) clarify cross-references with respect to approved exceptions to the implementation guidance provided in NEI 94-01, and (3) retain and relocate within the Technical Specifications a currently approved exemption. As such, these changes are administrative in nature and do not affect the conclusions of the significant hazards evaluation published in the Federal Register on December 12, 1995 (61 FR 63739).

Due to the additional information added to the Technical Specification Bases, CP&L has updated the instructions for insertion and removal of the new Technical Specification pages. The revised instructions are provided in Enclosure 2 of this submittal.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
 NRC DOCKET NOS. 50-325 AND 50-324
 OPERATING LICENSE NOS. DPR-71 AND DPR-62
 SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS
 CONTAINMENT LEAKAGE RATE TESTING

<u>PAGE CHANGE INSTRUCTIONS</u>	
<u>UNIT 1</u>	
Removed page	Inserted page
XV	XV
3/4 6-2	3/4 6-2
3/4 6-3	3/4 6-3
3/4 6-5	3/4 6-5
3/4 6-6	3/4 6-6
B 3/4 6-1	B 3/4 6-1
---	B 3/4 6-1a
---	B 3/4 6-1b
B 3/4 6-2	B 3/4 6-2
---	B 3/4 6-2a
6-16	6-16
6-17	6-17
---	6-17a

PAGE CHANGE INSTRUCTIONS

UNIT 2

Removed page	Inserted page
XV	XV
3/4 6-2	3/4 6-2
3/4 6-3	3/4 6-3
3/4 6-5	3/4 6-5
3/4 6-6	3/4 6-6
B 3/4 6-1	B 3/4 6-1
---	B 3/4 6-1a
---	B 3/4 6-1b
B 3/4 6-2	B 3/4 6-2
---	B 3/4 6-2a
6-16	6-16
6-17	6-17
---	6-17a

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
NRC DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS
CONTAINMENT LEAKAGE RATE TESTING

MARK-UPS OF TYPED
TECHNICAL SPECIFICATION PAGES - UNIT 1