

CP&L

Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

SEP 26 1984

SERIAL: NLS-84-423

E. E. UTLEY
Executive Vice President
Power Supply and Engineering & Construction

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-324/LICENSE NO. DPR-62
ENVIRONMENTAL QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT

Dear Mr. Denton:

Carolina Power & Light Company (CP&L) has reviewed your letter dated September 19, 1984 requesting additional information concerning environmental qualification (EQ) of safety-related equipment at the Brunswick Steam Electric Plant, Unit No. 2. In response to this request, the following information is provided:

Carolina Power & Light Company hereby confirms its belief that equipment failures which would mislead the operator or significantly degrade safety functions will not occur due to the environment resulting from a design basis event. This belief is based in part on our review of the equipment including, where appropriate, consideration of:

1. Accomplishing the safety function by some designated alternative equipment.
2. Review of partial test data.
3. Limited use of administrative controls.
4. Completion of the safety function prior to exposure of the equipment to an environment resulting from a design basis event which might degrade the equipment.

In addition, the Emergency Operating Procedures provide cautions to the operator not to rely on any single indication and provides a list of instrumentation which may be used to verify the accuracy of suspect indications. Carolina Power & Light Company would like to note that in general JCOs have been submitted on equipment because of a lack of definitive documentation of qualification, not because the equipment is assumed to fail.

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Carolina Power & Light Company has considered the feasibility of conducting required modification work while the plant is at power by voluntarily entering Limiting Conditions for Operation (LCOs) action statements. Our policy regarding use of LCOs to perform modification work is that LCOs will only be taken when:

1. it is absolutely safe to do so, and
2. the safety significance of the modification warrants such action.

In general, CP&L does not believe the use of LCOs to accomplish modifications to be a good practice in that the degree of added assurance of safety gained by performing most modifications is outweighed by the degree of jeopardy placed on the plant by taking the affected safety system out of service while the modification is made. Our goal is to complete these modifications in a timely, but safe, manner. However, as these modifications involve safety-related equipment, it is prudent to establish schedules on the assumption that they will have to be made during plant outages.

As requested, CP&L has attempted to determine the time needed to complete the installation of EQ related equipment currently qualified and available for use in Brunswick-2. Carolina Power & Light Company estimates that the modifications necessary to complete this scope of work could not be completed prior to the end of September 1985. This estimate is based on the most time limiting task and includes equipment which may not presently be on site but is available for fabrication and procurement from equipment vendors.

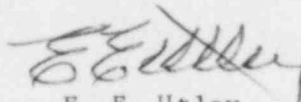
Carolina Power & Light Company has also evaluated the feasibility of completing a portion of this work on a more expedited schedule by extending the current outage and excluding certain long lead time items. Items chosen to be excluded were selected based on the level of job complexity and equipment availability. Three major tasks were chosen as follows:

1. Reactor Instrument Penetration (RIP) Valves - This modification, which has already been performed on some instrument lines, will replace the existing RIP valve system consisting of solenoid valves, pressure switches, and indicating switches with fully qualified excess flow check valves.
2. Standby Instrument Air System - This modification provides a nitrogen backup supply to the pneumatic devices required in a post-accident environment.
3. Dedicated Hydrogen Control System - This modification will replace certain air-operated valves with redundant, single-failure proof solenoid valves. This modification is also associated with NUREG-0737, Item II.E.4.1, dedicated hydrogen penetrations, and is being performed in conjunction with Item 2 above.

Carolina Power & Light Company estimates that by excluding these three modification packages, the remaining modifications involving available qualified equipment would not be completed before the end of March 1985.

Carolina Power & Light Company would like to emphasize that our engineering resources are presently dedicated to completion of the EQ work associated with Brunswick-1 during the upcoming outage scheduled for March 1985. Redirection of these resources towards an unplanned partial completion of work on Brunswick-2 would prevent use of these resources on Unit 1 and would most likely prolong the time needed to bring Unit 1 into compliance with 10CFR50.49.

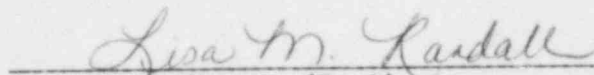
Yours very truly,


E. E. Utley

JSD/mf (635JSD)

cc: Mr. D. O. Myers (NRC-BNP)
Mr. J. P. O'Reilly (NRC-R11)
Mr. M. Grotenhuis (NRC)

E. E. Utley, 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.


Notary (Seal)

My commission expires: 5/13/88

