



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 74 TO FACILITY LICENSE NO. DPR-71 AND
AMENDMENT NO. 100 TO FACILITY LICENSE NO. DPR-62
CAROLINA POWER & LIGHT COMPANY
BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324

1.0 Introduction

By letter dated May 7, 1984 the Carolina Power & Light Company (CP&L/the licensee) submitted proposed changes to the Technical Specifications (TSs) appended to Facility Operating License Nos. DPR-71 and DPR-62 for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2. The proposed amendment would revise Section 3/4.7.5 of the Technical Specifications to eliminate Table 3.7.5-1 (Safety-Related Hydraulic Snubbers) and conform with the guidance provided by the Commission in its letter dated May 3, 1984 (Generic Letter No. 84-13) and to incorporate miscellaneous administrative changes to Sections 3/4.7.6 and 3/4.7.7.

2.0 Evaluation

Deletion of Table 3.7.5-1 from the Brunswick-1 and Brunswick-2 TSs eliminates the need for frequent TS amendments to incorporate changes in the snubber listing. This list of individual snubber location, size, and system affected will be maintained in the plant procedures as required by Section 50.71(c) of 10 CFR 50. The reformatted TS Section 3/4.7.5 includes essentially the same requirements as the current Brunswick TS. The Limiting Conditions for Operation (LCOs) remain the same in both cases. Major differences include: (1) the additional requirement of a Transient Event Inspection (Section 4.7.5.j), and (2) altered sample plans (Section 4.7.5.e) which are used to determine the number of snubbers required to be functionally tested. The Basis for Section 3/4.7.5 is also revised to reflect the changes made to Section 3/4.7.5.

Previously the staff has evaluated the inclusion of the snubber listings in the Technical Specifications and has concluded that such listings are not necessary provided the snubber Technical Specification is modified to specify which snubbers are required to be operable. The recordkeeping requirements of the snubber Technical Specifications are not to be altered by this revision. Further, the plant records must contain a record of the service life, installation date, etc. of each snubber. Since any change in snubber quantities, types, or locations would be a change to the facility, such changes would be subject to the provisions of 10 CFR Part 50.59 and,

of course, these changes would have to be reflected in the records required. The May 3, 1984 letter to all licensees indicated the above conclusion regarding inclusion of snubber tables in the Technical Specifications and indicated that such changes were not required but that the licensee could choose to request an amendment to delete the tabular listing of snubbers.

The licensee has chosen to delete Table 3.7.5-1 from the Units 1 and 2 Technical Specifications. This change is in accordance with guidance issued to the licensees in NRC Generic Letter No. 84-13, dated May 3, 1984, Subject: Technical Specification for Snubbers (Generic Letter 84-13). The licensee will instead maintain the list of safety-related snubbers in the plant surveillance procedures. Changes to the list are subject to the provisions of 10 CFR Part 50.59.

The licensee has also revised TS Section 3/4.7.5 and the basis for this section to conform with guidance provided by NRC to recently licensed and near term operating license (OL) facilities. These revisions add the requirement for a transient event inspection and alter the sample plan used to determine the number of snubbers to be functionally tested.

The miscellaneous administrative changes to TS Sections 3/4.7.6 and 3/4.7.7 involve replacement of the symbol \geq by the words "greater than or equal to" and renumbering of pages.

Based on our review and the fact that the deletion of the snubber table with the associated requirements is consistent with guidance provided to the licensees, the staff concludes that the proposed amendment, which includes the removal of the snubber tables, is acceptable.

3.0 Environmental Considerations

The amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

4.0 Conclusions

We have concluded, based on the considerations discussed above, that:
(1) there is reasonable assurance that the health and safety of the public

will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: September 10, 1984