

Carolina Power & Light Company

SERIAL: NLS-84-387

SEP 2 5 1984

Director of Muclear Reactor Regulation Attention: Mr. D. B. Vassallo, Chief Operating Reactors Branch No. 2 Division of Licensing United States Nuclear Regulatory Commission Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62 SPENT FUEL POOL MODIFICATION

Dear Mr. Vassallo:

In a letter dated September 16, 1982, Carolina Power & Light Company (CP&L) provided responses to a request for additional information made by members of your staff regarding the modification of the Brunswick Steam Electric Plant (BSEP) spent fuel storage pools. In its response to one of these questions, CP&L stated that during the modification process, spent fuel would be moved so that no spent fuel is located in the racks adjacent to the work area. This commitment was echoed in the SER, (issued by your staff in a letter dated December 15, 1983), in Section 2.3, Installation and Heavy Load Handling Considerations.

By stipulating that spent fuel would not be located in racks adjacent to the work area, a minimum buffer area of 2 1/2 feet is established around the work area since the old half racks have a smallest horizontal dimension of 2 1/2 feet. Subsequent to this commitment, a refueling outage on Brunswick-1 has resulted in approximately 100 more spent fuel bundles being present in the pool during the re-rack operation. As a result, some fuel will have to be transferred to the first new rack to permit installation of the second new rack. Because the two racks are adjacent to one another, CP&L cannot maintain a "one rack" buffer adjacent to the work area. Carolina Power & Light Company therefore proposes to modify its commitment and will maintain, adjacent to the work area, a 2 1/2 foot buffer area void of fuel. This is as conservative as our original commitment in that it provides a minimum buffer around the work area equal to the approved minimum buffer area.

Carolina Power & Light Company believes that the proposed 2 1/2 foot buffer will provide sufficient margin for the new modules such that the potential for a fuel damaging accident involving heavy loads during the pool reracking has not been increased by this requested change to our commitment. Carolina Power & Light Company requests approval of this change by October 10, 1984 in order to support the modification of the Brunswick-1 pool on schedule and to avoid impacting the spring 1985 Brunswick-1 outage.

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Mr. D. B. Vassallo

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Should you have any questions regarding this issue, please contact Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,

A. B. Cutter - Vice President

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JSD/ccc (525JSD)

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