



Carolina Power & Light Company

SEP 26 1984

SERIAL: NLS-84-407

Director of Nuclear 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 NO. 2  
DOCKET NO. 50-324/LICENSE NO. DPR-62  
REQUEST FOR LICENSE AMENDMENT  
DRYWELL HYDROGEN/OXYGEN MONITORS - ADMINISTRATIVE CHANGES

Dear Mr. Vassallo:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the Brunswick Steam Electric Plant, Unit No. 2. The proposed changes, which are administrative in nature, revise TS Tables 3.3.5.2-1 and 4.3.5.2-1 and TS 3/4.6.6.4 to reflect requirements for the drywell/suppression chamber hydrogen and oxygen analyzers recently issued as Brunswick-2 Amendment No. 99.

DISCUSSION

On August 13, 1984, the Commission issued Amendments 73 and 99 to the Operating Licenses for Brunswick-1 and Brunswick-2, respectively. These amendments incorporated Technical Specification changes relating to NUREG-0737 items concerning monitoring of radiation releases, containment conditions, and control room habitability. One of these TMI Action Plan items (II.F.1.6) dealt with containment hydrogen monitoring for Brunswick-2.

The Technical Specifications for Brunswick-1 concerning TMI Action Plan Item II.F.1.6, containment hydrogen monitors were previously issued by Amendment 63 dated December 28, 1983. These Brunswick-1 Technical Specification changes included the incorporation of revised instrument tag numbers in TS Tables 3.3.5.3-1 and 4.3.5.3-1 (accident monitoring instrumentation), the deletion of references to drywell oxygen concentration monitors in TS Table 3.3.5.2-1 and 4.3.5.2-1 (remote shutdown monitoring instrumentation), and the incorporation of revised instrument tag numbers and calibration gas sample ranges in TS 3/4.6.6.4 (gas analyzer systems).

During the preparation of the March 2, 1984 request (which resulted in Amendment 99 for Brunswick-2), CP&L inadvertently did not identify TS Tables 3.3.5.2-1 and 4.3.5.2-1 (remote shutdown monitoring instrumentation) or TS 3/4.6.6.4 (gas analyzer systems) as needing revisions in order to be

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consistent with (1) the proposed TS to address TMI Action Item II.F.1.6, and (2) the same requirements in the Brunswick-1 Technical Specifications. Consequently, these Technical Specification requirements were not revised when the Brunswick-2 Amendment 99 changes were issued.

The enclosed Technical Specification changes delete item 7, drywell oxygen concentration, and renumber items 8, 9, and 10 in TS Tables 3.3.5.2-1 and 4.3.5.2-1. The drywell oxygen concentration indication on the remote shutdown panel has been removed as part of the replacement of the existing drywell hydrogen/oxygen monitoring system with a new wide-range monitoring system. The changes enclosed are consistent with both the existing Brunswick-1 Technical Specifications and the GE/BWR-4 Standard Technical Specifications guidance. The enclosed changes also revise TS 4.6.6.4 by incorporating the increased calibration gas sample ranges necessary due to the increased measurement range of the new hydrogen and oxygen monitoring system and by incorporating revised instrument tag numbers. Similar Technical Specification changes were previously issued as Amendment 63 for Brunswick-1.

#### SIGNIFICANT HAZARDS ANALYSIS

The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards consideration by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). Examples of an amendment likely to involve no significant hazards consideration include: (1) a purely administrative change, and (2) a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications. The revised calibration gas sample ranges are needed to reflect the increased measurement range of the new monitoring system and, therefore, constitute additional limitations. The deletion of drywell oxygen concentration from the remote shutdown instrument panel constitutes an administrative change since the change is consistent with the previously approved Brunswick-1 TS and the GE BWR-4 standard TS guidance and reflects the actual plant installation. In addition, TS addressing this equipment are already included as part of the accident monitoring instrumentation listed in TS Tables 3.3.5.3-1 and 4.3.5.3-1. The changing of instrument numbers in TS Tables 3.3.5.2-1 and 4.3.5.2-1 and in TS 3/4.6.6.4 also represents an administrative change. Since the proposed amendment involves only the addition of new, revised surveillance requirement criteria and various administrative changes, this request does not result in a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from an accident previously evaluated, and does not result in a significant reduction in a margin of safety. Therefore, CP&L has determined that the proposed amendment falls under the criteria of Examples (i) and (ii) and, as such, involves no significant hazards consideration.

#### ADMINISTRATIVE INFORMATION

The proposed Brunswick-2 Technical Specification pages are included in Enclosure 1, along with a summary of the changes made to each page. Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10 CFR 170.12 and has determined that an application fee is required. A check for \$150.00 is enclosed in payment of this fee.

Mr. D. B. Vassallo

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

Yours very truly,

*P. W. Howe*  
*for* A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

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Enclosures

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

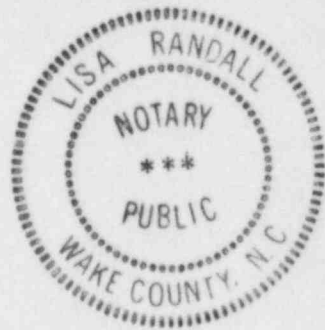
Mr. Dayne H. Brown  
Radiation Protection Branch  
Division of Facility Services  
Department of Human Resources

*P. W. Howe*

~~A. B. Cutter~~, 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.

*Lisa M. Randall*  
Notary (Seal)

My commission expires: *5/18/88*



ENCLOSURE 1

SERIAL NO. NLS-84-407

BRUNSWICK STEAM ELECTRIC PLANT  
PROPOSED TECHNICAL SPECIFICATION PAGES - UNIT 2  
REFERENCE NUMBER 84TSB39

SUMMARY OF CHANGES

<u>PAGE</u>	<u>COMMENT</u>
3/4 3-48	Item 7, Drywell Oxygen Concentration deleted. Items 8, 9, and 10 renumbered as items 7, 8, and 9.
3/4 3-49	Item 7, Drywell Oxygen Concentration deleted. Items 8, 9, and 10 renumbered as items 7, 8, and 9.
3/4 6-30	TS 4.6.6.4 - Instrument tag numbers revised to reflect new, installed equipment.  TS 4.6.6.4 - Existing item c renumbered as item d. New item c added to cover the 25-30 volume percent hydrogen range. New item e added to cover the 7-10 volume percent oxygen range. Existing item d renumbered as item f and revised to cover the 20-25 volume percent oxygen range.