

MAY 15 1992

Docket Nos. 50-325, 50-324
License Nos. DPR-71, DPR-62

Carolina Power and Light Company
ATTN: Mr. R. A. Watson
Senior Vice President
Nuclear Generation
P. O. Box 1551
Raleigh, NC 27602

*Official
Copy*

Gentlemen:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE FOR BRUNSWICK UNITS 1
AND 2

This letter acknowledges your letter of May 8, 1992, requesting a Temporary Waiver of Compliance from the Action Statements associated with Technical Specification 3.3.5.9, Table 3.3.5.9-1, Item 1. Table 3.3.5.9-i, Item 1 (Main Stack Monitoring System) requires the system's noble gas activity monitor, iodine sampler cartridge, particulate sampler filter, system effluent flow rate measurement device, and sampler flow rate measurement device to be OPERABLE at all times. If the noble gas activity monitor is out of service, Action Statement 123 requires grab samples to be taken at least every 12 hours and analyzed. If the iodine sampler cartridge or particulate sampler filter are out of service, Action Statement 127 requires samples to be continuously collected (using auxiliary sampling equipment) and analyzed. If the system effluent flow rate measurement device or sampler flow rate measurement device are out of service, Action Statement 122 requires pathway flow rate to be estimated at least every eight hours.

Your letter requested that the main stack monitoring system be taken out of service without the performance of Action Statements 122, 123 and 127. This request was made in support of necessary modifications to the main stack isokinetic sampling probe, which when taken out of service, renders the main stack monitoring system inoperable and precludes alternate sampling required by Action Statements 122, 123 and 127. In addition, the main stack high radiation instrument's primary containment purge and vent valve isolation function will also be disabled. This is an automatic function required by Technical Specifications in Operational Conditions 1, 2 and 3.

Recognizing the need to modify the main stack isokinetic sampling probe, and discerning no adverse impact, your May 8, 1992 Temporary Waiver Request was

050171

9206090028 920515
PDR ADOCK 05000324
P PDR

IE01

MAY 15 1992

Carolina Power and Light Co.

3

(cc cont'd)
H. Ray Starling
Manager - Legal Department
Carolina Power and Light Co.
P. O. Box 1551
Raleigh, NC 27602

Kelly Holden
Board of Commissioners
P. O. Box 249
Bolivia, NC 28422

Chrys Baggett
State Clearinghouse
Budget and Management
116 West Jones Street
Raleigh, NC 27603

Dayne H. Brown, Director
Division of Radiation Protection
N. C. Department of Environment,
Health & Natural Resources
P. O. Box 27687
Raleigh, NC 27611-7687

H. A. Cole
Special Deputy Attorney General
State of North Carolina
P. O. Box 629
Raleigh, NC 27602

Robert P. Gruber
Executive Director
Public Staff - NCUC
P. O. Box 29520
Raleigh, NC 27626-0520

bcc: (See page 4)

MAY 15 1992

Carolina Power and Light Co.

4

bcc: Document Control Desk
T. Murley, Director, NRR
S. Varga, Director, Reactor Projects I/II
J. Lieberman, Director, OE
Technical Assistant, Reactor Projects I/II
H. Christensen, RII
R. Lo, NRR

NRC Resident Inspector
U.S. Nuclear Regulatory Commission
Star Route 1, Box 208
Southport, NC 28461

RII:DRP

DV
DVerrelli:tj
05/15/92

RII:DRP

LF
LFreyes
05/15/92

RII:EICS

GJ
GJenkins
05/15/92

NRR:PD I/II

EA
EAdensam
05/14/92

RII:ORA

JM
JMilhoan
05/15/92

MAY 15 1992

Carolina Power and Light Co.

2

granted verbally by the Regional Administrator on May 15, 1992 with the following understandings:

- (1) The waiver is for a single 24-hour period, which will occur during the current dual unit outage.
- (2) NRC (Region II) will be notified by CP&L approximately 48 hours prior to proceeding with actual implementation of the modification.
- (3) During the 24-hour waiver period, the units will remain in cold shutdown (Operational Condition 4) and other plant activities that have the potential for changing the levels of radioactive effluents released (i.e., fuel movements; grinding; cutting, or welding work relating to the primary containment; etc...) will be restricted.
- (4) As described in Enclosure 1 of your letter, alternative methods will be established for the monitoring of changes to effluent releases and to account for effluent releases that might occur during the 24-hour waiver period.

Sincerely,

Original signed by:
James L. Milhoan/for

Stewart D. Ebnetter
Regional Administrator

cc: R. B. Richey
Vice President
Brunswick Nuclear Project
P. O. Box 10429
Southport, NC 28461

J. W. Spencer
Plant General Manager
Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461

(cc cont'd - See page 2)