



Carolina Power & Light Company

OCT 24 1984

SERIAL: NLS-84-066

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 NOS. 1 AND 2  
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62  
REQUEST FOR LICENSE AMENDMENT  
CONTAINMENT SYSTEMS - PRIMARY CONTAINMENT AIR LOCKS

Dear Mr. Vassallo:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Part 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 (BSEP), Unit Nos. 1 and 2. The proposed TS will change the Limiting Condition for Operation (LCO), the Surveillance Requirements and the associated bases for Specification 3/4.6.1.3, Primary Containment Air Locks, to specifically address the air lock door interlocks. Additionally, the TS will be reformatted to more closely follow the guidance of the Standard Technical Specifications.

DISCUSSION

The current Specification does not specifically address an inoperable door interlock in the LCO. As such, it could be interpreted that an inoperable door interlock falls outside the "degraded mode" permitted by Paragraph 3.6.1.3(a) and (b). Were that to be the interpretation, this interlock would fall under Paragraph 3.6.1.3(c) which directs the plant to be in hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours. The Company believes that this was not the intent of the Specification, since an inoperative doorlock is clearly of a similar nature as the "degraded mode" permitted by paragraphs 3.6.1.3(a) and (b).

The Company, therefore, proposes that the action described for an inoperable air lock door is sufficient to compensate for an inoperable door interlock.

The current Technical Specification requires that the operation of the air lock door interlock be verified every six months. This verification presents the following problems:

- 1) The interlock surveillance is performed independently of the air lock operability surveillance.

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- 2) The interlock surveillance cannot be performed when the unit is at power with the drywell inerted, as the drywell is inaccessible.
- 3) A low power drywell entry just to perform the interlock surveillance would present an unnecessary safety hazard and increase radiation exposure to personnel performing the test.

The proposed revision requiring verification after each entry (except during periods of multiple entries where it is tested at least every 72 hours) will present the following resolutions:

- 1) The interlock surveillance will be added to the air lock surveillance requirements. Thus, the two surveillances will be performed simultaneously, ensuring that the interlock is operable whenever the air lock is required to be operable.
- 2) The surveillances will be performed with the unit in cold shutdown and prior to entering operational conditions 1, 2, or 3. The above surveillance requirement is in the BSEP pre-startup checklist and in the drywell closure checklist. After the surveillance requirement is satisfactorily completed, access to the drywell is secured. This will ensure air lock and interlock operability in operational conditions 1, 2, or 3 and until another drywell entry is made. Whenever the drywell is entered, the surveillance requirement must be repeated prior to drywell closure.
- 3) With the surveillances being performed simultaneously in cold shutdown, an additional drywell entry is not necessary. This will, therefore, reduce personnel exposure to radiation and prevent an additional safety hazard.
- 4) The increased surveillance on the interlock will result in an increased level of confidence in the interlock's operability.

Additionally, the specification is being reformatted to be consistent with the GE/BWR-4 Standard Technical Specification format.

#### SIGNIFICANT HAZARDS ANALYSIS

The Company has reviewed this request and determined that the proposed revisions to Specification 3/4.6.1.3 involves no significant hazards consideration because the proposed changes do not (1) involve an increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a reduction in a margin of safety.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870). The examples of actions involving no significant hazards consideration include: (i) a purely administrative change to the Technical Specifications; for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature; and (ii) a change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications.

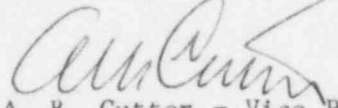
The proposed change pertaining to the inoperable door interlock and the reformatting of the Specification is purely an administrative change as in example (i). The proposed revision requiring verification after air lock entry (except during periods of multiple entries where it will be tested at least every 72 hours) constitutes additional controls not presently included in the Technical Specifications and is, therefore, encompassed by example (ii). Thus, the proposed changes discussed in this request are either administrative changes or constitute additional controls not presently included in the specification and, therefore, conform to examples for which no significant hazards consideration exist.

ADMINISTRATIVE INFORMATION

Enclosed are revised TS pages for Brunswick-1 and Brunswick-2 with the changes indicated by vertical lines in the right-hand margin. In accordance with the criteria in 10 CFR 170.12, it has been determined that a license amendment application fee is required. Therefore, our check for \$150.00 is enclosed as payment of this fee.

Should you have any questions concerning this submittal, please do not hesitate to contact Mr. Sherwood R. Zimmerman at (919) 836-6242.

Yours very truly,



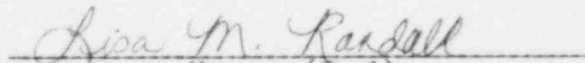
A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

PPC/ccc (9489PPC)  
Enclosures

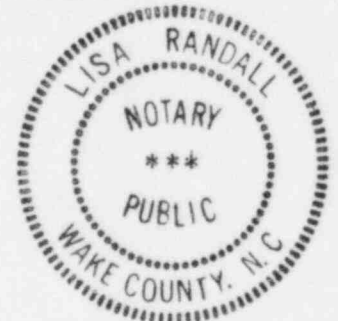
cc: Mr. Dayne H. Brown  
Radiation Protection Branch  
Division of Facility Services  
Department of Human Resources

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

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.

  
Notary (Seal)

My commission expires: 5/18/88



SUMMARY LIST OF REVISION  
BRUNSWICK UNIT 1  
(CP&L SERIAL: 84TSB03)

<u>PAGE</u>	<u>COMMENT</u>
3/4 6-4	a) Under "APPLICABILITY" the word "OPERATIONAL" has been added. b) Under ACTION the entire statement has been revised to reflect the format used in the Standard Technical Specification (STS) and the words "or the primary containment air lock door interlock inoperable" have been inserted in action a. The words "or an inoperable air lock door interlock" have been inserted in action b. c) Action c has been deleted.
3/4 6-5	a) The SURVEILLANCE REQUIREMENTS have been revised to reflect the STS format.
B3/4 6-1	a) The bases have been changed to reflect the STS format.

SUMMARY LIST OF REVISION  
BRUNSWICK UNIT 2  
(CP&L SERIAL: 84TSB03)

3/4 6-4	a) Under "APPLICABILITY" the word "OPERATIONAL" has been added. b) Under ACTION the entire statement has been revised to reflect the format used in the Standard Technical Specification (STS) and the words "or the primary containment air lock door interlock inoperable" have been inserted in action a. The words "or an inoperable air lock door interlock" have been inserted in action b. c) Action c has been deleted.
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