



Carolina Power & Light Company
P.O. Box 10429
Southport, NC 28461-0429

April 4, 1996

SERIAL: BSEP 96-0126
10 CFR 50.90
TSC 87TS

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
APPLICABILITY AND SURVEILLANCE REQUIREMENTS

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests amendments to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. This request revises Technical Specifications 3.0 and 4.0, and bases for these sections. These changes were developed using the guidance contained in Generic Letter 87-09 and NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 1, April 1995.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides an environmental evaluation which demonstrates that the proposed amendments meet the eligibility for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides page change instructions for incorporating the proposed revisions.

Enclosure 5 provides the marked-up Technical Specification pages for Unit 1.

Enclosure 6 provides the marked-up Technical Specification pages for Unit 2.

Enclosure 7 provides the typed Technical Specification pages for Unit 1.

Enclosure 8 provides the typed Technical Specification pages for Unit 2.

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Carolina Power & Light Company is providing, in accordance with 10 CFR 50.91(b), Mr. Dayne H. Brown, Director - North Carolina Division of Radiation Protection, a copy of the proposed license amendments.

Please refer any questions regarding this submittal to Mr. G. Honma at (910) 457-2741.

Sincerely,



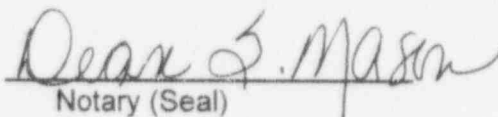
William Levis
Director — Site Operations
Brunswick Nuclear Plant

KAH/SHC/kah

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Marked-up Technical Specification Pages - Unit 1
6. Marked-up Technical Specification Pages - Unit 2
7. Typed Technical Specification Pages - Unit 1
8. Typed Technical Specification Pages - Unit 2

William Levis, 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, and agents of Carolina Power & Light Company.



Notary (Seal)

My commission expires:

My Commission Expires August 21, 1999

cc: U. S. Nuclear Regulatory Commission
ATTN.: Mr. Stewart D. Ebnetter, Regional Administrator
101 Marietta Street, N.W., Suite 2900
Atlanta, GA 30323-0199

Mr. C. A. Patterson
NRC Senior Resident Inspector - Brunswick Units 1 and 2:

U.S. Nuclear Regulatory Commission
ATTN.: Mr. David C. Trimble, Jr. (Mail Stop OWFN 14H22)
11555 Rockville Pike
Rockville, MD 20852-2738

The Honorable H. Wells
Chairman - North Carolina Utilities Commission
P.O. Box 29510
Raleigh, NC 27626-0510

Mr. Dayne H. Brown
Director - Division of Radiation Protection
North Carolina Department of Environment, Health, and Natural Resources
P.O. Box 27687
Raleigh, NC 27611-7687

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2 NRC DOCKETS 50-325 AND 50-324 OPERATING LICENSES DPR-71 AND DPR-62 REQUEST FOR LICENSE AMENDMENTS APPLICABILITY AND SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGES

Current Requirements

Specification 3.0.4 prohibits entry into an Operational Condition unless the Limiting Condition for Operation (LCO) is met without reliance on the provisions of the Action Requirements, and precludes entering an OPERATIONAL CONDITION if an LCO is not met, even if ACTION requirements would permit continued operation of the unit for an unlimited period of time. Individual Specifications note exceptions to this Specification.

Specification 4.0.3 requires that failure to perform a surveillance within the specified time interval shall constitute a failure to meet the LCO's operability requirements.

Specification 4.0.4 prohibits entry into an Operational Condition or other specified condition when surveillance requirements have not been performed within a specified time interval.

Proposed Changes

The proposed changes include the following:

1. Revised Specifications 3.0.4, 4.0.3, and 4.0.4 which are identical to the corresponding sections in the BWR/4 Standard Technical Specifications (NUREG-1433, Revision 1, April 1995), except that some terminology is adjusted to correspond with terminology in the remainder of the Brunswick Technical Specifications.
2. To prevent operator confusion the proposed revision would remove specific reference to the nonapplicability of Technical Specification (TS) 3.0.4 from TS 3/4.1.3 (Control Rods), TS 3/4.1.4 (Control Rod Program Controls), TS 3/4.3.5 (Monitoring Instrumentation), TS 3/4.7.6 (Sealed Source Contamination), TS 3/4.11.1 (Liquid Effluents), TS 3/4.11.2 (Gaseous Effluents), TS 3/4.11.3 (Solid Radioactive Waste), TS 3/4.11.4 (Total Dose [40CFR190]), TS 3/4.12.1 (Monitoring Program), TS 3/4.12.2 (Land Use Census), and TS 3/4.12.3 (Interlaboratory Comparison Program).
3. Revised Bases for Specifications 3.0.4, 4.0.3, and 4.0.4 which are identical to the corresponding Bases in the BWR/4 Standard Technical Specifications, except that some terminology is adjusted to correspond with terminology in the remainder of the Brunswick Technical Specifications.
4. Revised wording in the Unit 2 Technical Specifications Table 3.12.1-1, Notation (h), to make it consistent with the wording in Unit 1 Technical Specifications. Also included are corrections to typographical errors in Technical Specification Bases section 4.0.1 and 4.0.2.

Basis For Proposed Changes

Specification 3.0.4 states that entry into an OPERATIONAL CONDITION or other specified condition shall not be made unless the LCO is met without reliance on the provisions of the ACTION statements. This action unduly restricts facility operation when conformance to the ACTION requirements provides an acceptable level of safety for continued operation. The proposed revision to Technical Specification 3.0.4 would allow entry into an OPERATIONAL CONDITION in accordance with ACTION requirements when conformance to the ACTION requirements provides an acceptable level of safety for continued operation of the facility for an unlimited period of time. This revision is consistent with the guidance provided in NRC Generic Letter 87-09. In order to prevent operator confusion, individual exceptions to Technical Specification 3.0.4 are to be deleted, where appropriate.

Currently, Technical Specification 4.0.3 states that performance of an Surveillance Requirement within the specified time interval shall constitute compliance with the OPERABILITY requirements for an LCO and associated ACTION statements. If a Surveillance Requirement is not met as a result of failure to perform the scheduled surveillance, the LCO would not be met and the associated ACTION requirements must be entered. If the missed surveillance cannot be successfully performed during the time interval specified, a plant shutdown is usually required. It is considered overly conservative to assume that a system or component is inoperable when an Surveillance Requirement has not been performed. The proposed revision to Technical Specification 4.0.3 provides a delay of 24 hours or the length of the surveillance interval, whichever is less, to permit the completion of a missed surveillance. The 24-hour time limit balances the risks associated with an allowance for completing the surveillance against the risks associated with the potential for a plant transient and a challenge to safety systems when the alternative is a shutdown to comply with ACTION requirements before the surveillance can be completed. This change is consistent with the intent of NRC Generic Letter 87-09 and NUREG-1433.

Currently, Specification 4.0.4 prohibits entry into an OPERATIONAL CONDITION or other specified condition when Surveillance Requirements have not been performed within the specified surveillance interval. A conflict with this Specification exists when a change in OPERATIONAL CONDITION is required by shutdown ACTION requirements, since certain surveillance requirements become applicable during the shutdown that have not been performed within the specified time interval. The plant could previously have been in an OPERATIONAL CONDITION for which the Surveillance Requirements were not applicable, and thus the surveillance might not have been performed in the required interval when entering an OPERATIONAL CONDITION during shutdown. This conflict is eliminated by modifying Specification 4.0.4 to note that its provisions shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. This change is consistent with the intent of NRC Generic Letter 87-09 and NUREG-1433.

The proposed revision also incorporates modified versions of the Technical Specification Bases 3.0 and 4.0 presented in NRC Generic Letter 87-09 for Technical Specifications 3.0.4, 4.0.3, and 4.0.4. This change is consistent with the intent of NRC Generic Letter 87-09 and NUREG-1433.

In addition, The wording change in Unit 2 Technical Specification Table 3.12.1-1, Notation (h), making it consistent with the Unit 1 wording and the correction of typographical errors in the Bases section for both units are administrative changes.

References:

1. Generic Letter 87-09 dated June 4, 1987, "Sections 3.0 and 4.0 of the Standard Technical Specifications on the Applicability of Limiting Conditions for Operation and Surveillance Requirements."
2. NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 1, April 1995.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 AND 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT
APPLICABILITY AND SURVEILLANCE REQUIREMENTS

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant 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 significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and believes that its adoption would not involve a significant hazards consideration. The basis for this determination follows.

1. The proposed amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated. The operational flexibility resulting from the proposed revision to Technical Specification 3.0.4 is consistent with that allowed by the existing individual LCO and their associated ACTION requirements, which provide an acceptable level of safety for continued operation. A delay of up to 24 hours or the time of the surveillance interval, whichever is less, provided by Technical Specification 4.0.3 to complete a missed surveillance reduces the probability of a transient occurring when the affected system or component is either out of service to allow performance of the surveillance test, or there is a lower level of confidence in the operability because the normal surveillance was exceeded. The revision to Technical Specification 4.0.4 makes it clear that Technical Specification 4.0.4 does not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. The revision to the wording in Unit 2 Technical Specification Table 3.12.1-1, Notation (h), revisions to the Bases of the Technical Specifications, and the elimination of specific exemptions to Technical Specifications 3.0.4 are administrative in nature.

Based on the above, the proposed license amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendments do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed license amendments do not introduce any new equipment nor do they require any existing equipment or systems to perform a different type of function than they are presently designed to perform. The proposed changes result in improved Technical Specifications by removing unnecessary restrictions on changes in OPERATIONAL CONDITIONS and facility operation, removing unnecessary shutdowns caused by inadvertently exceeding surveillance intervals, and removing conflicts between various Technical Specifications. The revision to the wording in Unit 2 Technical Specification Table 3.12.1-1, Notation (f), revisions to the Bases of the Technical Specifications, and the elimination of specific exemptions to Technical Specification 3.0.4 are administrative in nature.

Based on the above, the proposed license amendments do not create a new or different kind of accident from any previously evaluated.

3. The proposed license amendments do not involve a significant reduction in a margin of safety. The operational flexibility that results from the proposed revision to Technical Specification 3.0.4 is consistent with that allowed by the existing individual LCO and associated ACTION requirements, which provide an acceptable level of safety for continued operation. Therefore, there is no change in the margin of safety associated with this change. A delay of up to 24 hours of the length of the surveillance interval, whichever is less, provided by Technical Specification 4.0.3 to complete a missed surveillance reduces the probability of a transient occurring when the affected system or component is either out of service to allow performance of the surveillance test, or there is a lower level of confidence in the operability because the normal surveillance was exceeded. In addition, the proposed change acknowledges that the most common outcome of the performance of a surveillance is the successful demonstration that acceptance criteria are met. The proposed change provides the potential benefit of avoiding a shutdown transient when required equipment is still capable of performing its function, and variables are still within limits. The revision to Technical Specification 4.0.4 makes it clear that Technical Specification 4.0.4 does not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. This change is considered to be a clarification to achieve consistency with existing Technical Specification requirements. The revision to the wording in Unit 2 Technical Specification Table 3.12.1-1, Notation (h), revisions to the Bases of the Technical Specifications, and the elimination of specific exemptions to Technical Specification 3.0.4 are administrative in nature.

The proposed changes would result in improved Technical Specifications and eliminate unnecessary plant challenges. Based on the above, the proposed license amendments do not involve a significant reduction in the margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 AND 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
APPLICABILITY AND SURVEILLANCE REQUIREMENTS

ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and believes that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(c), no environmental impact statement of environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows.

1. This proposed license amendments do not involve a significant hazards consideration, as shown in Enclosure 2.
2. The proposed license amendments do not result in a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite. The proposed license amendments do not introduce any new equipment nor do they require any existing equipment or systems to perform a different type of function than they are presently designed to perform. These administrative changes do not have any affect on the type or amount of effluents released during operation. Therefore, CP&L has concluded that there will not be a significant increase in the types or amounts of any effluent that may be released offsite and, as such, the proposed license amendments do not involve irreversible environmental consequences beyond those already associated with normal operation.
3. This proposed license amendments do not result in an increase in individual or cumulative occupational radiation exposure. The proposed changes do not alter safety-related equipment or impact plant operations that involve radiation exposure. As such, the proposed amendment will not alter the operational activities of plant personnel and thus will not result in an increase in individual or cumulative occupational radiation exposure.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
 NRC DOCKETS 50-325 AND 50-324
 OPERATING LICENSES DPR-71 AND DPR-62
 REQUEST FOR LICENSE AMENDMENTS
 APPLICABILITY AND SURVEILLANCE REQUIREMENTS

<u>PAGE CHANGE INSTRUCTIONS</u>	
<u>UNIT 1</u>	
Removed page	Inserted page
3/4 0-1	3/4 0-1
3/4 0-2	3/4 0-2
3/4 1-9	3/4 1-9
3/4 1-14	3/4 1-14
3/4 3-53	3/4 3-53
3/4 3-59	3/4 3-59
3/4 3-60	3/4 3-60
3/4 3-64	3/4 3-64
3/4 3-65	3/4 3-65
3/4 3-72	3/4 3-72
3/4 3-78	3/4 3-78
3/4 7-15	3/4 7-15
3/4 11-8	3/4 11-8
3/4 11-9	3/4 11-9
3/4 11-10	3/4 11-10
3/4 11-15	3/4 11-15
3/4 11-16	3/4 11-16
3/4 11-17	3/4 11-17
3/4 11-18	3/4 11-18
3/4 11-21	3/4 11-21
3/4 11-22	3/4 11-22
3/4 11-23	3/4 11-23

PAGE CHANGE INSTRUCTIONS

UNIT 1

Removed page	Inserted page
3/4 12-2	3/4 12-2
3/4 12-13	3/4 12-13
3/4 12-15	3/4 12-15
B 3/4 0-1	B 3/4 0-1
B 3/4 0-1a	B 3/4 0-2
B 3/4 0-1b	B 3/4 0-3
B 3/4 0-2	B 3/4 0-4
B 3/4 0-3	B 3/4 0-5
-	B 3/4 0-6

PAGE CHANGE INSTRUCTIONS

UNIT 2

Removed page	Inserted page
3/4 0-1	3/4 0-1
3/4 0-2	3/4 0-2
3/4 1-9	3/4 1-9
3/4 1-14	3/4 1-14
3/4 3-53	3/4 3-53
3/4 3-59	3/4 3-59
3/4 3-60	3/4 3-60
3/4 3-64	3/4 3-64
3/4 3-65	3/4 3-65
3/4 3-72	3/4 3-72
3/4 3-78	3/4 3-78
3/4 3-93	3/4 3-93
3/4 7-15	3/4 7-15
3/4 11-8	3/4 11-8
3/4 11-9	3/4 11-9
3/4 11-10	3/4 11-10
3/4 11-15	3/4 11-15
3/4 11-16	3/4 11-16
3/4 11-17	3/4 11-17
3/4 11-18	3/4 11-18
3/4 11-21	3/4 11-21
3/4 11-22	3/4 11-22
3/4 11-23	3/4 11-23
3/4 12-2	3/4 12-2
3/4 12-8	3/4 12-8
3/4 12-13	3/4 12-13
3/4 12-15	3/4 12-15

PAGE CHANGE INSTRUCTIONS

UNIT 2

Removed page	Inserted page
B 3/4 0-1	B 3/4 0-1
B 3/4 0-1a	B 3/4 0-2
B 3/4 0-1b	B 3/4 0-3
B 3/4 0-2	B 3/4 0-4
B 3/4 0-3	B 3/4 0-5
-	B 3/4 0-6

ENCLOSURE 5

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1 AND 2
NRC DOCKETS 50-325 AND 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
APPLICABILITY AND SURVEILLANCE REQUIREMENTS

MARKED-UP TECHNICAL SPECIFICATION PAGES - UNIT 1