



Carolina Power & Light Company

SERIAL: NLS-84-007

FEB 13 1985

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. 1
DOCKET NO. 50-325/LICENSE NO. DPR-71
REQUEST FOR LICENSE AMENDMENT
CORE SPRAY SYSTEM SURVEILLANCE INTERVAL EXTENSION

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. 1. The proposed TS change requests a one-time postponement of full-flow testing of the core spray pumps until the primary containment suppression chamber is restored to its operational condition.

DISCUSSION

Brunswick Unit 1 plans to shutdown during the month of March 1985 for refueling, maintenance work, and modification of the Mark I torus. In conjunction with the latter, the suppression chamber will be drained and, therefore, it will not be possible to perform the full-flow surveillance test of the Core Spray System (CSS) wherein water is recirculated into the suppression pool.

Technical Specification 4.5.3.1.c.1 states: Each CSS subsystem shall be demonstrated OPERABLE:

- c. At least once per 92 days by:
 - 1. Verifying that each CSS pump can be started from the control room and develops a flow of at least 4625 gpm on recirculation flow against a system head corresponding to a reactor vessel pressure of \geq 113 psig.

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This requirement will last be performed on or about April 1, 1985. Due to modifications being made to the suppression pool, the maximum permissible interval between full-flow tests will be exceeded. Carolina Power & Light Company is, therefore, requesting a one-time exemption to the maximum surveillance interval during the upcoming refueling outage (Reload 4) until within 48 hours after restoration of the suppression chamber to operable status, but in any case no later than October 30, 1985. Based on the present outage schedule, CP&L plans to restore the suppression chamber to operable status and perform Surveillance Requirement 4.5.3.1.c.1 by approximately August 29, 1985. This will extend the surveillance interval from the present maximum of 115 days to approximately 150 days. The October 30, 1985 date allows for contingencies in the completion of modification to the suppression pool making the maximum allowable surveillance interval 212 days.

A similar request was made by CP&L on January 10, 1984 (LAP-83-444, P. W. Howe to D. B. Vassallo) for the Brunswick Unit 2 modification of the Mark I torus. This request was subsequently approved by the NRC on May 8, 1984 (NRC letter, D. B. Vassallo to E. E. Utley).

Significant Hazards Analysis

Carolina Power & Light Company has reviewed this request and determined that extending the surveillance interval, for a full-flow test of the CSS, from 92 days to a total allowable surveillance interval of 212 days does not constitute a significant reduction in the verification of operability or the availability of this system for the following reasons:

1. Normally, in the refueling operation (OPERATIONAL CONDITION 5), the CSS is not required to be operable, (and thus to have surveillance testing performed), if all of the following conditions are met: (1) the reactor vessel head is removed, (2) the refueling cavity is flooded, and (3) the spent fuel gates are removed.

The CSS will be available for operation, if needed, during the relatively short interval when operability is required due to plant conditions (i.e., draining the refueling cavity until the suppression chamber is refilled).

2. The CSS consists of two independent subsystems, each with 100% capacity, thus providing redundant safety system subsystems.
3. Redundant systems that will be available to supply core reflood capability include the condensate system and the service water injection system, with a small volume available from the control rod drive system.
4. Surveillance is being performed every 12 hours to verify that the CSS has an operable water source (TS 4.5.3.1.a).

Surveillance is performed every 31 days to verify that the CSS is filled with water (TS 4.5.3.1.b.1).

Surveillance is performed every 31 days to verify that all valves in the CSS flow path are properly aligned (TS 4.5.3.1.b.2).

Surveillance is performed every 92 days to perform a channel calibration and to verify the setpoint of the core spray header differential pressure instrumentation (TS 4.5.3.1.c.2).

The proposed change pertaining to specification 4.5.3.1.c.1 represents a relaxation in the surveillance requirements. However, CP&L believes that adequate precautions have been taken to ensure the availability of other means of cooling for the reactor core. Therefore, the results of this change, while reducing the safety margins, are clearly within the acceptable criteria. The proposed change is similar to an example of "no significant hazards" in the guidance provided by the Commission (48 FR 14870), namely a change which "may reduce in some way a safety margin but where the results of the change are clearly within all acceptable criteria with respect to the system as specified in the Standard Review Plan." For these reasons, CP&L believes this request involves no significant hazards considerations.

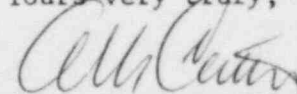
ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 TS page is provided in Enclosure 1 (CP&L reference 84TSB49). Based on the current surveillance schedule, issuance of this amendment will be required prior to June 30, 1985.

Carolina Power & Light Company has evaluated this request in accordance with the provisions of 10CFR170.12 and determined that a license amendment application fee is required. A check for \$150.00 is enclosed in payment of this fee.

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

Yours very truly,

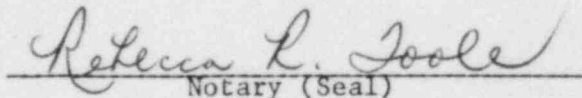


A. B. Cutter - Vice President
Nuclear Engineering & Licensing

HS/crs (1024NLU)
Enclosure

cc: Dr. J. Nelson Grace (NRC-R11)
Mr. D. O. Myers (NRC-BNP)
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:

My Commission Expires 6-8-86