



Carolina Power & Light Company

APR 23 1986

SERIAL: NLS-86-124
84TSB46

Director of Nuclear Reactor Regulation
Attention: Mr. Dan Muller, Director
BWR Project Directorate #2
Division of BWR 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
CONTROL ROD WITHDRAWAL BLOCK INSTRUMENTATION

Dear Mr. Muller:

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 Nos. 1 and 2. The proposed amendment revises TS Table 3.3.4-1.

DISCUSSION

Currently, TS Table 3.3.4-1 indicates that control rod withdrawal block is not initiated on "detector not full in" for the Intermediate Range Monitors (IRM) when the IRM channel indicators are in range position 1. However, this is contrary to actual plant configuration and operation; control rod withdrawal block is initiated when the IRM detectors are not full in regardless of which range position the indicators are set to. Therefore, the proposed TS change deletes footnote (e) from Item 4.a of Table 3.3.4-1. In addition, symbolic footnote annotation is changed to alphabetic.

SIGNIFICANT HAZARDS ANALYSIS

The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). 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. CP&L has evaluated this request and determined that:

- (1) The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because the control rod withdrawal block function will continue to be accomplished under conditions currently described in the TS. In addition, control rod withdrawal block will also be accomplished for the IRM detector not full in feature when the IRM channel

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indicators are in range position 1. This represents an additional restriction on operation of the plant and as such decreases the probability of an accident occurring. The footnote annotation change is an administrative change which has no impact on the probability or consequences of an accident.

- 2) The proposed amendment does not create a new or different kind of accident from any accident previously evaluated for the same reasons as stated in item 1.
- 3) The proposed amendment does not involve a significant reduction in a margin of safety because the removal of the bypass function from the TS provides for more restrictive operation of the plant by expanding the operating conditions for control rod block. The footnote annotation change is an administrative change which has no impact on a margin of safety.

Based on the above, CP&L has determined that the proposed amendment meets the criteria of 10 CFR 50.92(c) and, therefore, does not involve significant hazards consideration.

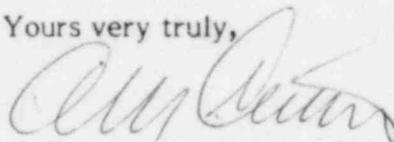
ADMINISTRATIVE INFORMATION

The proposed Brunswick-1 and Brunswick-2 pages are provided in Enclosures 1 and 2.

CP&L has evaluated this request in accordance with the provisions of 10 CFR 170.12 and has determined that a license amendment application fee is required. A check for \$150 is enclosed in payment of this fee.

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

Yours very truly,



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

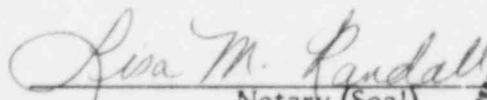
ABC/RWS/pgp (3670RWS)

Enclosures

cc: Mr. Dayne H. Brown W/A
Mr. W. H. Ruland (NRC-BNP) W/A
Dr. J. Nelson Grace (NRC-RII) W/A
Mr. E. D. Sylvester (NRC) W/A

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.

My commission expires: 5/18/88


Notary (Seal)

