



Carolina Power & Light Company

FEB 19 1986

SERIAL: NLS-86-028

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  
TURBINE STOP VALVES

Dear Mr. Muller:

**SUMMARY**

As a result of discussions with members of your staff, Carolina Power & Light Company (CP&L) has determined that a clarification to our proposed technical specification (TS) amendment to the turbine stop valve surveillance requirements is necessary. In our letter of May 6, 1985, CP&L provided a discussion of the reasons for requesting the change. The purpose of this letter is to clarify that discussion. In addition, the significant hazards analysis has been revised to conform with current guidance. The discussion and significant hazards analysis provided in this letter supersede those of our May 6, 1985 submittal.

**DISCUSSION**

Under the existing TS requirements (Item 9 for stop valves and 10 for control valves of TS Table 4.3.1-1), the closure and fast closure features of the turbine stop and control valves must be tested once per month while in Operational Condition 1. In order to meet the requirements of TS 4.0.4, these features must also be tested prior to entering Operational Condition 1. Performance of these surveillances causes large power swings (100 to 180 Mw at full power) and significant thermal cycling of the plant systems. Since the intermediate range monitors (IRM) are not bypassed while in Operational Condition 2, a high IRM scram is likely to occur due to a pressure transient if performed in Operational Condition 2. In Operational Conditions 3 or 4, the system configuration to perform the surveillance is complex and/or requires the use of jumpers. Therefore, it is advantageous to perform the required surveillance in Operational Condition 1 when the IRMs are bypassed, but prior to 30-percent power.

The proposed amendment changes the surveillance specification to require monthly testing while above 30-percent thermal power. This power level is consistent with Table 3.3.1-1 which indicates that these closure features are bypassed while below 30-percent power. Testing will be done prior to exceeding 30-percent power to

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fulfill the requirements of TS 4.0.4 and monthly thereafter while above 30-percent power. Should power be less than 30 percent when the test falls due, TS 4.0.4 requires completion of testing prior to increasing power above 30 percent.

### SIGNIFICANT HAZARDS ANALYSIS

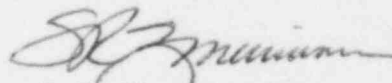
The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment 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. Carolina Power & Light Company has reviewed 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 there is no physical alteration of the plant configuration or changes to setpoints or operating parameters. The change merely removes surveillance requirements on the turbine stop valves when they are bypassed. This is consistent with TS Table 3.3.1-1 which indicates that the closure and fast closure features of the turbine stop valves are bypassed while below 30-percent rated thermal power.
2. The proposed amendment does not create the possibility of 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 it is consistent with plant configuration as reflected in TS Table 3.3.1-1 and normal operating procedures as defined in Specifications 4.0.3 and 4.0.4. The closure and fast closure functions of the turbine stop valves are bypassed until exceeding 30 percent of rated thermal power. Specification 4.0.3 states that surveillance requirements do not have to be performed on inoperable equipment. The proposed footnote defines closure function operability, thereby allowing the required surveillance to be performed in Operational Condition 1 and still fulfill the requirements of Specification 4.0.4.

Based on the above reasoning, CP&L has determined that the proposed amendment does not involve a significant hazards consideration.

Please refer any further questions regarding this matter to Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,



S. R. Zimmerman  
Manager

Nuclear Licensing Section

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cc: Mr. W. H. Ruland (NRC-BNP)  
Dr. J. Nelson Grace (NRC-R11)  
Mr. E. Sylvester (NRC)