Docket Nos. 50-325/324

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LICENSEE:	Carolina	Power	and	Light	Company		

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PD#2 Reading MGrotenhuis SNorris DMuller. EJordan NRC Participants FACILITY: Brunswick Steam Electric Plant Units 1 and 2 (BSEP) BGrimes JPartlow | OELD ACRS(10)

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Background:

SUBJECT:

Five licensing issues were discussed with CP&L staff. The issue and the background for each are as follows:

SUMMARY OF MEETING HELD ON JANUARY 14, 1986.

TO DISCUSS LICENSING ISSUES

- 1. Hydrogen Recombiner Capability (Nitrogen Switchover System): This meeting supplements the meeting held on November 8, 1985 (Meeting Summary dated November 22, 1985). The open issue involved is CP&L compliance with criterion 2 of the May 8, 1984 Generic Letter 84-09. The staff interpretation of criterion 2 is that all sources of oxygen inside containment be eliminated. Because of a difference in interpretation of criterion 2 the licensee has proposed an instrument air system which switches over to an instrument nitrogen system upon reciept of a loss of coolant accident (LOCA) signal. Since this is not consistent with the staff interpretation of criterion 2, compensatory measures have been requested of the licensee. The meeting of November 8, 1985 was adjourned with the understanding that CP&L would evaluate compensatory actions that could be taken. Attendees are listed in Attachment 1.
- 2. Safety Parameter Display System (SPDS): The SPDS is the last item to be completed in order for the Emergency Response Facilities (ERF) to be completely operational by 1989. The BSEP schedule for completion of the SPDS is 1989 and 1988 respectively for Unit 1 and Unit 2. This meeting was convened to discuss the reasons for the delay in completion of the ERF. Attendees are listed in Attachment 2.
- Integrated Schedule: On August 20, 1985, an integrated schedule 3. was submitted for BSEP. This August schedule was acceptable in all aspects expect for Appendix R, the SPDS and environmental qualification (EQ). On November 15, 1985, the EQ issue was resolved by a Commission Order denying an extension of time to complete EQ. The Appendix R issue will be resolved by issuance of a Safety Evaluation. The only issue remaining before the integrated schedule can be found acceptable by the staff is the SPDS. The schedule was amended to account for Unit 2 refueling outage change. This meeting was convened to discuss the change. Attendees are listed in Attachment 3.

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- 4. Excess Flow Check Valve Relief: On May 2, 1985, CP&L proposed alternate testing for the Reactor Instrument Prrtection (RIP) system and the excess flow check valves associated with this system. Supplemental information was provided on July 5, 1985, and a test was observed at the site by NRC staff on December 5, 1985. (See Meeting Summary dated December 17, 1985). This meeting was convened to discuss the remaining documentation required before the relief can be granted. Attendees are listed in Attachment 4.
- 5. Appendix J Exemption Request: On October 25, 1985, CP&L requested an exemption from type C testing for certain valves. Supplemental information was provided by letter dated December 20, 1985. The purpose of this meeting was to discuss the H<sub>2</sub>/O<sub>2</sub> monitors and details of the valves for which exemption was requested. Attendees are listed in Attachment 5.

Meeting Summary:

1. Hydrogen Recombiner Capability (Nitrogen Switchover System).

As indicated in the meeting of November 8, 1985, (Summary dated November 22, 1985), CP&L was to evaluate compensatory measures. No suitable compensatory measures were identified by CP&L so a Probabilistic Risk Assessment (PRA) study was done as the basis for acceptance of the proposed Nitrogen Switchover System. An overview of this study was reported to the staff in this meeting. After discussing the issue as some length with CP&L the staff concluded that CP&L must meet the criteria in Generic Letter 84-09 or provide assurance that equivalent protections is provided. The staff agreed to review a submittal by CP&L providing details of the PRA study as a basis for concluding that equivalent protection was provided. This study should include a break in the instrument air line caused by the LOCA. In addition. the cost of literal compliance with criterion 2, i.e., installation of an instrument system that uses a nitrogen supply or takes suction from the drywell atmosphere, should be included in this submittal. This study will be submitted 30 days from issuance of this summary.

2. Safety Parameter Display System (SPDS)

CP&L provided an overview of the Integrated Schedule relative to the progress and status of the SPDS. They explained in detail why the SPDS, and thus the ERF, requires as long as it does to be completed in an orderly and practical manner. The feasibility and the effect of compressing the schedule, i.e., requiring the SPDS to be completed one outage earlier (i.e. about 1987 and 1986, the current outage for Unit 2) was also discussed. The staff concluded that in order for the proposed schedule for the SPDS and the ERF to be acceptable CP&L would be required to provide as a basis, the following information:

- a. An explanation of the circumstances that led to the late schedule for the SPDS completion.
- b. A cost-benefit evaluation of the SPDS schedule. This should include what measure of safety can be gained if the SPDS completion is earlier by one refueling outage and the cost, both economic and other, of providing the SPDS one outage sooner.
- c. Assurance that the current schedule could and would be met.
- d. Justification for completion of the SPDS on the proposed schedule. This information will be submitted 45 days from issuance of this summary.
- 3. Integrated Schedule

CP&L presented a new schedule and discussed the changes that were made since the August 20, 1985 submittal. As indicated, all aspects of the schedule have been accounted for except the SPDS. Item No. 2 of this meeting summary discusses that issue and the path for resolution. The new schedule will be submitted formally within 30 days from the date of this summary.

4. Excess Flow Check Valve Relief

The licensee provided a draft of proposed additional information for discussion purposes. The staff will provide guidance as to the additional information required to complete the review in 30 days.

5. Appendix J Exemption Request

The licensee provided background information concerning the design and leak experience with the  $H_2/O_2$  monitor system and the valves for which exemption was requested. This information will be provided by the licensee in another submittal. The information required to complete the review should include (1) the verification that the piping is seismic Category 1, (2) a description of the quality group of the piping, (3) leak prevention characteristics and test history of the system, and (4) additional justification for the relief in terms of the

difficulties of doing the type C tests. This information will be provided within 30 days from the date of this summary.

Original signed by M.J.

Ernest D. Sylvester, Project Manager BWR Project Directorate #2 Division of BWR Licensing

Attachments: As stated

cc w/attachments: See next page

DBL:PD#2 SNorris:rc fr ESylvester 02/8 /86 02/15/86

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Dayne H. Brown, Chief Radiation Protection Branch Division of Facility Services Department of Human Resources Post Office Box 12200 Raleigh, North Carolina 27605 Hydrogen Recombiner Nitrogen Switchover

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K. Eckleston	NRC
M. Grotenhuis	NRC
E. Sylvester	NRC
A. B. Cutter	CP&L
R. W. Schrauder	CP&L
S. R. Zimmerman	CP&L
G. Oliver	CP&L
V. Wagoner	CP&L

## Intergrated Schedule

Μ.	Grotenhuis	NRC
Ε.	Sylvester	NRC
Α.	B Cutter	CP&L
R.	W. Schrauder	CP&L
s.	R. Zimmerman	CP&L
G.	Oliver	CP&L
۷.	Wagner	CP&L

### Attachment 4

# Reactor Instrument Protection System

Μ.	Grotenhuis	NRC
Ε.	Sylvester	NRC
R.	W. Schrauder	CP&L
R.	M. Poulk, Jr.	CP&L
s.	R. Zimmerman	CP&L
J.	Page	NRR

### Attachment 5

## Appendix J. Exemption Request

## Attendees

Μ.	Grotenhuis	NRC
Ε.	Sylvester	NRC
R.	W. Schrauder	CP&L
R.	M. Poulk, Jr.	CP&L
۶.	R. Zimmerman	CP&L
J.	Lane	NRR

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