

CP&L

Carolina Power & Light Company

SEP 19 1988

SERIAL: NLS-88-174
10CFR50.90
88TSB18

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
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
DRYWELL - SUPPRESSION CHAMBER VACUUM BREAKER ACTIONS

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 a revision to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2.

The proposed change revises the actions associated with Technical Specification 3/4.6.4 to clarify the alternative actions to be taken if the existing actions cannot be taken. To do this, existing Action 3/4.6.4.d is being incorporated into Actions 3/4.6.4.a, 3/4.6.4.b, and 3/4.6.4.c, and being deleted as a separate action.

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 instructions for incorporation of the proposed changes into the Technical Specifications for each unit.

Enclosure 4 provides a summary of the proposed Technical Specification changes for each unit on a page by page basis.

Enclosures 5 and 6 provide the proposed Technical Specification pages for each unit.

In accordance with the requirements of 10CFR170.12, a check for \$150 is also enclosed.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendments, once approved by the NRC, be issued with an

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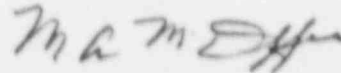
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effective date to be no later than 60 days from the issuance of the amendment.

Please refer any questions regarding this submittal to Mr. Stephen D. Floyd at (919) 836-6901.

Yours very truly,



M. A. McDuffie
Senior Vice President
Nuclear Generation

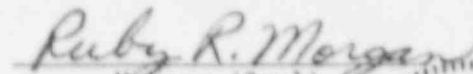
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Enclosures:

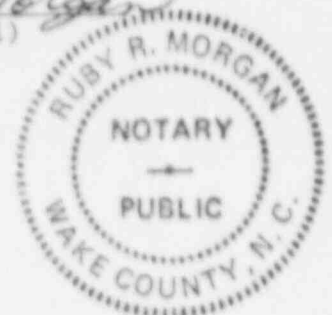
1. Basis for Change Request
2. 10CFR50.92 Evaluation
3. Instructions for Incorporation
4. Summary List of Revisions
5. Unit 1 Technical Specification Pages
6. Unit 2 Technical Specification Pages

cc: Mr. Dayne H. Brown
Dr. J. Nelson Grace
Mr. W. H. Ruland
Mr. B. C. Buckley

M. A. McDuffie, 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: 11/27/89



ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT

BASIS FOR CHANGE REQUEST

Proposed Change

Incorporate the requirements of Action 3.6.4.1.d into each of the previous Actions, 3.6.4.1.a, 3.6.4.1.b, and 3.6.4.1.c, and delete existing Action 3.6.4.1.d.

Basis

Technical Specification 3.6.4.1 requires that all drywell-suppression chamber vacuum breakers be OPERABLE and in the closed position with the position indicator OPERABLE, and an opening setpoint of ≤ 0.5 psid. This requirement applies in Operational Conditions 1, 2, and 3.

There are currently four action statements associated with Technical Specification 3.6.4.1. Action 3.6.4.1.a applies if no more than two drywell-suppression chamber vacuum breakers are inoperable for opening but are known to be in the closed position. Operation may continue until the next cold shutdown provided that Surveillance Requirement 4.6.4.1.a, which requires that each vacuum breaker be exercised through one complete cycle and verified closed, is performed on the operable vacuum breakers within 4 hours and at least once per 15 days thereafter until the inoperable vacuum breakers are restored to operable status.

Action 3.6.4.1.b applies if one drywell-suppression chamber vacuum breaker is in the open position, as indicated by the position indicating system. Operation may continue provided that Surveillance Requirement 4.6.4.1.a, which requires that each vacuum breaker be exercised through one complete cycle and verified closed, is performed on the operable vacuum breakers and Surveillance Requirement 4.6.4.1.b, which requires that a test be conducted that verifies that the differential pressure is maintained greater than 1/2 of the initial differential pressure for one hour without nitrogen makeup, is performed within 8 hours and at least once per 72 hours thereafter until the inoperable vacuum breaker is restored to the closed position.

Action 3.6.4.1.c applies if the position indicator of any drywell-suppression chamber vacuum breaker is inoperable. Operation may continue provided that Surveillance Requirement 4.6.4.1.b, which requires that a test be conducted that verifies that the differential pressure is maintained greater than 1/2 of the initial differential pressure for one hour without nitrogen makeup, is performed within

8 hours and at least once per 72 hours thereafter until the inoperable position indicator is returned to Operable status.

Action 3.6.4.1.d states, "Otherwise, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours."

The intent of Action 3.6.4.1.d is to provide alternate action requirements if the requirements specified in Action 3.6.4.1.a, 3.6.4.1.b, or 3.6.4.1.c cannot be met. For example, if the circumstances described in Action 3.6.4.1.a apply but Surveillance Requirement 4.6.4.1.a cannot be performed on the vacuum breakers within 4 hours, Action 3.6.4.1.d applies. Likewise, if the circumstances described in Action 3.6.4.1.b apply but Surveillance Requirements 4.6.4.1.a and 4.6.4.1.b cannot be performed in the specified time, Action 3.6.4.1.d applies.

The way in which the existing actions are listed could imply that if the circumstances of Actions 3.6.4.1.a, 3.6.4.1.b, or 3.6.4.1.c do not apply, then Action 3.6.4.1.d should be taken instead of following the requirements of Technical Specification 3.0.3, which requires that the unit be placed in at least hot shutdown within 6 hours and in cold shutdown within the following 30 hours unless corrective measures are completed that permit operation under the permissible action statements. Or, the existing actions could imply that Technical Specification 3.0.3 applies if the requirements of Actions 3.6.4.1.a, 3.6.4.1.b, or 3.6.4.1.c cannot be met.

The proposed change will eliminate confusion over the interpretation of Technical Specification 3.6.4.1 action statements. The requirement described in Action 3.6.4.1.d will be included in each of the previous Action statements, 3.6.4.1.a, 3.6.4.1.b, and 3.6.4.1.c, so that it is clear that the alternative action is not Technical Specification 3.0.3, but to be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT

10CFR50.92 EVALUATION

The Commission has provided standards in 10CFR50.92(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 determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change

Incorporate the requirements of Action 3.6.4.1.d into each of the previous Actions, 3.6.4.1.a, 3.6.4.1.b, and 3.6.4.1.c, and delete existing Action 3.6.4.1.d.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed change clarifies the existing requirement of Technical Specification 3.6.4.1. It does not impact plant equipment or design; it only provides a clearer statement of the actions to be taken if Technical Specification 3.6.4.1 cannot be met, thereby providing assurance that the proper actions are taken when necessary. The probability of an accident is not increased because the requirement of Technical Specification 3.6.4.1 and its actions have not changed; the actions have only been clarified. The same is true for the consequences of an accident; they have not changed because the requirements of Technical Specification 3.6.4.1 and its actions have not changed.
2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated because the requirements of Technical Specification 3.6.4.1 and its actions have not changed. The proposed change requires that if Actions 3.6.4.1.a, 3.6.4.1.b, or 3.6.4.1.c cannot be met, the unit must be in hot shutdown within 12 hours and in cold shutdown

within the next 24 hours, just as Technical Specification 3.6.4.1 and its actions currently require.

3. The proposed amendment only clarifies the existing requirement of Technical Specification 3.6.4.1 and its actions. It does not change the design or operation of plant equipment, nor does it change the intent of any requirements provided in the Technical Specifications. Therefore, it does not involve a significant reduction in the margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT

INSTRUCTIONS FOR INCORPORATION

The proposed changes to the Technical Specifications (Appendix A to Operating Licenses DPR-71 and DPR-62) would be incorporated as follows:

UNIT 1

Remove Page

3/4 6-18

Insert Page

3/4 6-18

UNIT 2

Remove Page

3/4 6-18

Insert Page

3/4 6-18

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT

SUMMARY LIST OF REVISIONS

UNIT 1

| <u>Pages</u> | <u>Description of Changes</u> |
|--------------|---|
| 3/4 6-18 | Move the requirements described in Action 3.6.4.1.d into Actions 3.6.4.1.a, 3.6.4.1.b, and 3.6.4.1.c and delete Action 3.6.4.1.d. |

UNIT 2

| <u>Pages</u> | <u>Description of Changes</u> |
|--------------|---|
| 3/4 6-18 | Move the requirements described in Action 3.6.4.1.d into Actions 3.6.4.1.a, 3.6.4.1.b, and 3.6.4.1.c and delete Action 3.6.4.1.d. |