



Carolina Power & Light Company

P O Box 1551 • Raleigh, N. C. 27602

MAY 18 1988

R. B. RICHEY, Manager
Licensing & Nuclear
Fuel Department

SERIAL: NLS-88-120

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
FUEL EXPOSURE LIMIT

Gentlemen:

On April 8, 1988, the Nuclear Regulatory Commission issued Amendment No. 149 to the operating license for the Brunswick Steam Electric Plant, Unit 2 (BSEP-2). In this amendment, the NRC added a footnote to each of the MAPLHGR figures which limits the maximum average fuel bundle burn-up to 33,000 MWD/MT. This limit was imposed due to the need for the NRC Staff to further evaluate the impacts associated with the transportation of high exposure spent fuel.

The current BSEP-2 fuel cycle (Cycle 8), through the use of new GE fuel types, is designed to be capable of operation to batch average exposures of 38,000 MWD/MT. The exposure limit imposed by the NRC, if not lifted, will potentially force an early shutdown of BSEP-2.

Carolina Power & Light Company is already involved in the design of the next reload core for BSEP-2 Cycle 9. Under the terms of the Company's contract for the design of the reload core, the Company must provide General Electric Company with the final design criteria for the BSEP-2 Cycle 9 core design no later than June 6, 1988. Therefore, this Technical Specification limit will impose a severe economic penalty on CP&L if the NRC does not promptly resolve this issue. This economic penalty may ultimately exceed \$4 million due to the need for re-design of the BSEP-2 Cycle 9 core and the procurement of additional fuel assemblies. I urge you to take actions necessary to remove this fuel exposure limit as soon as possible.

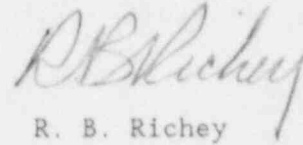
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Please refer any questions regarding this submittal to Mr. Stephen D. Floyd at (919) 836-6901.

Yours very truly,

A handwritten signature in cursive script, appearing to read "R. B. Richey".

R. B. Richey

WRM/wrm (\cor\flimit)

cc: Dr. J. Nelson Grace
Mr. W. H. Ruland
Mr. E. D. Sylvester