



Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

JUN 13 1988

LYNN W. EURY
Senior Vice President
Operations Support

SERIAL: NLS-88-117
10CFR50.90
87TSB02

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
RADIOACTIVE EFFLUENT MONITORING INSTRUMENTATION

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 changes to Technical Specifications 3.3.5.8 and 3.3.5.9 clarify the limiting conditions for operation by simplifying the options available when a monitoring instrument is found with a non-conservative alarm/trip setpoint.

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.

Enclosure 5 provides the proposed Technical Specification pages for Unit 1.

Enclosure 6 provides the proposed Technical Specification pages for Unit 2.

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

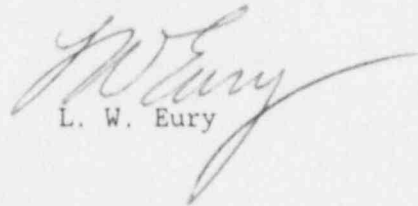
8806200197 880613
PDR ADOCK 05000324
P DCI

Aug 1
w/ check #150
#995951

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 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) 236-6901.

Yours very truly,


L. W. Eury

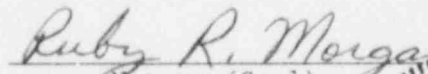
BAB/bab(\cor\87tsb02)

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. E. D. Sylvester

L. W. Eury, 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

Delete the phrase "or change the setpoint so it is acceptably conservative" from Action Statements 3.3.5.8.a and 3.3.5.9.a.

Basis

The radioactive liquid and gaseous effluent monitoring instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid and gaseous effluents during actual or potential releases of such effluents. The alarm/trip setpoints are calculated in accordance with the Offsite Dose Calculation Manual to ensure that the alarm/trip will occur prior to exceeding the limits of 10CFR50 Part 20.

Currently, three options are described in Technical Specifications 3.3.5.8 and 3.3.5.9 for dealing with a monitoring instrument which is found with a non-conservative alarm/trip setpoint:

- (1) Immediately suspend the effluent release monitored by the channel,
- (2) Declare the channel inoperable, or
- (3) Change the setpoint so it is acceptably conservative.

The proposed change deletes the third action option, thereby focusing attention on either immediate suspension of releases or declaration of the instrument as inoperable. By declaring the instrument inoperable, the operator follows the action statement requirements for an inoperable instrument, which requires suspension of releases unless samples are periodically taken to show that the appropriate limits are not being violated. The action statements describe acceptable short-term corrective actions and are not intended to describe specific long-term corrective actions, such as restoration of the non-conservative setpoint to an acceptable value. Restoration of the required function to the "normal" condition is always an available, and preferable, option. However, in problem situations, main concern lies with environmental safety, and the short term actions will provide immediate protection.

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

Delete the phrase "or change the setpoint so it is acceptably conservative" from Action Statements 3.3.5.8.a and 3.3.5.9.a.

Basis

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

1. Elimination of the short term option to correct a setpoint found to be non-conservative focuses attention on the two remaining options which provide immediate actions to preclude any unwarranted radiation releases via the liquid or gaseous effluent pathways. Restoration of the non-conservative setpoint to an acceptable value remains a viable long-term option; however, in the short term, the more immediate actions provided to preclude releases will be considered first, thereby reducing the possibility that harmful effluents will be released while the problem is being evaluated. Thus, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. This change will provide for immediate mitigative action if an effluent monitoring instrumentation setpoint is found to be non-conservative, thereby precluding unwarranted effluent release. No new or different types of accidents become possible since deleting the statement "or change the setpoint so it is acceptably

conservative" focuses attention on mitigating potential accidents already evaluated rather than on recalibration of the instrument.

3. Attention will be focused on immediate actions to be taken if setpoints are found to be non-conservative. This could provide a quicker operator response and, therefore, less potential for release of harmful effluents. Therefore, the proposed amendment 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 3-62
3/4 3-68

Insert Page

3/4 3-62
3/4 3-68

UNIT 2

Remove Page

3/4 3-62
3/4 3-68

Insert Page

3/4 3-62
3/4 3-68

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 3-62	Delete "or change the setpoint so it is acceptably conservative" and add "or" to the statement prior to that.
3/4 3-68	Delete "or charge the setpoint so it is acceptable conservative."

UNIT 2

<u>Pages</u>	<u>Description of Changes</u>
3/4 3-62	Delete "or change the setpoint so it is acceptably conservative" and add "or" to the statement prior to that.
3/4 3-68	Delete "or change the setpoint so it is acceptable conservative."