



Carolina Power & Light Company

MAR 06 1989

SERIAL: NLS-89-056

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
OPERATIONAL CONDITION TABLE FOOTNOTE
CLARIFICATION LETTER
(NRC TAC Nos. 71108/71109)

Gentlemen:

By letter dated October 28, 1988, Carolina Power & Light Company (CP&L) requested a revision to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2. The proposed change would revise Footnote *** associated with Table 1.2 on page 1-10 from "...while a single control rod is being recoupled..." to "...while a single control rod is being moved..."

Part of the basis for the proposed change states that control rod testing and control rod recoupling both involve essentially the same rod movements; from full-in to full-out, or full-out to full-in. Control rod recoupling involves a single notch insertion of the rod followed by a full withdrawal to verify recoupling. Control rod testing involves recording the time taken for the control rod to be withdrawn from full-in to full-out and from full-out to full-in. These control rod tests must be performed on each of the 137 control rods in the core prior to start-up following each refueling outage.

At the Brunswick Plant, control rod recoupling and friction testing of control rods are completed prior to performing Periodic Test (PT)-14.2.1, "Single Rod Scram Insertion Times Test." The prerequisite for performing PT-14.2.1 requires that PT-90.2, "Friction Testing of Control Rods," be completed for the 137 control rods. PT-90.2 requires verification that timing in accordance with Operating Procedure (OP)-08 (to verify that there is not excessive friction within the movement range of the control rod) has been completed for control rods that require venting and timing.

In addition, Operating Procedure (OP)-07, "Reactor Manual Control System Operating Procedure" requires that coupling integrity of a control rod be verified anytime a control rod is fully withdrawn. This is accomplished by verifying that the control rod does not reach the overtravel position (refer to Technical Specification 3/4.1.3).

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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In addition to the Periodic Tests and Operating Procedures discussed above, which specify that control rod coupling and friction testing be completed prior to scram time testing, there is an independent Periodic Test that also verifies and documents the same data. PT-14.1A, "Control Rod Coupling Check and CRD Testing," whose primary purpose is to collect data for the 137 control rods, states as its acceptance criteria that the test is satisfactory when the following criteria are met:

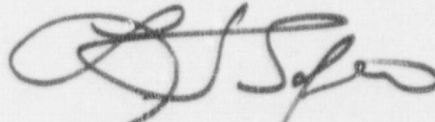
- 6.0.1.1 all control rods which could have been affected by core alterations or have been withdrawn by this procedure have their coupling integrity verified by observing the drive does not go to the overtravel position when fully withdrawn.
- 6.0.1.2 withdraw and insert times are between 43 & 53 seconds.
(These times verify that there is no excessive friction in the control rod movement.)

PT-14.1A can be performed concurrent with PT-90.2.

Based on the procedures described above, adequate assurance is provided that a control rod will not be uncoupled or experience excessive friction during single rod scram insertion time testing.

Please refer any questions regarding this submittal to Mr. Stephen D. Floyd at (919) 546-6901.

Yours very truly,



Leonard I. Loflin
Manager
Nuclear Licensing Section

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cc: Mr. S. D. Ebnetter
Mr. W. H. Ruland
Mr. E. G. Tourigny