



Carolina Power & Light Company

SERIAL: NLS-89-105
10CFR50.90
87TSB26

MAY 05 1989

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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
INSTRUMENT TAG NUMBER DELETION TECHNICAL SPECIFICATION CHANGE
(NRC TAC NOS. 72061 AND 72062)

Gentlemen:

Carolina Power & Light Company (CP&L) submitted a request for license amendment for the Brunswick Steam Electric Plant, Units 1 and 2 on February 1, 1989 to delete instrument tag numbers from the Technical Specifications. On March 9, 1989, the NRC Project Manager requested that several changes be made to the February 1, 1989 submittal. The changes to Enclosure 1 of the February 1, 1989 submittal, along with others identified by CP&L, have been made and are provided in the enclosures to this letter. As discussed with the NRC Project Manager on April 10, 1989, any changes made to the Technical Specification pages will be submitted at a later date.

Each of these changes has been evaluated with respect to 10CFR50.92 and, if necessary, changes to the significant hazards analyses for each change have been provided.

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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Enclosures:

1. Description of Changes Made to Enclosure 1 of February 1, 1989 Letter
2. Replacement Pages to Enclosure 1 of February 1, 1989 Letter

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

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ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
INSTRUMENT TAG NUMBER DELETION TECHNICAL SPECIFICATION CHANGE

DESCRIPTION OF CHANGES MADE TO
ENCLOSURE 1 OF FEBRUARY 1, 1989 LETTER

<u>CHANGE NUMBER</u>	<u>DESCRIPTION</u>
3	Add a statement to the basis for the change to state that changes to the list of instrument tag numbers provided in the FSAR will be controlled under 10CFR50.59, and that changes to the list of tag numbers provided in Plant Procedure RCI-02.6 will be handled through CP&L's procedure review process.
6	Revise the basis for the change to state that Section 3/4.3 will be repaginated.
9	Revise the references to Footnote (i) to Footnote (h) and add a reference to Footnote (b) for Table 3.3.2-2.
10	Add a statement to the 10CFR50.92 evaluation to state that the surveillance was completed prior to the end of the Spring, 1981 outage.
11	Revise the references to Footnote # to Footnote ##, and existing Footnote ## to Footnote ###.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
INSTRUMENT TAG NUMBER DELETION TECHNICAL SPECIFICATION CHANGE
REPLACEMENT PAGES TO ENCLOSURE 1 OF FEBRUARY 1, 1989 LETTER

Proposed Change Number 3

Delete instrument tag numbers throughout the Technical Specifications.

Basic

The proposed change deletes references to instrument tag numbers throughout the Technical Specifications. Changes to the instrument tag numbers listed in the FSAR will be controlled through 10CFR50.59. In addition, Plant Procedure RCI-02.6 will include a list of the tag numbers and revision to that list will be handled through CP&L's procedure review process which addresses unreviewed safety questions. This change is being handled as an administrative change since it involves deletion of information not required to be in the Technical Specifications. The Standard Technical Specifications (STS) for General Electric boiling water reactors list only instrument function; they do not provide the specific tag numbers of the instruments associated with each function.

Originally, BSEP included the instrument tag numbers in its Technical Specifications because it was thought the presence of the instrument tag numbers in the Technical Specifications would be beneficial to the plant operators. Since that time, it has taken a great deal of effort by both CP&L and the NRC to keep the instrument numbers updated in the Technical Specifications through the license amendment process. As a result, CP&L has determined that it would be more efficient and beneficial to the operators to handle the instrument tag numbers procedurally and remove them from the Technical Specifications. Such a change would allow maintenance of more current information for the operator, thus enhancing safety, and it could also result in two or more less Technical Specification amendment requests per year, thereby reducing both NRC and CP&L workload without having a negative impact on the safety of the plant.

10CFR50.92 Evaluation

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

1. The proposed change does not involve a change in the design, operation or testing of any plant system. It deletes information not required to be included in the Technical Specifications, thereby potentially reducing both NRC and CP&L administrative effort involved in keeping the Technical Specifications updated. No new equipment will be installed; nor will any new or different operational modes be created. The instrument tag numbers will be addressed in plant procedures and updated there as necessary. The tag number lists will be adequately controlled through 10CFR50.59 and the plant procedure review process. Therefore, this change has no effect on the probability of an accident, nor does it impact the consequences of any accident previously evaluated.

2. The proposed change deletes information not required to be addressed in the Technical Specifications. It does not reflect a change to the design, operation or testing of plant equipment; it only administratively deletes the instrument tag numbers from the Technical Specifications. The instrument tag numbers will be maintained and updated in the plant procedures. Therefore, no new or different accident possibilities are created.

3. The proposed change has no effect on the design or operation of any plant system. It only deletes references to instrument tag numbers for the Technical Specifications. The instrument tag numbers are not required to be incorporated in the Technical Specifications, and it takes a great deal of effort for both the NRC and CP&L to keep the information updated. The instrument tag numbers will be handled and updated via plant procedures, thereby potentially eliminating the need for several Technical Specification amendment requests per year. Therefore, since the information will continue to be maintained, only in a different form, there is no impact on the margin of safety of the plant.

Proposed Change Number 6

Repaginate to accommodate tag number deletions.

Basis

The proposed change repaginates existing pages to accommodate deletion of information on previous pages, and to eliminate "a" pages.

10CFR50.92 Evaluation

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

1. The proposed change is administrative in nature. It has no impact on the design or operation of any safety system; it only repaginates the affected section of the Technical Specifications to accommodate deletions on previous pages and to eliminate "a" pages. Therefore, the proposed change does not have any affect on the probability or consequences of any accident previously evaluated.
2. The proposed change is administrative in nature. It's only purpose is to repaginate a section of the Technical Specifications where information is being deleted, which is addressed by other proposed changes provided elsewhere in this submittal. Therefore, it does not create the possibility of a new or different kind of accident.
3. Repagination of this section has no bearing on the design or operation of any system. It is purely administrative. Thus, it does not impact the margin of safety of the plant.

Proposed Change Number 9

Delete Footnotes (b), (7) and (h).

Basis

Footnotes (b), (7) and (h) were added to the Technical Specifications via Amendment 131 on December 10, 1986 to support the hydrogen injection test which took place in January 1987. This was a one-time test; therefore, the footnotes are no longer applicable or necessary for normal operation.

10CFR50.92 Evaluation

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

1. The proposed change deletes a footnote which no longer applies. The footnote was added to support a one-time, hydrogen injection test, which was completed on January 5, 1987. No additional testing is planned. Thus, the proposed change has no effect on the probability of an accident, nor does it affect the consequences of any accidents.
2. The referenced footnote no longer applies to BSEP-2. The hydrogen injection test was successfully completed on January 5, 1987. Thus, this footnote is no longer necessary, and deletion of it will not create the possibility of a new or different type of accident.
3. Footnotes (b), (7) and (h) were added to support a one-time hydrogen injection test, which was completed on January 5, 1987. No additional testing is planned; therefore, the footnotes no longer apply and should be deleted. This deletion has no impact on the margin of safety.

Proposed Change Number 10

Delete Footnote ** from Surveillance Requirement 4.1.3.5.b.

Basis

Footnote ** was added to the BSEP-1 Technical Specifications via Amendment 33 on December 23, 1980 to allow a one-time extension in the surveillance interval for Surveillance Requirement 4.1.3.5.b from February 10, 1981 to "before the completion of the Spring 1981 outage." The required surveillance testing was completed during the Spring 1981 outage; therefore, this footnote is no longer necessary.

10CFR50.92 Evaluation

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

1. The proposed change deletes a footnote which no longer applies. The footnote was added to allow a one-time extension in the surveillance interval for Surveillance Requirement 4.1.3.5.b. The extension expired after the Spring 1981 outage and the surveillance was completed during that outage; therefore, the footnote no longer applies. Thus, the proposed change has no impact on the probability or consequences of an accident.
2. The referenced footnote no longer applies to BSEP-1. The surveillance interval extension expired after the Spring 1981 outage. Thus, this footnote is no longer necessary. Therefore, its deletion will not create the possibility of a new or different type of accident.
3. Footnote ** was added to the Technical Specifications to allow a one-time extension of a surveillance interval which expired after the Spring 1981 outage. Therefore, this deletion has no impact on the margin of safety of the plant.

Proposed Change Number 11

Combine Footnote ##, "Includes time delay added by time delay relay (E41-TDR-K33 and E41-TDR-K43)" and Footnote ###, "Includes time delay added by time delay relay (E51-TDR-K32 and E51-TDR-K12)" into Footnote (c), "Includes time delay added by time delay relay."

Basis

The proposed change is being made to support deletion of the instrument tag numbers throughout the Technical Specifications. Deletion of the tag numbers from Footnotes ## and ### makes the footnotes identical and, therefore it is unnecessary to have both. This is being handled as an administrative change since it involves deletion of information not required to be in the Technical Specifications. The Standard Technical Specifications (STS) for General Electric boiling water reactors list only instrument function; they do not provide the specific tag numbers of the instruments associated with each function.

Originally, BSEP included the instrument tag numbers in its Technical Specifications because it was thought the presence of the instrument tag numbers in the Technical Specifications would be beneficial to the plant operators. Since that time, it has taken a great deal of effort by both CP&L and the NRC to keep the instrument numbers updated. As a result, CP&L has determined that it would be more efficient and beneficial to the operators to handle the instrument tag numbers procedurally and remove them from the Technical Specifications. Such a deletion could result in two or more less Technical Specification amendment requests per year, thereby reducing both NRC and CP&L workload without having a negative impact on the safety of the plant.

10CFR50.92 Evaluation

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

1. The proposed change does not involve a change in the design, operation or testing of any plant system. It deletes information not required to be included in the Technical Specifications thereby potentially reducing both NRC and CP&L administrative effort involved in keeping the Technical Specifications updated. The instrument tag numbers will be addressed in plant procedures and updated there as necessary. The requirements and conditions for equipment operability and the surveillance requirements associated with the affected equipment have not been changed. Therefore, this change has no effect on the probability of an accident, nor does it impact the consequences of any accident previously evaluated.

2. The proposed change deletes information not required to be addressed in the Technical Specifications. It does not reflect a change to the design, operation or testing of plant equipment; it only administratively deletes the instrument tag numbers from the Technical Specifications. The instrument tag numbers will be maintained and updated in the plant procedures. Therefore, there are no new or different accident possibilities created.

3. The proposed change has no effect on the design, operation, or testing of any plant system. It only deletes references to instrument tag numbers for the Technical Specifications. The instrument tag numbers are not required to be incorporated in the Technical Specifications, and it takes a great deal of effort for both the NRC and CP&L to keep the information updated. The instrument tag numbers will be handled and updated via plant procedures, thereby potentially eliminating the need for several Technical Specification amendment requests per year. Therefore, since the information will continue to be maintained, only in a different form, there is no impact on the margin of safety of the plant.