



Carolina Power & Light Company
PO Box 10429
Southport NC 28461-0429

John S. Keenan
Vice President
Brunswick Nuclear Plant

December 1, 2000

10 CFR 50.90

SERIAL: BSEP 00-0157

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT TO TECHNICAL SPECIFICATION 5.6.3,
RADIOACTIVE EFFLUENT RELEASE REPORT, AND ONE-TIME EXEMPTION
FROM 10 CFR 50.36a(a)(2)

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light (CP&L) Company is requesting a revision to the Technical Specifications (TSs) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendment revises TS 5.6.3, "Radioactive Effluent Release Report," and its associated note for BSEP, Unit Nos. 1 and 2.

The proposed amendment establishes the submittal date for the Radioactive Effluent Release Report as prior to May 1. This proposed change is consistent with Technical Specification Task Force Traveler No. 152 (TSTF-152), "Revise Reporting Requirements to be Consistent with 10 CFR 20," which was approved by the NRC on March 13, 1997.

With the issuance of the proposed amendment, CP&L also requests a one-time exemption from 10 CFR 50.36a(a)(2) in order to reset the required submittal date for the Radioactive Effluent Release Report for calendar year 2000 to "prior to May 1, 2001." 10 CFR 50.36a(a)(2) states that the interval between submittals of the Radioactive Effluent Release Report must not exceed 12 months. To meet this requirement, the next submittal of the Radioactive Effluent Release Report will be required prior to March 1, 2001. After the one-time exemption, the submittal date will correspond to the proposed change to TS 5.6.3 of "prior to May 1 of each year." The exemption will not affect the information required to be submitted or the time period the report covers, only the date the report is to be submitted.

In accordance with 10 CFR 50.91(b), CP&L is providing Mr. Mel Fry of the State of North Carolina a copy of the proposed license amendment.

In order to allow time for orderly incorporation into copies of the TS, CP&L requests that the proposed license amendment, once approved by the NRC, be issued with an effective date within 60 days from the date of issuance of the amendment. In order to reduce the administrative burden associated with current submittal schedule for the Radioactive Effluent Release Report for calendar year 2000, CP&L requests that the one-time exemption to 10 CFR 50.36a(a)(2), and license amendment be issued by February 15, 2001.

Please refer any questions regarding this submittal to Mr. David C. DiCello,
Manager - Regulatory Affairs, at (910) 457-2235.

Sincerely,



John S. Keenan

PSJ/psj

Enclosures:

1. Basis for Change and Exemption Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Typed Technical Specification Pages – Unit No. 1
6. Typed Technical Specification Pages – Unit No. 2
7. Marked-up Technical Specification Pages – Unit No. 1
8. Marked-up Technical Specification Pages – Unit No. 2

John S. Keenan, 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, and agents of Carolina Power & Light Company.

Barbara V. Carpenter
Notary (Seal)



My commission expires:

My Commission Expires 2/16/2003

cc (with enclosures):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Mr. Luis A. Reyes, Regional Administrator
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303-8931

U. S. Nuclear Regulatory Commission
ATTN: Mr. Theodore A. Easlick, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission
ATTN: Mr. Donnie J. Ashley (Mail Stop OWFN 8G9)
11555 Rockville Pike
Rockville, MD 20852-2738

Ms. Jo A. Sanford
Chair - North Carolina Utilities Commission
P.O. Box 29510
Raleigh, NC 27626-0510

Mr. Mel Fry
Director - Division of Radiation Protection
North Carolina Department of Environment and Natural Resources
3825 Barrett Drive
Raleigh, NC 27609-7221

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT TO
TECHNICAL SPECIFICATION 5.6.3, "RADIOACTIVE EFFLUENT RELEASE REPORT"
AND
ONE-TIME EXEMPTION FROM 10 CFR 50.36a(a)(2)

BASIS FOR CHANGE AND EXEMPTION REQUESTS

TS Amendment Request

Background

Currently, Technical Specification (TS) 5.6.3 requires the Radioactive Effluent Release Report to be submitted in accordance with 10 CFR 50.36a which states "the time between submission of the reports must be no longer than 12 months." As a result, the Brunswick Steam Electric Plant (BSEP) Radioactive Effluent Release Report must be submitted prior to March 1. This presents an undue administrative burden on BSEP relative to the compressed schedule following close of the reporting period for data collection and report preparation. Carolina Power & Light (CP&L) Company requests the submittal date for BSEP, Unit Nos. 1 and 2, be revised to "prior to May 1," consistent with Technical Specification Task Force Traveler 152 (TSTF-152) which has been generically approved by the NRC.

Current Requirement

Technical Specification (TS) 5.6.3 states:

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the

Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

Proposed Change

Revise Technical Specification 5.6.3 as follows:

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal **shall** combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering operation of the unit **during the previous year** shall be submitted **prior to May 1 of each year** in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

[Emphasis added to revised language]

Basis For Proposed Change

The current TS 5.6.3 for BSEP, Unit Nos. 1 and 2, requires the Radioactive Effluent Release Report to be submitted in accordance with 10 CFR 50.36a. For BSEP, the submittal date is currently prior to March 1 in order to meet the submission interval contained in 10 CFR 50.36a of "not longer than 12 months since submission of the last report." CP&L requests to revise the submission date for the report to "prior to May 1" and administratively change the verb "should" to "shall" in the associated note which are consistent with TSTF-152, approved by the NRC on March 13, 1997.

The proposed change only alters the submission date for the Radioactive Effluent Release Report to a date that has been previously approved on a generic basis by the NRC. The proposed change is administrative in nature. It does not change the information to be submitted in the report and will not change the physical plant or affect plant operation.

The proposed change is requested to alleviate undue administrative and schedule burden associated with data collection and report preparation.

The proposed change to TS 5.6.3 is consistent with TSTF-152, which the NRC approved on a generic basis on March 13, 1997. TSTF-152 permits licensees to submit the Radioactive Effluent Release Report, covering the operation of the facility during the previous calendar year, prior to May 1 of each year.

Exemption Request

With the issuance of the proposed amendment, CP&L also requests a one-time exemption from 10 CFR 50.36a(a)(2) in order to reset the required submittal date for the Radioactive Effluent Release Report for calendar year 2000 to "prior to May 1, 2001." The exemption is necessary to allow CP&L to submit the BSEP calendar year 2000 report 14 months following the calendar year 1999 report. Approval of the requested TS 5.6.3 amendment would result in exceeding the Radioactive Effluent Release Report 12-month submittal interval requirement of 10 CFR 50.36a(a)(2) in the year 2001. The exemption will not affect the information required to be submitted for the time period the report covers, only the date the report is to be submitted.

The special circumstances required by 10 CFR 50.12(a)(2)(ii) are present since the current submittal date presents an undue administrative burden on CP&L. This burden consists of the time required for receipt of multi-discipline input to the report, analysis of composite samples by an offsite laboratory, and processing of meteorological data prior to preparation of this lengthy report. These activities consume nearly the entire time available for report preparation. The application of the submittal time requirement of 10 CFR 50.36a(a)(2) for the Radioactive Effluent Release Report is not required to achieve the underlying purpose of the rule. After the one-time exemption, the submittal date will comply with 10 CFR 50.36a(a)(2) and to the proposed change to TS 5.6.3 of "prior to May 1 of each year."

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT TO
TECHNICAL SPECIFICATION 5.6.3, "RADIOACTIVE EFFLUENT RELEASE REPORT"
AND
ONE-TIME EXEMPTION FROM 10 CFR 50.36a(a)(2)

10 CFR 50.92 EVALUATION

Carolina Power & Light Company has concluded that the proposed change to the Brunswick Steam Electric Plant, Unit Nos. 1 and 2, Technical Specification (TS) 5.6.3 which would revise the submittal date for the Radioactive Effluent Release Report does not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

1. The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is administrative in nature. The date of submittal of the Radioactive Effluent Release Report is not an initiator of any analyzed event. Similarly, the date of submission does not affect the consequences of any accident previously evaluated. The proposed change will not physically alter the plant, and it will not affect plant operation. The proposed change to the submission date of the Radioactive Effluent Release Report will continue to meet the reporting requirement of 10 CFR 50.36a(a)(2) and further clarifies when the report is to be submitted. As such, the proposed change does not involve an increase in the probability or consequence of any accident previously evaluated.

2. The proposed license amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS change is administrative in nature. It would revise the date by which the Radioactive Effluent Release Report is required to be submitted to the NRC. Revision of the submittal date for the report will not affect any accident initiator or cause any new accident precursors to be created. The proposed change will not affect the types or amounts of radioactive effluents released or cumulative occupational radiological exposures.

3. The proposed license amendment does not involve a significant reduction in a margin of safety.

The proposed change to the submittal requirement for the Radioactive Effluent Release Report is only an administrative change and will have no affect on any margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
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LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT TO
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AND
ONE-TIME EXEMPTION FROM 10 CFR 50.36a(a)(2)

ENVIRONMENTAL CONSIDERATIONS

Carolina Power & Light (CP&L) Company has concluded that the proposed change to the Brunswick Steam Electric Plant, Unit Nos. 1 and 2, Technical Specification 5.6.3, which would revise the submittal date for the Radioactive Effluent Release Report, is eligible for categorical exclusion from performing an environmental assessment. In support of this determination, an evaluation of each of the three (3) criteria set forth in 10 CFR 51.22(c)(9) is provided below.

1. The proposed license amendment does not involve a significant hazards consideration, as presented in Enclosure 2.
2. The proposed change is administrative only and will not result in any change in the types or any increase in the amounts of effluents that may be released offsite. The proposed license amendment does not introduce new equipment nor require existing equipment or systems to perform a different type of function than they are presently designed to perform. Therefore, CP&L has concluded that there will not be any increase in the types or amounts of any effluent that may be released offsite and, as such, the change does not involve irreversible environmental consequences beyond those already associated with normal operation. Only the report submission date will be changed. The information contained in the report will be unaffected for the period covered by the report.
3. The proposed license amendment would only change an administrative reporting requirement. The proposed change will have no affect on any individual or cumulative occupational exposure. Only the report submittal date will be changed. The information contained in the report will be unaffected for the period covered by the report.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
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LICENSE NOS. DPR-71 AND DPR-62
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AND
ONE-TIME EXEMPTION FROM 10 CFR 50.36a(a)(2)

PAGE CHANGE INSTRUCTIONS

<u>UNIT 1</u>	
Remove	Insert
5.0-18	5.0-18

<u>UNIT 2</u>	
Remove	Insert
5.0-18	5.0-18

ENCLOSURE 5

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
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AND
ONE-TIME EXEMPTION FROM 10 CFR 50.36a(a)(2)

TYPED TECHNICAL SPECIFICATION PAGES – UNIT NO. 1

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

-----NOTE-----
A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

(continued)

ENCLOSURE 6

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT TO
TECHNICAL SPECIFICATION 5.6.3, "RADIOACTIVE EFFLUENT RELEASE REPORT"
AND
ONE-TIME EXEMPTION FROM 10 CFR 50.36a(a)(2)

TYPED TECHNICAL SPECIFICATION PAGES – UNIT NO. 2

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

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A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

(continued)

ENCLOSURE 7

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT TO
TECHNICAL SPECIFICATION 5.6.3, "RADIOACTIVE EFFLUENT RELEASE REPORT"
AND
ONE-TIME EXEMPTION FROM 10 CFR 50.36a(a)(2)

MARKED-UP TECHNICAL SPECIFICATION PAGES – UNIT NO. 1

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

-----NOTE-----
A single submittal may be made for a multiple unit station. The submittal ~~should~~ combine sections common to all units at the station. *shall*

*during the
previous year*

*prior to
May 1 of
each year*

The Radioactive Effluent Release Report covering the operation of the unit ~~shall~~ be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

(continued)

ENCLOSURE 8

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT TO
TECHNICAL SPECIFICATION 5.6.3, "RADIOACTIVE EFFLUENT RELEASE REPORT"
AND
ONE-TIME EXEMPTION FROM 10 CFR 50.36a(a)(2)

MARKED-UP TECHNICAL SPECIFICATION PAGES – UNIT NO. 2

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

-----NOTE-----
A single submittal may be made for a multiple unit station. The submittal ~~should~~ combine sections common to all units at the station. *shall*

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The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

(continued)