

JAN 6 1976

Docket No. 50-324

Carolina Power & Light Company
ATTN: Mr. J. A. Jones
Executive Vice President
336 Fayetteville Street
Raleigh, North Carolina 27602

Gentlemen:

The Commission has issued the enclosed Amendment No. 9 to Facility Operating License No. DPR-62 for the Brunswick Steam Electric Plant, Unit 2. This amendment includes Change No. 8 to the Technical Specifications and is in response to your request dated October 14, 1975.

This amendment revises the provisions in the Technical Specifications relating to the off-site review and audit function.

Copies of the related Safety Evaluation and the Federal Register Notice are also enclosed.

Sincerely,

Original signed by:
Robert A. Purple

Robert A. Purple, Chief
Operating Reactors Branch #1
Division of Reactor Licensing

Enclosures:

1. Amendment No. 9
2. Safety Evaluation
3. Federal Register Notice

cc w/enclosures:
See next page

OFFICE ▶	RL:ORB#1	RL:ORB#1	OELD	RL:ORB#1		
SURNAME ▶	Trammell:fb	RHVolmer	R Mitchell	RAPurple		
DATE ▶	12/12/75	12/12/75	12/24/75	12/6/76		

JAN 6 1976

cc w/enclosures:

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Mr. W. A. Kopp, Jr.
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1421 Peachtree Street, NE.
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-324

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. **9**
License No. DPR-62

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power & Light Company (the licensee) dated October 14, 1975, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations; and
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.
2. Accordingly, the license is amended by a change to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility License No. DPR-62 is hereby amended to read as follows:



"2.C.(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications, as revised by issued changes thereto through Change No. 8."

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:

Robert A. Purple

Robert A. Purple, Chief
Operating Reactors Branch #1
Division of Reactor Licensing

Attachment:
Change No. 8 to the
Technical Specifications

Date of Issuance: JAN 6 1976

OFFICE ►						
SURNAME ►						
DATE ►						

ATTACHMENT TO LICENSE AMENDMENT NO. 9
CHANGE NO. 8 TO THE TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSE NO. DPR-62
DOCKET NO. 50-324

Revise Appendix A as follows:

Remove the following pages and replace with identically numbered revised pages:

iii/iv

vii/viii

6.5-3/6.5-4

6.5-5/6.5-6

6.5-7/6.5-8

6.6-1

6.7-1

Fig. 6.5-1/Fig. 6.5-2

Fig. 6.2-1/Fig. 6.2-2

Remove Fig. 6.1-1.

Revise Appendix B as follows:

Remove Fig. 5.1-1 and replace with identically numbered revised figure.

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recommendations to prevent recurrence to the Manager of Nuclear Generation and to the Manager - Corporate Nuclear Safety.

- f) Review of facility operations to detect potential safety hazards.
- g) Performance of special reviews and investigations and reports thereon as requested by the Manager - Corporate Nuclear Safety.
- h) Review of the Plant Security Plan and implementing procedures.
- i) Review of the Emergency Plan and implementing procedures.
- j) Review of all events requiring 24-hour reports to the NRC by regulations or Technical Specifications.

6.5.1.8 Authority

- a) The Plant Nuclear Safety Committee shall be advisory.
- b) The Plant Nuclear Safety Committee shall recommend to the Plant Manager approval or disapproval of proposals under 6.5.1.7 a) through d) above.

In the event of disagreement between the recommendations of the Plant Nuclear Safety Committee and the actions contemplated by the Plant Manager, the course determined by the Plant Manager to be more conservative will be followed with immediate notification to the Manager of Nuclear Generation and to the Manager - Corporate Nuclear Safety.

- c) The Plant Nuclear Safety Committee shall make determinations as to whether or not proposals considered by the Committee involve unreviewed safety questions. This determination shall be subject to review by the Manager - Corporate Nuclear Safety as specified under 6.5.2.4.a.

6.5.1.9 Records

Minutes shall be kept at the plant of all meetings of the Plant Nuclear Safety Committee and copies shall be sent to the Manager of Nuclear Generation and to the Manager - Corporate Nuclear Safety.

6.5.1.10 Procedures

Written administrative procedures for committee operation shall be prepared and maintained.

6.5.2 Independent Off-Site Safety Review Program

Activities occurring during plant operations shall be independently reviewed as specified in succeeding paragraphs.

6.5.2.1 Purpose

The purpose of the independent off-site safety review program is to review significant plant changes, tests, and procedures; verify that reportable occurrences are promptly investigated and corrected in a manner which reduces the probability of recurrence of such events; and detect trends which may not be apparent to a day-to-day observer.

6.5.2.2 Responsibility

The Manager - Corporate Nuclear Safety under the Department Manager - Special Services Department is charged with the overall responsibility for administering the independent off-site nuclear safety review program as follows:

- a. Approves selection of the person or persons to conduct off-site safety reviews.
- b. Has access to the plant operating records and operating personnel in performing the independent reviews.
- c. Prepares and retains written records of reviews.
- d. Assures independent safety review is conducted on all items required by Section 6.5.2.4.
- e. Distributes reports and other records to appropriate managers.

6.5.2.3 Personnel

- a. Personnel assigned responsibility for independent reviews shall be specified in technical disciplines, and shall collectively have the experience and competence required to review problems in the following areas:
 1. Nuclear power plant operations
 2. Nuclear engineering
 3. Chemistry and radiochemistry
 4. Metallurgy
 5. Instrumentation and control
 6. Radiological safety

7. Mechanical and electrical engineering
 8. Administrative controls
 9. Seismic and environmental
 10. Quality assurance practices
- b. The following minimum experience requirements shall be established for those persons involved in the independent off-site safety review program:
1. Manager - Bachelor of Science in engineering or related field and ten (10) years related experience including five (5) years involvement with operation and/or design of nuclear power plants.
 2. Reviewers - Bachelor of Science in engineering or related field and five (5) years related experience including three (3) years involvement with operation and/or design of nuclear power plants.
- c. An individual may possess competence in more than one specialty area. If sufficient expertise is not available with the Corporate Nuclear Safety Section, competent individuals from other CP&L organizations or outside consultants shall be utilized in performing independent off-site reviews and investigations.
- d. At least three persons, qualified as discussed in Specification 6.5.2.3.b.2, will review each item submitted under the requirements of 6.5.2.4.
- e. Independent safety reviews shall be performed by personnel not directly involved with the activity or responsible for the activity.

6.5.2.4 Subjects Requiring Independent Review

The following subjects shall be reviewed by the Corporate Nuclear Safety Section:

- a. Written safety evaluations of changes in the facility as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report and tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests, or experiments did not involve a change in the technical specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2).
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the

technical specifications or an unreviewed safety question pursuant to 10 CFR 50.59(c). Matters of this kind shall be referred to the Corporate Nuclear Safety Section by the Plant Nuclear Safety Committee following its review, or by other functional organizational units within Carolina Power & Light Company (CP&L) prior to implementation.

- c. Changes in the technical specifications or license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change.
- d. Violations, deviations and reportable events, which require reporting to the NRC within 24 hours, and as defined in the plant technical specifications such as:
 - (1) Violations of applicable codes, regulations, orders, technical specifications, license requirements or internal procedures or instructions having safety significance; and
 - (2) Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components.

Review of events covered under this paragraph shall include the results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- e. Any other matter involving safe operation of the nuclear power plant which the Manager - Corporate Nuclear Safety Section deems appropriate for consideration, or which is referred to the Manager - Corporate Nuclear Safety Section by the onsite operating organization or by other functional organizational units within Carolina Power & Light Company.

6.5.2.5 Follow-Up Action

Results of Corporate Nuclear Safety (CNS) Section reviews, including recommendations and concerns will be documented.

- a. Copies of the documented review will be retained in the Corporate Nuclear Safety Section files.
- b. Recommendations and concerns will be submitted to the Manager - Nuclear Generation within 14 days of determination.
- c. A summation of Corporate Nuclear Safety Section recommendations and concerns will be submitted to the Company President; Group Executive -

Engineering, Construction & Operation Group; Department Head - Bulk Power Supply; Department Head - Special Services; Plant Manager and others, as appropriate on at least a bi-monthly frequency.

- 6.5.2.6 The Corporate Nuclear Safety Section review program shall be conducted in accordance with written, approved procedures.

6.5.3 Independent Off-Site Quality Assurance Audit Program

6.5.3.1 Purpose

Audits of activities shall be performed under the cognizance of the Corporate Quality Assurance Audit (CQAA) Section. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per six months.
- d. The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.
- e. The Emergency Plan and implementing procedures at least once per two years.
- f. The Security Plan and implementing procedures at least once per two years.
- g. Any other area of facility operation considered appropriate by the Corporate Quality Assurance Audit Section or the Vice President - Bulk Power Supply Department.

6.5.3.2 Responsibility

The Manager - Corporate Quality Assurance Audit is charged with the overall responsibility for the corporate quality assurance audit program as follows:

- a. Selects auditors and
- b. Has access to records and personnel necessary in performing the audits.

6.5.3.3 Personnel

- a. Audit personnel will be independent of the area audited. Selection for auditing assignments is based on experience or training which establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting auditing personnel, consideration will be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.
- b. Qualified outside consultants or other individuals independent from those personnel directly involved in plant operation, but within the EC&O Group will be used to augment the audit teams when necessary.

6.5.3.4 Reports

Results of audit are approved by the Manager - Corporate Quality Assurance Audit and transmitted directly to the Company President and the Group Executive - Engineering, Construction & Operation Group, as well as, to the Department Head - Bulk Power Supply, Department Head - Special Services, and others, as appropriate within 30 days after the completion of the audit.

- 6.5.3.5 The corporate quality assurance audit program shall be conducted in accordance with written, approved procedures.

6.6 Reportable Occurrence Action

The following actions shall be taken in the event of a reportable occurrence:

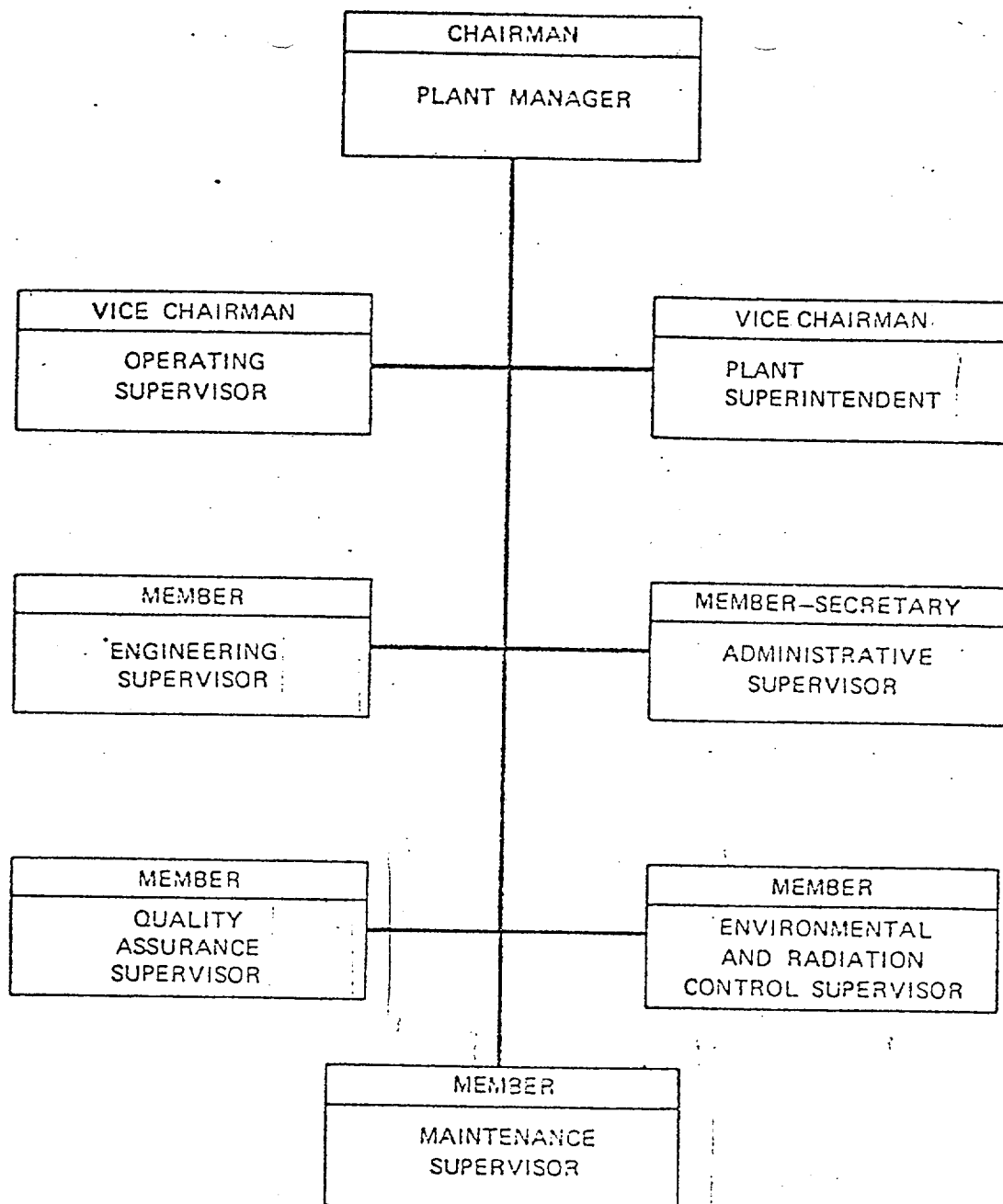
- a. The NRC shall be notified and/or a report submitted by the Plant Manager pursuant to the requirements of Specification 6.11.
- b. Each reportable occurrence report shall be submitted to the Manager - Nuclear Generation and the Manager - Corporate Nuclear Safety.

6.7

Safety Limit Violation

If a safety limit is exceeded, the affected reactor shall be shut down and reactor operation shall only be resumed in accordance with the authorization within 10CFR50.36(c)(1)(i). An immediate report shall be made to the Manager - Nuclear Generation, to the Manager - Corporate Nuclear Safety, and to the Office of Inspection and Enforcement, NRC.

A complete analysis of the circumstances leading up to and resulting from the situation together with recommendations to prevent a recurrence shall be prepared by the Plant Nuclear Safety Committee. This report shall be submitted to the Manager - Nuclear Generation and the Manager - Corporate Nuclear Safety for independent review. Appropriate analyses or reports shall be submitted to the NRC by the Bulk Power Supply Department within 14 days of the violation.



NOTES:

- (1) ANY THREE MEMBERS OR DESIGNATED ALTERNATES PLUS CHAIRMAN OR VICE CHAIRMAN CONSTITUTES A QUORUM.
- (2) MEETINGS HELD AT LEAST ONCE A MONTH

November 1975

CAROLINA POWER & LIGHT COMPANY
BRUNSWICK STEAM ELECTRIC PLANT
UNITS 1 & 2
Final Safety Analysis Report

ORGANIZATION OF PLANT
NUCLEAR SAFETY COMMITTEE

FIG. NO.

6.5-1

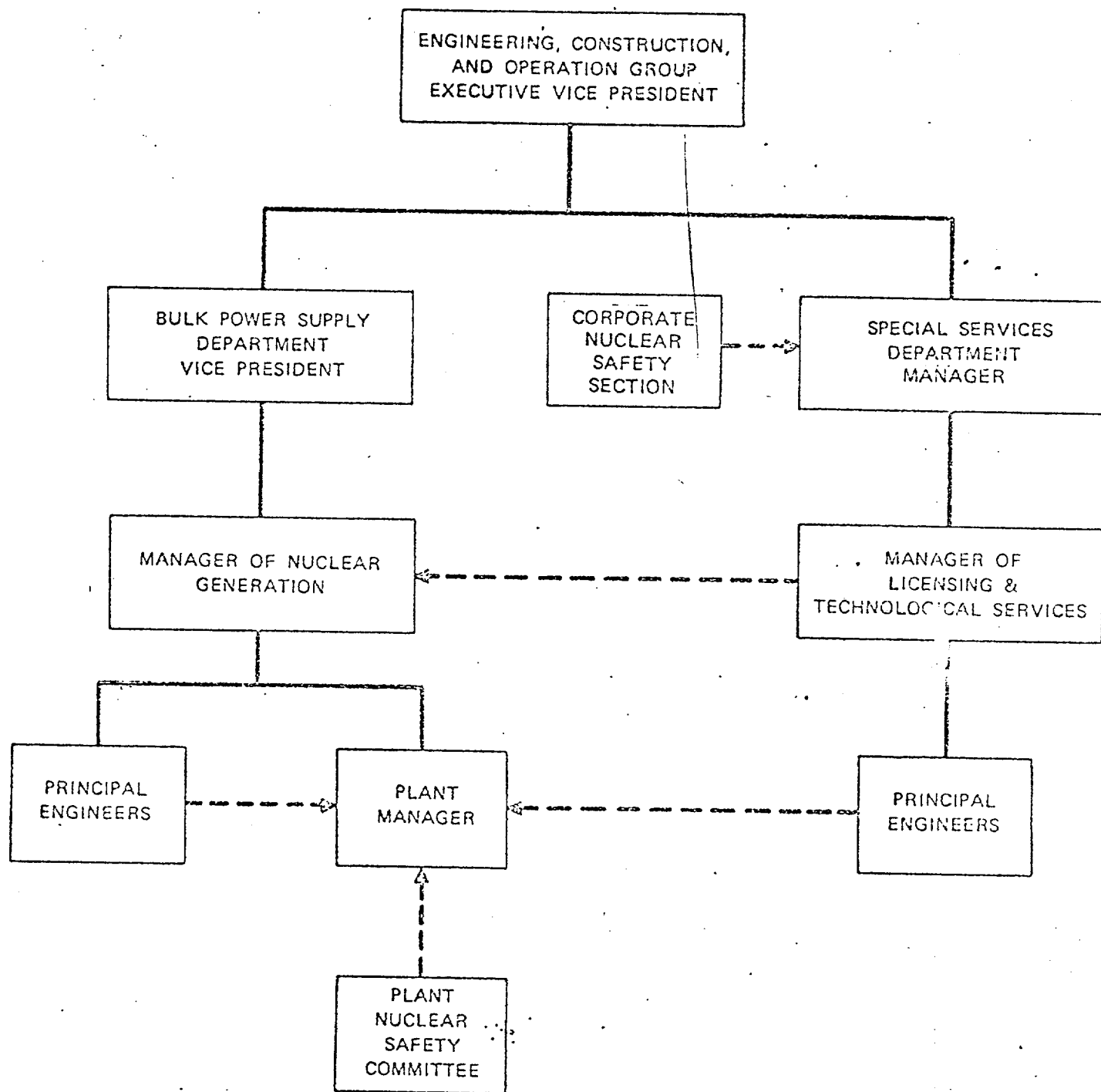
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JAN 6 1976

CAROLINA POWER & LIGHT COMPANY
BRUNSWICK STEAM ELECTRIC PLANT
UNITS 1 & 2
Final Safety Analysis Report

FIG. NO.

6.5-2



JAN 6 1976

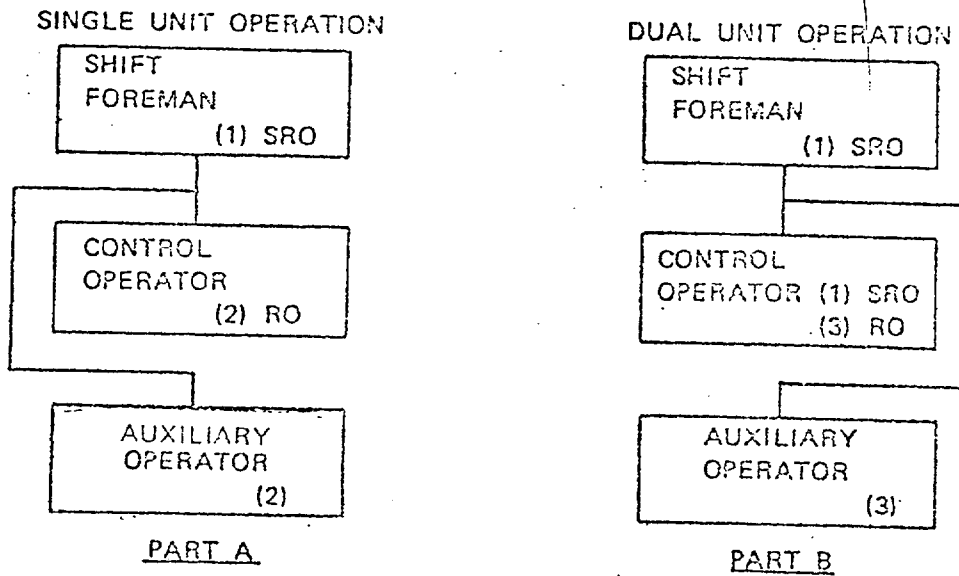
CAROLINA POWER & LIGHT COMPANY
BRUNSWICK STEAM ELECTRIC PLANT
UNITS 1 & 2
Final Safety Analysis Report

MANAGEMENT ORGANIZATION CHART

FIG. NO.

6.2-1

SHIFT COMPLEMENT:



SRO - SENIOR REACTOR OPERATOR LICENSE

RO - REACTOR OPERATOR LICENSE

() - NUMBERS OF PERSONNEL INDICATED IN PARENTHESES

AN SRO MUST BE ON SITE AT ALL TIMES WHEN EITHER UNIT HAS FUEL IN THE REACTOR AND EITHER OR BOTH UNITS ARE SHUTDOWN.

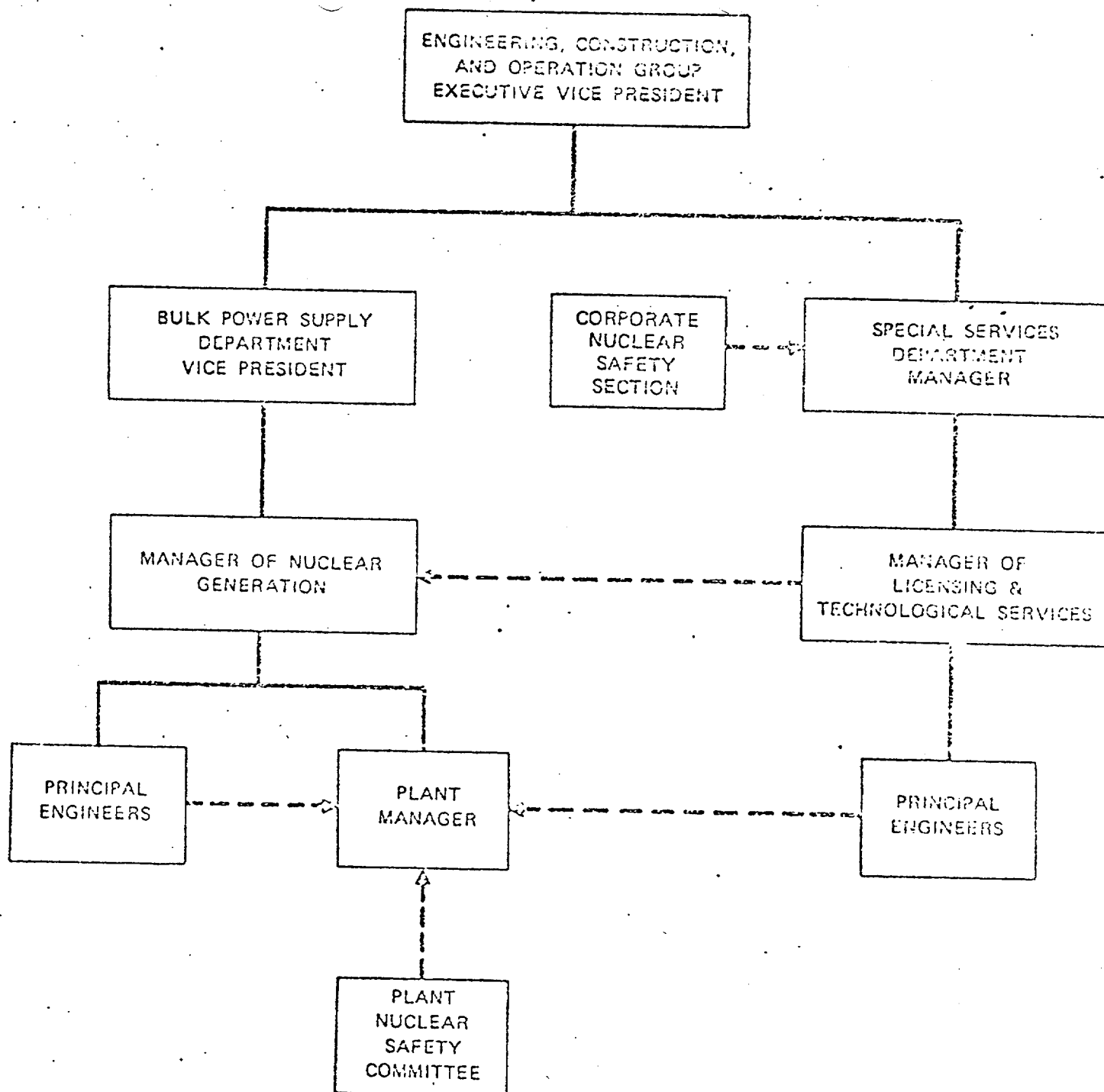
AMENDMENT 26
SEPTEMBER 1974

CAROLINA POWER & LIGHT COMPANY
BRUNSWICK STEAM ELECTRIC PLANT
UNITS 1 & 2
Final Safety Analysis Report

SHIFT OPERATING CREWS

FIG. NO.

6.2-2



JAN 6 1976

CAROLINA POWER & LIGHT COMPANY BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 & 2 Final Safety Analysis Report	
MANAGEMENT ORGANIZATION CHART	
FIG. NO.	5.1-1

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 9 TO FACILITY LICENSE NO. DPR-62

CHANGE NO. 8 TO TECHNICAL SPECIFICATIONS

CAROLINA POWER & LIGHT COMPANY

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-324

Introduction

By letter dated October 14, 1975, Carolina Power & Light Company (the licensee) proposed changes to the Technical Specifications appended to Facility Operating License No. DPR-62 for the Brunswick Steam Electric Plant, Unit No. 2. The proposed changes involved changes to the administrative controls and changes to the reporting requirements. Amendment No. 7 (Change No. 6 to the Technical Specifications), issued November 11, 1975, addressed all of the requested changes except for the licensee's request for a restructured off-site review and audit organization. As noted in our Safety Evaluation associated with Amendment No. 7, our review of this aspect of the licensee's request had not been completed. This review has now been completed, and therefore this Safety Evaluation presents our assessment of the licensee's proposal to modify the off-site review and audit organization.

Discussion

At the present time, the independent off-site review and audit function is conducted by the Company Nuclear Safety Committee, consisting of at least eight personnel within the CP&L organization and at least one non-company technical consultant. The committee meets at least once per calendar quarter during the initial year of plant operation and twice per year thereafter. The committee meets to review and conduct audits of the nuclear safety aspects of plant operation to verify that operation of the plant is performed in a safe manner and is consistent with company policy and rules, approved operating procedures, and license provisions; to review important proposed plant changes, tests, and procedures; to verify that unusual events are promptly investigated and corrected in a manner that reduces the probability of recurrence of such events; and to detect trends that may not be apparent to a day-to-day observer.

Instead of this committee system for review and audit, the licensee proposes to establish a full-time off-site review group, designated the Corporate Nuclear Safety Section, and headed by the Manager - Corporate Nuclear Safety. The audit function would be performed by a separate independent group, designated the Corporate Quality Assurance Audit Section, headed by the Manager - Corporate Quality Assurance Audit.

Evaluation

Provisions for independent (off-site) review and audit of facility operations should be in accord with Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," which endorses proposed standard ANS 3.2, which was subsequently issued as ANSI N18.7-1972.

This standard recognizes that the means for review and audit may take different forms, and does not specify an organizational structure for meeting the review and audit functions, but in lieu thereof delineates the essential elements of a satisfactory comprehensive review and audit program.

During our review of the proposed change, we found that certain modifications to the proposal were necessary to have conformance to the desired regulatory position. These included adding minimum qualifications for both the Manager - Corporate Nuclear Safety (CNS) and members of the Corporate Nuclear Safety Section and requiring that each item submitted for review by the CNS Section be reviewed by at least three persons.

The Manager - CNS will be required to have a Bachelor of Science in engineering or a related field and ten years of related experience, including five years involvement with operation and/or design of nuclear power plants. Members of the CNS Section will have a Bachelor of Science in engineering or a related field and five years of related experience, including three years involvement with operation and/or design of nuclear power plants. The requirement that at least three persons review material submitted to the CNS Section will retain the multi-discipline review concept previously embodied in the committee review scheme.

Other changes to the licensee's proposal included adding the requirement that recommendations of the CNS Section be forwarded to higher management levels within 14 days after the conclusion of a review, and updating the listing of the items that are to be reviewed and audited. These changes were discussed with members of the CP&L staff and are acceptable to them.

We find that the revised organizational structure for independent (off-site) review and audit is consistent with the requirements for such activities as stated in ANSI N18.7-1972, contains the essential elements of a comprehensive review and audit program, and is acceptable.

Conclusion

We have concluded, based on the considerations discussed above, that:
(1) because the change does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the changes does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: JAN 6 1976

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-324

CAROLINA POWER & LIGHT COMPANY

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY
OPERATING LICENSE

Notice is hereby given that the U.S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 9 to Facility Operating License No. DPR-62 issued to Carolina Power & Light Company for operation of the Brunswick Steam Electric Plant, Unit 2, located in Brunswick County, North Carolina. The amendment is effective as of its date of issuance.

This amendment revises the provisions in the Technical Specifications relating to the off-site review and audit function.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment is not required since the amendment does not involve a significant hazards consideration .

For further details with respect to this action, see (1) the application for amendment dated October 14, 1975, (2) Amendment No. 9 to License No. DPR-62 with Change No. 8 and (3) the Commission's related Safety Evaluation.

All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, NW., Washington, D.C. and at the Southport-Brunswick County Library, 109 W. Moore Street, Southport, North Carolina 28461.

A copy of items (2) and (3) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Reactor Licensing.

Dated at Bethesda, Maryland, this JAN 6 1976

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:
Robert A. Purple

Robert A. Purple, Chief
Operating Reactors Branch #1
Division of Reactor Licensing

OFFICE ▶	RL:ORB#1	TR:OAB	OELD	RL:ORB#1		
SURNAME ▶	Trammell	Volmer	Mitchell	RAPurple		
DATE ▶	12/15/75	12/15/75	12/15/75	12/6/76		