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

DO NOT REMOVE

February 3, 1982

Posted Am-67 to DPR-62

Docket Nos. 50-325 (50-324)

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

Dear Mr. Jones:

The Commission has issued the enclosed Amendment Nos. 44 and 67 to Facility Operating Licenses Nos. DPR-71 and DPR-62 for the Brunswick Steam Electric Plant, Units 1 and 2. The amendments consist of changes to the Technical Specifications in response to your submittal of January 8, 1982.

These amendments change the Technical Specifications to permit Mr. R. C. Knobel to fill the position of Manager-Operations without a Senior Reactor Operator (SRO) license until such time as he completes the formal SRO examination requirements as scheduled by our Operator Licensing Branch.

Copies of the Safety Evaluation and a related Notice of Issuance are also enclosed.

Sincerely,

Domenic B. Vassallo, Chief Operating Reactors Branch #2 Division of Licensing

Enclosures:

1. Amendment No. 44 to DPR-71

2. Amendment No. 67 to DPR-62

3. Safety Evaluation

4. Notice

cc: w/enclosures - See next page

Mr. J. A. Jones Carolina Power & Light Company

cc:

Richard E. Jones, Esquire Carolina Power & Light Company 336 Fayetteville Street Raleigh, North Carolina 27602

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Mr. Charles R. Dietz Plant Manager P. O. Box 458 Southport, North Carolina 28461

Mr. Franky Thomas, Chairman Board of Commissioners P. O. Box 249 Bolivia, North Carolina 28422

Mrs. Chrys Baggett
State Clearinghouse
Budget & Management
116 West Jones Street
Raleigh, North Carolina 27603

Southport - Brunswick County Library 109 W. Moore Street Southport, North Carolina 28461

U. S. Environmental Protection Agency Region IV Office Regional Radiation Representative 345 Courtland Street, N. W. Atlanta, Georgia 30308

Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 1057
Southport, North Carolina 28461

James P. O'Reilly Regional Administrator, Region II U.S. Nuclear Regulatory Commission 101 Harietta Street, Suite 3100 Atlanta, Georgia 30303



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

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-325

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 44 License No. DPR-71

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power & Light Company dated January 8, 1982 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;
 - 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; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-71 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 44, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

Domenic B. Vassallo, Chief Operating Reactors Branch #2 Division of Licensing

Attachment: Changes to the Technical Specifications

Date of Issuance: February 3, 1982

ATTACHMENT TO LICENSE AMENDMENT NO. 44 FACILITY OPERATING LICENSE NO. DPR-71 DOCKET NO. 50-325

Remove the following page and replace with the identically numbered page.

6.3 FACILITY STAFF QUALIFICATIONS

.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions, except for (1) the (Radiation Protection Manager) who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Plant Fire Chief and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975.

6.5 REVIEW AND AUDIT

6.5.1 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)

FUNCTION

6.5.1.1 The PNSC shall function to advise the General Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PNSC shall be composed of the:

Chairman:

Vice Chairman:

Plant General Manager

Administrative Supervisor -Maintenance Supervisor (I&C)

Operations Manager, Maintenance Manager,

Technical - Administrative Manager, or

Director - Nuclear Safety and OA

Secretary:

Member:

Member:

Member:

Maintenance Supervisor (Mechanical) Member:

Engineering Supervisor

Environmental and Radiation Control Supervisor

Member:

Member: Member: Quality Assurance Supervisor Shift Operating Supervisors

Training Supervisor

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PNSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PNSC activities at any one time.

*Mr. R. C. Knobel is allowed to fill the position, Manager-Operations, without an SRO License until he completes the formal SRO examination requirements as scheduled by the NRC.



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

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-324

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 67 License No. DPR-62

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power & Light Company dated January 8, 1982 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;
 - 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; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-62 is hereby amended to read as follows:

(2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 67, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

Domenic B. Vassallo, Chief Operating Reactors Branch #2 Division of Licensing

Attachment: Changes to the Technical Specifications

Date of Issuance: February 3, 1982

ATTACHMENT TO LICENSE AMENDMENT NO. 67 FACILITY OPERATING LICENSE NO. DPR-62 DOCKET NO. 50-324

Remove the following page and replace with the identically numbered page.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971* for comparable positions, except for (1) the (Radiation Protection Manager) who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

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- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Plant Fire Chief and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975.

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6.5.1.2 The PNSC shall be composed of the:

Chairman:

Vice Chairman:

Plant General Manager

Operations Manager, Maintenance Manager,

Technical - Administrative Manager, or

Director - Nuclear Safety and 'QA

Secretary:

Member:

Member:

Member:

Member:

Member:

Member: Member:

Administrative Supervisor

Maintenance Supervisor (I&C)

Maintenance Supervisor (Mechanical)

Engineering Supervisor

Environmental and Radiation Control

Supervisor

Ouality Assurance Supervisor

Shift Operating Supervisors

Training Supervisor

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PNSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PNSC activities at any one time.

^{*}Mr. R. C. Knobel is allowed to fill the position, Manager-Operations, without an SRO License until he completes the formal SRO examination requirements as scheduled by the NRC.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING AMENDMENT NO. 44 TO FACILITY OPERATING LICENSE NO. DPR-71 AND AMENDMENT NO. 67 TO FACILITY OPERATING LICENSE NO. DPR-62 CAROLINA POWER AND LIGHT COMPANY BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 DOCKET NOS. 50-325 AND 50-324

Author: L. P. Crocker

SAFETY EVALUATION

By letter dated January 8, 1982, Carolina Power & Light Company (CP&L), the licensee, requested revisions to the Technical Specifications for its Brunswick Steam Electric Plant, Units 1 and 2. The requested revisions involve the appointment of Mr. Ronald C. Knobel to fill the position of Manager-Operations at the Brunswick Plant during an interim period in advance of his completion of the NRC examination process for a Senior Reactor Operator (SRO) license on the Brunswick nuclear units.

The circumstances surrounding this request, as stated in the CP&L letter, are that Mr. Knobel has been in training to take an SRO license examination on the Brunswick nuclear units. By letter dated October 13, 1981, the licensee requested that the examination for Mr. Knobel be scheduled during January 1982. However, the licensee has been advised that the NRC Operator Licensing Branch cannot schedule the requested examination before May 1982. The licensee asserts that appointment of Mr. Knobel as Manager-Operations will enhance the safe operation of the Brunswick facility because it would (1) provide coverage of the Manager-Operations position by a highly qualified individual and (2) would allow Mr. William Tucker, the Manager-Technical Support, to return to full time duties as Manager-Technical Support.

Mr. Tucker has been filling the duties of Manager-Operations.

The licensee in effect, requests a waiver of the technical specification requirement that Mr. Knobel possess an SRO license for the Brunswick units before assuming duties as Manager-Operations.

The NRC requirement that a plant manager of operations have a valid SRO license on the unit he supervises comes from paragraphs 3.2.1 and 4.2.2 of

ANSI Standard N18.1-1971, as endorsed by Revision 1 to Regulatory Guide

1.8. The ANSI Standard has recently been superseded by ANS 3.1-1981, which
will soon be endorsed by Revision 2 to Regulatory Guide 1.8. Guidance
pertaining to the requirement that a Senior Operator license be held
by the plant operations manager is the same in these documents.

Based upon the definitions and descriptions of paragraph 3.2.1 of the ANSI Standard and the qualifications and training requirements set forth in paragraph 4.2.2 of the ANSI Standard, both endorsed by Regulatory Guide 1.8, the NRC requires that plant operations managers hold valid SRO licenses on the units they supervise.

In the case of this request by the licensee, there are several factors which warrant consideration:

1. Except for the lack of the SRO license on the Brunswick units,
Mr. Knobel is exceptionally well qualified. For example, where
the ANSI Standard calls for a bachelor's degree in engineering or
science, Mr. Knobel holds both a BS and MS degree in mechanical
engineering and, in addition, is a registered professional engineer;
while the Standard specifies a minimum of four years experience,
three of which are nuclear experience, Mr. Knobel has 21 years of
nuclear experience, much of it related to operation of boiling
water reactors (BWRs) such as the Brunswick units; while the
Standard specifies a minimum of two months experience with plant
operation above 20% power, participation in a refueling outage
and participation in plant startup testing or post-refueling
startup testing, Mr. Knobel has served during the last 12-1/2 years

in successive positions as a BWR startup engineer, BWR training manager, BWR outage manager, technical supervisor of BWR projects, manager of BWR operations engineering, principal engineer on the General Electric Internal Three Mile Island Task Force, and principal engineer consultant to Carolina Power & Light Company on the Three Mile Island Review at the Brunswick plant. Mr. Knobel has held a license as an SRO on the Dresden nuclear plant. Mr. Knobel has spent 16 months at the Brunswick plant as the General Electric representative supervising response to the Three Mile Island action items.

We conclude that the chance of erroneous instructions being issued by Mr. Knobel during the period before he receives his NRC license on the Brunswick plant is insignificant. His educational and experience credentials, his previous experience at the Brunswick plant and the fact that he has trained to take the SRO examination at Brunswick lead us to conclude that he is sufficiently qualified to carry out the responsibility of Manager-Operations.

- 2. The Brunswick Steam Electric plant is a two-unit station with a common control room shared by the two units. The minimum staffing by licensed operators required by the NRC for such a configuration is, per shift:
 - 1 Shift Supervisor (SRO license)
 - 3 Reactor Operators (RO license)

In July of 1982, this minimum staffing will increase by an additional SRO on each shift, to be stationed in the control room in accordance with the July 31, 1980 letter from D. G. Eisenhut to all licensees and

holders of construction permits, and confirmed by item I.A.1.3 of NUREG-0737. In accordance with NRC staffing guidance, each of the Shift Supervisors would report normally through an operations supervisor (day shift only) to the operations manager. In such a staffing arrangement, the Shift Supervisor could well be the senior person on site during back shift operation.

The staffing plan used by the licensee for the Brunswick plant involves a five shift operation. Each shift has a Shift Operations Supervisor (SRO licensed), thus providing 24-hour coverage at the plant by a person with operations supervisor qualifications, as contrasted to the normal case where there is one operations supervisor providing day shift coverage only. Four of the five shifts also have two Shift Foremen (SRO licensed) assigned, while the fifth shift has a single Shift Foreman. All shifts also have either three Control Operators (RO licensed) or two Control Operators and one Senior Control Operator (SRO licensed) assigned. In summary, three of the five shifts at Brunswick have three SROs and three ROs assigned while two of the shifts have four SROs and two ROs assigned.

We conclude that the staffing at the Brunswick plant is considerably in excess of minimum NRC requirements and is such as to provide assurance that senior licensed personnel are readily available to supervise plant operations.

Thus, we conclude that the CP&L request for a change to the Technical Specifications allowing Mr. Knobel to carry out the duties of Manager-Operations without an SRO license until he completes the SRO examination scheduled by the NRC should be granted. There is adequate assurance that such an exemption would not adversely impact plant safety or jeopardize the health and safety of the public.

ENVIRONMENTAL CONSIDERATION

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and pursuant to $10~\rm CFR~\$51.5(d)(4)$ that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of the amendments.

CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of accidents previously considered and do not involve a significant decrease in a safety margin, the amendments do 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 the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Date: February 3, 1982

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NOS. 50-325 AND 50-324

CAROLINA POWER & LIGHT COMPANY

NOTICE OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES

The U.S. Nuclear Regulatory Commission (the Commission) has issued Amendment Nos. 44 and 67 to Facility Operating License Nos. DPR-71 and DPR-62 issued to Carolina Power & Light Company (the licensee) which revised the Technical Specifications for operation of the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (the facility), located in Brunswick County, North Carolina. The amendments are effective as of the date of issuance.

The amendments revise the Technical Specifications to permit a specific individual to fill the Manager-Operations position during the interim period until the formal licensing requirements can be scheduled and completed.

The application for amendments 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 amendments. Prior public notice of the amendments was not required since the amendments do not involve a significant hazards consideration.

The Commission has determined that the issuance of the amendments will not result in any significant environmental impact and that pursuant to 10 CFR Section 51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of the amendments.

For further details with respect to this action, see (1) the application for amendments dated January 8, 1982, (2) Amendment Nos. 44 and 67 to License Nos. DPR-71 and DPR-62, and (3) the Commission's related Safety Evaluation. These items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C. and at the Southport-Brunswick County Library, 109 West 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 Licensing.

Dated at Bethesda, Maryland, this 3rd day of February 1982.

FOR THE NUCLEAR REGULATORY COMMISSION

Domenic B. Vassallo, Chief Operating Reactors Branch #2 Division of Licensing