

April 18, 1995

Mr. R. A. Anderson  
Vice President  
Brunswick Steam Electric Plant  
Carolina Power & Light Company  
Post Office Box 10429  
Southport, North Carolina 28461

SUBJECT: ISSUANCE OF AMENDMENT NO. 177 TO FACILITY OPERATING LICENSE NO. DPR-71 AND AMENDMENT NO. 208 TO FACILITY OPERATING LICENSE NO. DPR-62 REGARDING NUCLEAR ASSESSMENT SECTION - BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 (TAC NOS. M90000 AND M90001)

Dear Mr. Anderson:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 177 to Facility Operating License No. DPR-71 and Amendment No. 208 to Facility Operating License No. DPR-62 for Brunswick Steam Electric Plant, Units 1 and 2. The amendments change the Technical Specifications in response to your submittal dated July 22, 1994, as supplemented March 6, 1995.

The amendments change the Technical Specifications to implement a performance based assessment program, including corresponding organizational and functional changes. Specifically, the changes affect the independent review function, the independent assessment of plant activity and the Independent Safety Engineering Group. These functions will be performed by the Nuclear Assessment Section (NAS). The NAS's fundamental role will be to: (1) assist plant management in the early identification of issues that may prevent the plant from achieving quality, and (2) ensure effective correction of deficiencies.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's bi-weekly Federal Register Notice.

Sincerely,

(Original Signed By)

David C. Trimble, Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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PDR ADDCK 05000324  
P PDR

Docket Nos. 50-325 and 50-324

Enclosures:

1. Amendment No. 177 to License No. DPR-71
2. Amendment No. 208 to License No. DPR-62
3. Safety Evaluation

cc w/enclosures: Distribution - See next page  
See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 18, 1995

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Vice President  
Brunswick Steam Electric Plant  
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*David C. Trimble*

David C. Trimble, Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-325 and 50-324

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1. Amendment No. 177 to License No. DPR-71
2. Amendment No. 208 to License No. DPR-62
3. Safety Evaluation

cc w/enclosures:  
See next page

Mr. R. A. Anderson  
Carolina Power & Light Company

Brunswick Steam Electric Plant  
Units 1 and 2

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Memorandum Dated April 18, 1995

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

CAROLINA POWER & LIGHT COMPANY, et al.

DOCKET NO. 50-325

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 177  
License No. DPR-71

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by Carolina Power & Light Company (the licensee), dated July 22, 1994, as supplemented March 6, 1995, 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:

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P PDR

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No.177 , are hereby incorporated in the license. Carolina Power & Light Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



David B. Matthews, Director  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 18, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 177

FACILITY OPERATING LICENSE NO. DPR-71

DOCKET NO. 50-325

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove Pages

Insert Pages

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ADMINISTRATIVE CONTROLS

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6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

6.3 FACILITY STAFF QUALIFICATION

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions<sup>(a)</sup>, except for (1) the Manager - Environmental & Radiation Control 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 during 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 Manager - Training (BSEP) 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.

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(a) The requirement for the Manager - Operations to hold or have held a senior reactor operator license is exempted for a period of 18 months starting from June 13, 1991.

PROCEDURES, TESTS, AND EXPERIMENTS

6.5.2.4 The safety evaluation prepared in accordance with Specifications 6.5.2.1.a and 6.5.2.1.b above shall include a written determination, with basis, of whether or not the procedures, proposed tests and experiments, and changes thereto constitute an unreviewed safety question as defined in 10 CFR 50.59, or whether they involve a change to the Technical Specifications.

6.5.2.5 Following the nuclear safety review, the procedures required by Specification 6.8, other procedures that affect nuclear safety, proposed tests or experiments, and changes thereto (other than editorial or typographical) which have been determined to not involve an unreviewed safety question as defined in 10 CFR 50.59 or change to the Technical Specifications shall be approved prior to implementation by the General Manager - Brunswick Plant or his previously designated alternate.

MODIFICATIONS

6.5.2.6 The safety evaluation prepared in accordance with Specification 6.5.2.1.c above shall include a written determination, with basis, of whether or not the proposed modification is a change in the facility as described in the safety analysis report, involves a change to the Technical Specifications, or constitutes an unreviewed safety question as defined in 10 CFR 50.59.

6.5.2.7 Following the nuclear safety review, proposed modifications which have been determined to not involve an unreviewed safety question as defined in 10 CFR 50.59 or a change to the Technical Specifications shall be approved by the General Manager - Brunswick Plant or his previously designated alternate.

OPERATING LICENSE/TECHNICAL SPECIFICATIONS

6.5.2.8 The safety evaluation prepared in accordance with Specifications 6.5.2.1.d and 6.5.2.1.e above shall include a written preliminary determination, with basis, of whether or not the proposed Operating License/Technical Specification change(s) is a change in the facility as described in the safety analysis report.

6.5.2.9 Following the nuclear safety review of the safety evaluation prepared in accordance with Specifications 6.5.2.1.d and 6.5.2.1.e above and the associated proposed action, the request shall be:

- a. Reviewed by the Plant Nuclear Safety Committee in accordance with Specification 6.5.3.8.
- b. Reviewed by the Nuclear Assessment Section in accordance with Specification 6.5.4.9.

6.5.3 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)

FUNCTION

6.5.3.1 As an effective means for the regular review, overview, evaluation, and maintenance of plant operational safety, a Plant Nuclear Safety Committee (PNSC) shall be established.

6.5.3.2 The PNSC shall function through the utilization of subcommittees, audits, investigations, reports, and/or performance of reviews as a group.

COMPOSITION

6.5.3.3 The PNSC shall be composed of a chairman and seven to nine members. The members shall be from the following areas:

- Operations
- Maintenance
- Engineering
- Health Physics/Chemistry
- Regulatory Affairs
- Nuclear Assessment

6.5.3.4 The PNSC Chairman, alternate Chairmen, members and alternate members shall be designated in writing by the Director - Site Operations. Members shall be individuals who are unit manager level or above from the site management organization. Alternate members shall, as a minimum, meet equivalent qualification criteria as specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel.

QUORUM

6.5.3.5 The quorum of the PNSC necessary for the performance of the activities of these Technical Specifications shall consist of the Chairman (or his designated alternate) and four members (including alternates).

6.5.3.6 No more than two alternates shall be counted toward meeting the quorum requirement or participate as voting members of the PNSC at any one time.

MEETING FREQUENCY

6.5.3.7 The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate.

ACTIVITIES

6.5.3.8 The PNSC activities shall include the following:

- a. Review of all procedures required by Specification 6.8 and changes thereto (and any other procedures and changes thereto), any of which constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- b. Review of all proposed tests or experiments that constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- c. Review of all proposed modifications that constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- d. Review of all proposed changes to the Technical Specifications or Operating License, prior to implementation.
- e. Review of reports on violations of Technical Specifications including reports covering evaluation and recommendations to prevent recurrence to the Vice President - Brunswick Nuclear Plant.
- f. Performance of special reviews, investigations (or analyses), and reports thereon as requested by the Manager - Nuclear Assessment Section.
- g. Review of all REPORTABLE EVENTS.
- h. Review of facility operations to detect potential nuclear safety hazards.
- i. Annual review of the Security Plan.
- j. Annual review of the Emergency Plan.
- k. Review of accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Brunswick Nuclear Plant.
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.
- m. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Nuclear Assessment Section.

AUTHORITY

6.5.3.9 If there is a disagreement between recommendations of a majority of the PNSC and the actions contemplated by the General Manager - Brunswick Plant, the PNSC shall provide written notification within 24 hours to the Vice President - Brunswick Nuclear Plant. The course determined by the General Manager - Brunswick Plant to be the most conservative shall be followed.

RECORDS

6.5.3.10 The PNSC shall maintain written minutes of each PNSC meeting that, at a minimum, document the results of all PNSC activities performed under the provisions of these Technical Specifications. Copies shall be provided to the Vice President - Brunswick Nuclear Plant and the Manager - Nuclear Assessment Section.

6.5.4 NUCLEAR ASSESSMENT SECTION INDEPENDENT REVIEW PROGRAM

FUNCTION

6.5.4.1 The Nuclear Assessment Section shall function to provide independent review of significant plant changes, tests, and procedures; verify that REPORTABLE EVENTS are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer.

ORGANIZATION

6.5.4.2 The individuals assigned responsibility for independent reviews shall be qualified in specific disciplines. These individuals shall collectively have the experience and competence required to review activities in the following areas:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. non-destructive testing
- f. instrumentation and control
- g. radiological safety
- h. mechanical and electrical engineering
- i. administrative controls

ORGANIZATION (Continued)

- j. seismic and environmental
- k. quality assurance practices
- l. Other appropriate fields.

6.5.4.3 The Manager - Nuclear Assessment Section shall have a bachelor's degree in an engineering or related field and, in addition, shall have a minimum of ten years related experience, of which a minimum of five years shall be in the operation and/or design of nuclear power plants.

6.5.4.4 The individuals performing independent safety reviews shall have a bachelor's degree in an engineering or related field or equivalent and, in addition, shall have a minimum of five years related experience.

6.5.4.5 An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Nuclear Assessment Section, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

6.5.4.6 The documents submitted under 6.5.4.9 shall be reviewed by individuals meeting the requirements of 6.5.4.2 and 6.5.4.4 to ensure applicable disciplines are encompassed. Multiple reviews will be conducted on documents where required to meet applicable disciplines of 6.5.4.2.

6.5.4.7 Independent safety reviews shall be performed by individuals not directly involved with the activity under review or responsible for the activity under review.

6.5.4.8 The Nuclear Assessment Section independent safety review program shall be conducted in accordance with written, approved procedures.

REVIEW

6.5.4.9 The Nuclear Assessment Section shall perform reviews of the following:

- 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). These reviews are to verify that such changes, tests, or experiments do not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.

REVIEW (Continued)

- b. Proposed changes in procedures required by these Technical Specifications, proposed changes in the facility, or proposed tests or experiments, any of which involve a change in the Technical Specifications or an unreviewed safety question pursuant to 10 CFR 50.59(a)(2) prior to implementation.
- c. Proposed changes to the Technical Specifications or this Operating License prior to implementation.
- d. Violations, deviations and reportable events, which require reporting to the NRC in writing, such as:
  - 1. Violations of applicable codes, regulations, orders, technical specifications, license requirements or internal procedures or instructions having safety significance.
  - 2. Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components, and
  - 3. REPORTABLE EVENTS as specified in 10 CFR 50.73.
- e. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Section, deems appropriate for consideration or which is referred to the Manager - Nuclear Assessment Section, by the on-site operating organization, Plant Nuclear Safety Committee, or other functional organizational units within CP&L.

RECORDS

6.5.4.10 Results of Nuclear Assessment Section independent safety reviews shall be documented and retained.

6.5.5 NUCLEAR ASSESSMENT SECTION ASSESSMENT PROGRAM

6.5.5.1 Assessments of facility activities shall be performed by the Nuclear Assessment Section. Assessments will be performance based and will be scheduled based on plant performance and importance to safety but at a frequency not to exceed 24 months. These assessments shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training, and qualifications of the entire facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50.
- e. Any other area of facility operation considered appropriate by the Vice President - Brunswick Nuclear Plant.
- f. The Radiological Environmental Monitoring Program and the results thereof.
- g. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- h. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes.

6.5.5.2 Assessments of activities prescribed by the Code of Federal Regulations will be performed at the frequencies prescribed by the applicable regulation. These assessments shall encompass:

- a. Emergency Preparedness (per 10 CFR 50.54(t))
- b. Security (per 10 CFR 50.54(p))
- c. Radiation Protection (per 10 CFR 20.1101(c))

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6.5.6 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM

6.5.6.1 An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.

6.5.6.2 An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the Plant Nuclear Safety Committee - Brunswick Plant and shall be submitted to the Manager - Nuclear Assessment Section and the Vice President - Brunswick Nuclear Plant.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT SHUTDOWN within two hours.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Vice President - Brunswick Nuclear Plant shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Vice President - Brunswick Nuclear Plant. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Vice President - Brunswick Nuclear Plant, and the Manager - Nuclear Assessment Section within 14 days of the violation.

RECORDS RETENTION (Continued)

- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- l. Records of the service lives of all hydraulic and mechanical snubbers referenced in Section 3.7.5 including the data at which the service life commences and associated installation and maintenance records.
- m. Records of analyses required by the radiological environmental monitoring program.
- n. Records of meetings of the PNSC. |
- o. Records of Independent Review. |

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "Control Device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

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\* Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

CAROLINA POWER & LIGHT COMPANY, et al.

DOCKET NO. 50-324

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.208  
License No. DPR-62

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by Carolina Power & Light Company (the licensee), dated July 22, 1994, as supplemented March 6, 1995, 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) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 208, are hereby incorporated in the license. Carolina Power & Light Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



David B. Matthews, Director  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 18, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 208

FACILITY OPERATING LICENSE NO. DPR-62

DOCKET NO. 50-324

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

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6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

6.3 FACILITY STAFF QUALIFICATION

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions<sup>(a)</sup>, except for (1) the Manager - Environmental & Radiation Control 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 during 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 Manager - Training (BSEP) 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.

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(a) The requirement for the Manager - Operations to hold or have held a senior reactor operator license is exempted for a period of 18 months starting from June 13, 1991.

PROCEDURES, TESTS, AND EXPERIMENTS

6.5.2.4 The safety evaluation prepared in accordance with Specifications 6.5.2.1.a and 6.5.2.1.b above shall include a written determination, with basis, of whether or not the procedures, proposed tests and experiments, and changes thereto constitute an unreviewed safety question as defined in 10 CFR 50.59, or whether they involve a change to the Technical Specifications.

6.5.2.5 Following the nuclear safety review, the procedures required by Specification 6.8; other procedures that affect nuclear safety, proposed tests or experiments, and changes thereto (other than editorial or typographical) which have been determined to not involve an unreviewed safety question as defined in 10 CFR 50.59 or change to the Technical Specifications shall be approved prior to implementation by the General Manager - Brunswick Plant or his previously designated alternate.

MODIFICATIONS

6.5.2.6 The safety evaluation prepared in accordance with Specification 6.5.2.1.c above shall include a written determination, with basis, of whether or not the proposed modification is a change in the facility as described in the safety analysis report, involves a change to the Technical Specifications, or constitutes an unreviewed safety question as defined in 10 CFR 50.59.

6.5.2.7 Following the nuclear safety review, proposed modifications which have been determined to not involve an unreviewed safety question as defined in 10 CFR 50.59 or a change to the Technical Specifications shall be approved by the General Manager - Brunswick Plant or his previously designated alternate.

OPERATING LICENSE/TECHNICAL SPECIFICATIONS

6.5.2.8 The safety evaluation prepared in accordance with Specifications 6.5.2.1.d and 6.5.2.1.e above shall include a written preliminary determination, with basis, of whether or not the proposed Operating License/Technical Specification change(s) is a change in the facility as described in the safety analysis report.

6.5.2.9 Following the nuclear safety review of the safety evaluation prepared in accordance with Specifications 6.5.2.1.d and 6.5.2.1.e above and the associated proposed action, the request shall be:

- a. Reviewed by the Plant Nuclear Safety Committee in accordance with Specification 6.5.3.8.
- b. Reviewed by the Nuclear Assessment Section in accordance with Specification 6.5.4.9.

6.5.3 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)

FUNCTION

6.5.3.1 As an effective means for the regular review, overview, evaluation, and maintenance of plant operational safety, a Plant Nuclear Safety Committee (PNSC) shall be established.

6.5.3.2 The PNSC shall function through the utilization of subcommittees, audits, investigations, reports, and/or performance of reviews as a group.

COMPOSITION

6.5.3.3 The PNSC shall be composed of a chairman and seven to nine members. The members shall be from the following functional areas:

- Operations
- Maintenance
- Engineering
- Health Physics/Chemistry
- Regulatory Affairs
- Nuclear Assessment

6.5.3.4 The PNSC Chairman, alternate Chairmen, members and alternate members shall be designated in writing by the Director - Site Operations. Members shall be individuals who are unit manager level or above from the site management organization. Alternate members shall, as a minimum, meet equivalent qualification criteria as specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel.

QUORUM

6.5.3.5 The quorum of the PNSC necessary for the performance of the activities of these Technical Specifications shall consist of the Chairman (or his designated alternate) and four members (including alternates).

6.5.3.6 No more than two alternates shall be counted toward meeting the quorum requirement or participate as voting members of the PNSC at any one time.

MEETING FREQUENCY

6.5.3.7 The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate.

ACTIVITIES

6.5.3.8 The PNSC activities shall include the following:

- a. Review of all procedures required by Specification 6.8 and changes thereto (and any other procedures and changes thereto), any of which constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- b. Review of all proposed tests or experiments that constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- c. Review of all proposed modifications that constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- d. Review of all proposed changes to the Technical Specifications or Operating License, prior to implementation.
- e. Review of reports on violations of Technical Specifications including reports covering evaluation and recommendations to prevent recurrence to the Vice President - Brunswick Nuclear Plant.
- f. Performance of special reviews, investigations (or analyses), and reports thereon as requested by the Manager - Nuclear Assessment Section.
- g. Review of all REPORTABLE EVENTS.
- h. Review of facility operations to detect potential nuclear safety hazards.
- i. Annual review of the Security Plan.
- j. Annual review of the Emergency Plan.
- k. Review of accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Brunswick Nuclear Plant.
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.
- m. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Nuclear Assessment Section.

AUTHORITY

6.5.3.9 If there is a disagreement between recommendations of a majority of the PNSC and the actions contemplated by the General Manager - Brunswick Plant, the PNSC shall provide written notification within 24 hours to the Vice President - Brunswick Nuclear Plant. The course determined by the General Manager - Brunswick Plant to be the most conservative shall be followed.

RECORDS

6.5.3.10 The PNSC shall maintain written minutes of each PNSC meeting that, at a minimum, document the results of all PNSC activities performed under the provisions of these Technical Specifications. Copies shall be provided to the Vice President- Brunswick Nuclear Plant and the Manager - Nuclear Assessment Section.

6.5.4 NUCLEAR ASSESSMENT SECTION INDEPENDENT REVIEW PROGRAM

FUNCTION

6.5.4.1 The Nuclear Assessment Section shall function to provide independent review of significant plant changes, tests, and procedures; verify that REPORTABLE EVENTS are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer.

ORGANIZATION

6.5.4.2 The individuals assigned responsibility for independent reviews shall be qualified in specific disciplines. These individuals shall collectively have the experience and competence required to review activities in the following areas:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. non-destructive testing
- f. instrumentation and control
- g. radiological safety
- h. mechanical and electrical engineering
- i. administrative controls

ORGANIZATION (Continued)

- j. seismic and environmental
- k. quality assurance practices
- l. Other appropriate fields.

6.5.4.3 The Manager - Nuclear Assessment Section shall have a bachelor's degree in an engineering or related field and, in addition, shall have a minimum of ten years related experience, of which a minimum of five years shall be in the operation and/or design of nuclear power plants.

6.5.4.4 The individuals performing independent safety reviews shall have a bachelor's degree in an engineering or related field or equivalent and, in addition, shall have a minimum of five years related experience.

6.5.4.5 An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Nuclear Assessment Section, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

6.5.4.6 The documents submitted under 6.5.4.9 shall be reviewed by individuals meeting the requirements of 6.5.4.2 and 6.5.4.4 to ensure applicable disciplines are encompassed. Multiple reviews will be conducted on documents where required to meet applicable disciplines of 6.5.4.2.

6.5.4.7 Independent safety reviews shall be performed by individuals not directly involved with the activity under review or responsible for the activity under review.

6.5.4.8 The Nuclear Assessment Section independent safety review program shall be conducted in accordance with written, approved procedures.

REVIEW

6.5.4.9 The Nuclear Assessment Section shall perform reviews of the following:

- 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). These reviews are to verify that such changes, tests, or experiments do not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.

REVIEW (Continued)

- b. Proposed changes in procedures required by these Technical Specifications, proposed changes in the facility, or proposed tests or experiments, any of which involve a change in the Technical Specifications or an unreviewed safety question pursuant to 10 CFR 50.59(a)(2) prior to implementation.
- c. Proposed changes to the Technical Specifications or this Operating License prior to implementation.
- d. Violations, deviations and reportable events, which require reporting to the NRC in writing, such as:
  - 1. Violations of applicable codes, regulations, orders, technical specifications, license requirements or internal procedures or instructions having safety significance.
  - 2. Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components, and
  - 3. REPORTABLE EVENTS as specified in 10 CFR 50.73.
- e. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Section, deems appropriate for consideration or which is referred to the Manager - Nuclear Assessment Section, by the on-site operating organization, Plant Nuclear Safety Committee (PNSC), or other functional organizational units within CP&L.

RECORDS

6.5.4.10 Results of Nuclear Assessment Section independent safety reviews shall be documented and retained.

6.5.5 NUCLEAR ASSESSMENT SECTION ASSESSMENT

6.5.5.1 Assessments of facility activities shall be performed by the Nuclear Assessment Section. Assessments will be performance based and will be scheduled based on plant performance and importance to safety but at a frequency not to exceed 24 months. These assessments shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training, and qualifications of the entire facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50.
- e. Any other area of facility operation considered appropriate by the Vice President - Brunswick Nuclear Plant.
- f. The Radiological Environmental Monitoring Program and the results thereof.
- g. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- h. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes.

6.5.5.2 Assessments of activities prescribed by the Code of Federal Regulations will be performed at the frequencies prescribed by the applicable regulation. These assessments shall encompass:

- a. Emergency Preparedness (per 10 CFR 50.54(t))
- b. Security (per 10 CFR 50.54(p))
- c. Radiation Protection (per 10 CFR 20.1101(c))

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6.5.6 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM

6.5.6.1 An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.

6.5.6.2 An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the Plant Nuclear Safety Committee - Brunswick Plant and shall be submitted to the Manager - Nuclear Assessment Section and the Vice President - Brunswick Nuclear Plant.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT SHUTDOWN within two hours.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Vice President - Brunswick Nuclear Plant shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the General Manager - Brunswick Plant. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Vice President - Brunswick Nuclear Plant, and the Manager - Nuclear Assessment Section within 14 days of the violation.

RECORDS RETENTION (Continued)

- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- l. Records of the service lives of all hydraulic and mechanical snubbers referenced in Section 3.7.5 including the data at which the service life commences and associated installation and maintenance records.
- m. Records of analyses required by the radiological environmental monitoring program.
- n. Records of meetings of the PNSC.
- o. Records of Independent Review.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "Control Device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

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\* Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 177 TO FACILITY OPERATING LICENSE NO. DPR-71  
AND AMENDMENT NO. 208 TO FACILITY OPERATING LICENSE NO. DPR-62

CAROLINA POWER & LIGHT COMPANY

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2

DOCKET NOS. 50-325 AND 50-324

1.0 INTRODUCTION

By letter dated July 22, 1994, as supplemented March 6, 1995, Carolina Power & Light Company (CP&L or licensee) requested changes to the Administrative Controls Section of the Brunswick Steam Electric Plant, Units 1 and 2 (BSEP), Technical Specifications (TS). These changes supersede the TS changes requested in the letter dated September 15, 1993. The following is a brief description and our evaluation of the requested changes. The March 6, 1995 letter did not expand the scope of the original Federal Register notice or change the no significant hazards determination.

2.0 EVALUATION

a. Section 6.2.3 - Project Assessment Section

CP&L proposes to delete this section from the TS as they are no longer required to maintain this function because the Brunswick Improvement Plan (BIP) order that requires the function has been rescinded. However, CP&L states that this function will be integrated into the Nuclear Assessment Section (NAS) Assessment Program described in the revised Section 6.5.5.

The NRC staff finds this change acceptable because there is no NRC requirement for CP&L to maintain this function at BSEP.

b. Sections 6.5.2.9, 6.5.3.8, 6.5.4, 6.5.4.3, 6.5.4.5, and 6.5.4.8

CP&L plans to delete the reference to the Nuclear Assessment Department (NAD), because the NAD will no longer exist, and to replace the reference to it in these sections with the new Nuclear Assessment Section (NAS) that will report to the Vice President, Brunswick Nuclear Plant.

The NRC staff finds this change acceptable as it reflects the revised organization.

c. Section 6.5.3 - Plant Nuclear Safety Committee (PNSC)

CP&L proposes to make numerous changes to this section. They include:

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1. Revising the description of the organizational provisions of the PNSC by deleting reference to members by position title. This would be replaced by specifying functional areas and qualification requirements by organizational level.
2. Reformatting the subsections.
3. Redefining the quorum and alternate requirements.
4. Deleting reference to the position of Manager, Nuclear Assessment Department with respect to the distribution of reports and PNSC minutes, and deleting the Vice President, Nuclear Services from receiving notification of disagreements between the Plant General Manager and the PNSC.

The NRC staff finds these changes acceptable as they provide consistency between the other CP&L nuclear plants, and the changes meet the appropriate acceptance criteria of Section 13.4 of NUREG 0800, the Standard Review Plan, and they reflect the revised organization.

d. Section 6.5.4 - Nuclear Assessment Section (NAS) Independent Review Program

CP&L proposes to modify this description by:

1. Changing the phrase "specified in technical" to "qualified in specific" areas of expertise required for individuals performing independent reviews, and deleting the phrase in Subsection 1. "associated with the unique characteristics of the nuclear power plants."
2. Changing the term "academic" to "bachelor's" degree.
3. Revising the requirement that "at least three individuals shall review each item" to "the documents shall be reviewed by individuals meeting the requirements of 6.5.4.2 and 6.5.4.4 to ensure applicable disciplines are encompassed and that multiple reviews will be conducted on documents where required to meet applicable disciplines of 6.5.4.2."
4. Reformatting by combining subsections 6.5.4.9.a, 6.5.4.9.b and subsection 6.5.4.9.c under a revised 6.5.4.9.a and 6.5.4.9.b; and changing the phrase "changes to procedures required by Specification 6.8" to "changes in procedures required by these Technical Specifications."

5. Relocating the requirements of subsection 6.5.4.9.d to subsection 6.5.4.9.c and adding the phrase "prior to implementation."
6. Relocating the requirements of subsection 6.5.4.9.e to subsections 6.5.4.9.d.1 and 6.5.4.9.d.2, and modifying the wording to be consistent with ANSI N18.7.
7. Relocating the requirements of subsection 6.5.4.9.f to subsection 6.5.4.9.d.2.
8. Relocating the requirements of subsection 6.5.4.9.g to subsection 6.5.4.9.d.3.
9. Deleting the existing requirement in subsection 6.5.4.9.h that "independent review be performed of the reports and minutes of the PNSC."
10. Relocating the requirements of subsection 6.5.4.9.i to subsection 6.5.4.9.e.
11. Combining the existing requirements of subsections 6.5.4.10 and 6.5.4.11 into subsection 6.5.4.10 and modifying the wording to be consistent with ANSI N18.7. Any identified adverse condition resulting from Independent Reviews are addressed as part of the Corrective Action Program (CAP),
12. Deleting the requirements of subsections 6.5.4.11.a & b. Identified adverse conditions resulting from the Independent review are addressed as part of the CAP as identified in the Quality Assurance program.

It should be noted that this function now reports to the Site Vice President rather than to the offsite position of Executive Vice President, Nuclear Generation.

The NRC staff finds these changes acceptable as they are editorial in nature, conform to the Improved Standard Technical Specifications (ISTS), meet the appropriate section of ANSI N18.7, and reflect the revised organization. In addition, with respect to the new NAS reporting relationship the NRC staff considers that the acceptability of this arrangement is, in part, based on the effectiveness of the new Nuclear Services Department Performance Evaluation Section (PES) that provides an offsite check and balance to the onsite assessment functions. The PES is described in Section 17.3.3.2 of the revised Quality Assurance program. The licensee provided a detailed description of the PES assessment activities with respect to the NAS, including the specific

oversight function of assessing the NAS performance, in their March 6, 1995, letter. The NRC finds this description acceptable.

e. Section 6.5.5 - Nuclear Assessment Section (NAS) Assessment Program

CP&L proposes to retitle this section from the current title of Nuclear Assessment Department Audit Program to NAS Assessment Program. This changes the reporting of this function to the onsite Vice President Nuclear. The change deletes the specific audit frequencies and establishes a maximum frequency of 24 months between assessments. The change also alters the function from an audit bases to a performance based assessment program. Subsection 6.5.5.2.k, with respect to the audit of activities required by the Quality Assurance program, and subsections 6.5.5.3 through 6.5.5.9 with respect to administrative provisions of the current audit program have been deleted.

The NRC staff finds these changes acceptable as they conform to the ISTS and Sections 13.4 and 17.3 of NUREG 0800, the Standard Review Plan. With respect to this function reporting to the Site Vice President see our conclusion with respect to Section 6.5.4.

3.0 SUMMARY

The NRC staff finds the changes requested by CP&L letter dated July 22, 1994, as supplemented March 6, 1995, to the Administrative Controls Section of the Technical Specifications for Brunswick Units 1 & 2 acceptable as they meet the appropriate acceptance criteria of Sections 13.4 and 17.3 of NUREG 0800, the Standard Review Plan, and conform to the ISTS.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of North Carolina official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: F. Allenspach

Date: April 18, 1995