

November 4, 1998

Mr. J. S. Keenan, Vice President  
Brunswick Steam Electric Plant  
Carolina Power & Light Company  
Post Office Box 10429  
Southport, North Carolina 28461

SUBJECT: ISSUANCE OF AMENDMENT NO. 204 TO FACILITY OPERATING LICENSE  
NO. DPR-71 AND AMENDMENT NO. 234 TO FACILITY OPERATING  
LICENSE NO. DPR-62 REGARDING QUALIFICATIONS OF OPERATIONS  
DEPARTMENT MANAGEMENT PERSONNEL - BRUNSWICK STEAM  
ELECTRIC PLANT, UNITS 1 AND 2 (TAC NOS. MA3398 AND MA3399)

Dear Mr. Keenan:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 204 to Facility Operating License No. DPR-71 and Amendment No. 234 to Facility Operating License No. DPR-62 for Brunswick Steam Electric Plant, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated August 17, 1998.

The amendments revise Technical Specification 5.2.2.f regarding the senior reactor operator licensing requirement for the operations manager.

A copy of the related Safety Evaluation is 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-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-325  
and 50-324

Enclosures:

1. Amendment No. 204 to  
License No. DPR-71
2. Amendment No. 234 to  
License No. DPR-62
3. Safety Evaluation

cc w/enclosures: See next page

FILENAME - G:\BRUNSWIC\BRA3398.AMD \*See previous concurrence

LA:PDII-2	PM:PDII-3*	TSB*	OGC*	NOLB	D:PDII-3*
EDunnington*	DTrimble	WBeckner		11/3/98 RMD	FHebdon
10/15 /98	11/2 /98	10/16 /98	11/2 /98	11/3/98	11/2 /98
Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No

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

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

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*David C. Trimble*

David C. Trimble, Project Manager  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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1. Amendment No. 204 to  
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3. Safety Evaluation

cc w/enclosures: See next page

Mr. J. S. Keenan  
Carolina Power & Light Company

cc:

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Brunswick Steam Electric Plant  
Units 1 and 2

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Carolina Power & Light Company  
Post Office Box 10429  
Southport, NC 28461-0429

AMENDMENT NO. 204 TO FACILITY OPERATING LICENSE NO. DPR-71 - BRUNSWICK,  
UNIT 1 AMENDMENT NO. 234 TO FACILITY OPERATING LICENSE NO. DPR-62 -  
BRUNSWICK, UNIT 2

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G. Hill (4)

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C. Patterson

cc: Brunswick Service List

1000008



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. 204  
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 August 17, 1998, 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 the first paragraph of 2.C.(2) of Facility Operating License No. DPR-71 is hereby amended to read as follows:

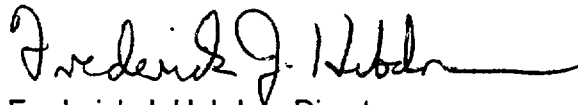
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(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 204 , 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 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Frederick J. Hebdon, Director  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: November 4, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 204

FACILITY OPERATING LICENSE NO. DPR-71

DOCKET NO. 50-325

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

Remove page

5.0-3

Insert Page

5.0-3

## 5.2 Organization

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### 5.2.2 Facility Staff (continued)

- b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, when either unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room. With one unit in MODE 1, 2, or 3 and the other unit defueled, the minimum shift crew shall include a total of two SROs and two ROs.
  - c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
  - d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
  - e. Administrative procedures shall be developed and implemented to limit the working hours of facility staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel). These procedures shall meet the working hour guidelines published by the Nuclear Regulatory Commission in Generic Letter 82-12.
  - f. The operations manager or assistant operations manager shall hold an SRO license.
  - g. The shift technical advisor shall serve in an advisory capacity to the shift superintendent on matters pertaining to the engineering aspects assuring safe operation of the unit when either unit is in MODE 1, 2, or 3.
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**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. 234  
License No. DPR-62

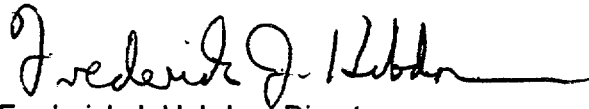
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by Carolina Power & Light Company (the licensee), dated August 17, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's 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 the first paragraph of 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. 234 , 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 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Frederick J. Hebdon, Director  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: November 4, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 234

FACILITY OPERATING LICENSE NO. DPR-62

DOCKET NO. 50-324

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

Remove page

5.0-3

Insert Page

5.0-3

## 5.2 Organization

---

### 5.2.2 Facility Staff (continued)

- b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, when either unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room. With one unit in MODE 1, 2, or 3 and the other unit defueled, the minimum shift crew shall include a total of two SROs and two ROs.
  - c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
  - d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
  - e. Administrative procedures shall be developed and implemented to limit the working hours of facility staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel). These procedures shall meet the working hour guidelines published by the Nuclear Regulatory Commission in Generic Letter 82-12.
  - f. The operations manager or assistant operations manager shall hold an SRO license.
  - g. The shift technical advisor shall serve in an advisory capacity to the shift superintendent on matters pertaining to the engineering aspects assuring safe operation of the unit when either unit is in MODE 1, 2, or 3.
-



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 204 TO FACILITY OPERATING LICENSE NO. DPR-71

AND AMENDMENT NO. 234 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 August 17, 1998, Carolina Power and Light Company (CP&L or the licensee) requested amendments to Facility Operating Licenses Nos. DPR-71 and DPR-62 for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, respectively.

The proposed amendments would revise Technical Specification (TS) 5.2.2.f to state, "The operations manager or assistant operations manager shall hold an SRO [senior reactor operator] license." Currently TS 5.2.2.f states, "The operations manager shall hold or have held an SRO license for either the Brunswick Plant or a similar plant."

**2.0 EVALUATION**

The licensee presented the following information in support of the proposed amendments:

- (a) Improved technical specifications (ITS) were issued for the Brunswick plant on June 5, 1998, and the proposed changes requiring either the operations manager or assistant operations manager to hold an SRO license are consistent with the wording of TS 5.2.2.f in the governing document for ITS (NUREG-1433, Revision 1, April 1995, "Standard Technical Specifications General Electric Plants, BWR/4");
- (b) The proposed changes are consistent with the wording of Technical Specification Traveler Form (TSTF) 65, Revision 1 (approved by the NRC in a letter dated November 10, 1994), that requested the use of generic job position titles (denoted by the use of lower case letters in the titles) in the ITS;
- (c) The proposed changes are consistent with 10 CFR 50.54(l), which requires individuals responsible for directing the licensed activities of licensed operators to hold an SRO license;
- (d) The proposed changes ensure that operations management maintains in-depth, plant-specific knowledge and are consistent with the intent of ANSI-18.1-1971, "Selection and Training of Nuclear Power Plant Personnel;" and

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- (e) Requiring the operations manager or assistant operations manager to hold an SRO license will ensure that operations management can effectively interface with day-to-day operational aspects of control room activities and can communicate operational issues to higher levels of plant and utility management.

The NRC staff has reviewed the proposed changes to TS 5.2.2.f. and agrees that the changes are consistent with the wording of NUREG-1433 and TSTF-65. Further, the staff has confirmed through a discussion with the licensee on September 24, 1998, that, coincident with NRC approval of these proposed amendments, the licensee will implement an already-drafted change to the Brunswick Updated Final Safety Analysis Report (UFSAR) to include a cross-reference between the Brunswick Nuclear Plant (BNP) organizational title (Manager - Shift Operations - BNP) and the generic title of assistant operations manager. Such a linkage was previously established in the UFSAR at the time of ITS implementation on July 9, 1998, for the generic operations manager title (corresponding to the organizational title of Manager - Operations - BNP). A copy of the UFSAR change was forwarded to the NRC staff on September 24, 1998.

In conclusion, the staff finds that the proposed changes to TS 5.2.2.f are consistent with the wording of NUREG-1433 and TSTF-65, and with 10 CFR 50.54(l). Furthermore, the staff agrees with the licensee that the proposed changes should ensure that operations management will maintain in-depth, plant-specific knowledge of the Brunswick facility, and thus the changes are consistent with the intent of ANSI-18.1-1971. Based upon these findings, the staff has determined that the proposed changes are acceptable.

### 3.0 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.

### 4.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, these amendments meet 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 these amendments.

### 5.0 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: D. Trimble

Date: November 4, 1998