



**CP&L**

A Progress Energy Company

**AUG 26 2002**

SERIAL: BSEP 02-0147

10 CFR 50.54 (q)

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62  
REVISIONS TO PLANT EMERGENCY PROCEDURES

Ladies and Gentlemen:

In accordance with 10 CFR 50.54 (q) and 10 CFR 50, Appendix E, Section V, Carolina Power & Light (CP&L) Company is submitting revisions to the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, plant emergency procedures. CP&L has evaluated the revisions, in accordance with 10 CFR 50.54 (q), and has determined that the changes do not decrease the effectiveness of the Radiological Emergency Response Plan; and the Plan, as changed, continues to meet the standards of 10 CFR 50.47 (b) and the requirements of 10 CFR 50, Appendix E. A list of the revised procedures is provided in Enclosure 1. A summary of the revisions is provided in Enclosure 2. Enclosure 3 contains copies of the revised procedures.

There are no regulatory commitments being made in this submittal. Please refer any questions regarding this submittal to Mr. Gene Atkinson, Supervisor – Emergency Preparedness, at (910) 457-2056.

Sincerely,

Edward T. O'Neil  
Manager - Regulatory Affairs  
Brunswick Steam Electric Plant

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Enclosures:

1. List of Revised Plant Emergency Procedures
2. Summary of Revisions
3. Copies of Revised Procedures

cc (with enclosures):

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ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
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List of Revised Plant Emergency Procedures

Procedure	Revision	Effective Date	Title
OERP	59	08/01/02	Radiological Emergency Response Plan
OPEP-02.1	48	08/01/02	Initial Emergency Actions

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
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Summary of Revisions

A. OERP, "Radiological Emergency Response Plan," Revision 59:

1. Deleted reference to specific reactor thermal power from Section 1.1.1 due to changes resulting from power uprate.
2. Corrected grammatical errors in Section 3.0, Emergency Response Organization, and Sections 4.1.4 and 4.1.5 without changing intent.
3. Added Joint Information Center to Table 3.5-1, Notification and Activation of Principal Emergency Response Organizations, as enhancement.
4. Deleted reference to Babcock and Wilcox as contractor vendor for analysis of post accident samples in Section 3.7.1 and reworded Section 5.7.6 to include the Harris Nuclear Plant as an additional facility capable of analyzing post accident samples.
5. Deleted reference to wind direction in Section 4.2.3, paragraph 2 description of factors used to determine atmospheric dispersion conditions.
6. Changed "precalculated dispersion factors" to "calculated dispersion factors" in Section 4.2.3, paragraph 2 description of evaluation of radiation levels downwind from the plant.
7. Changed "plant computer systems" to "dose assessment program" in Section 4.2.3, paragraph 4 for clarification describing equipment available for dose projection calculations.
8. Changed "safety information calendars" to "safety information map brochures" as correction in Section 4.4.7.1 to reflect that safety information is distributed to transient population in a brochure which contains the same safety information as a calendar.
9. Deleted dose-specific information from Section 4.4.7.4 reference to sheltering of special populations based on dose due to State having responsibility for dose considerations versus plant.
10. Corrected typographical errors in Table 4.4-4, Protection Factor (PF) of Various Vehicles and Structures and Section 4.4.7.2.
11. Added security threat information in Section 5.4.

12. Revised Emergency Action Level (EAL) Flow Chart 1 and EAL Flow Chart 2 from Revision 47 to 48 due to changes in EALs.

B. OPEP-02.1, "Initial Emergency Actions," Revision 48:

1. Added NUREG-0654 as a reference in Section 2.16.
2. Corrected chemistry units from  $\mu\text{Ci/ml}$  to  $\mu\text{Ci/gm}$  in Sections 3.1, 3.2, and 3.3 to be consistent with Technical Specifications and Chemistry data reports.
3. Revised Section 4.3 definition for "Adequate core cooling" to be consistent with definition in Emergency Operating Procedure (EOP) User Guide.
4. Added definition for Fission Product Barrier Loss as Section 4.6
5. Added definitions for "Valid" and "Unplanned" as Sections 4.8 and 4.9.
6. Reworded information describing fire reporting activities in Section 6.4 due to redundancy with General Fire Plan.
7. Corrected "REP" to "OERP" in Section 6.4 note.
8. Corrected title of OPEP-02.1.1 in Section 6.5.3.
9. Renumbered all initiating conditions in Attachment 1 with six-digit numbering scheme as an identifier to tie procedure text to EAL Flow Charts 1 and 2 information for user friendliness.
10. Revised EALs in Attachment 1, Sections 1.3, 1.4, 2.2, 2.3, 2.4, 3.2, 3.3, 3.4, 4.2, 5.3, 5.4, 7.1, 9.1, 9.2, 11.3, 11.4, 12.2, 12.3, 12.4, and 14.3 for editorial changes, enhancements, and clarifications, where appropriate, using the technical bases provided for example EALs contained in NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels" and guidance in Regulatory Guide 1.101, Emergency Preparedness for Nuclear Power Reactors (Revision 3). Revision also included a title change from "Specific LCOs" to "Fission Product Barriers and Specific LCOs" in Section 12.0 and relocation of fission product barrier information to Section 12.0 to improve assessment evaluation.
11. Revised EALs in Attachment 1, Sections 11.1 and 11.2 based on information in NRC Security Advisory on security threats.
12. Changed EAL Flow Charts 1 and 2 as follows:
  - a. Changed EAL flow paths for Fire, Loss of Monitors or Alarms or Communications Capability, Security Threats, Fission Product Barriers and Specific LCOs, Main Steam Line Break, Abnormal Primary Leak Rate, and Loss of Shutdown Function: Decay Heat and Reactivity, to reflect EAL changes in OPEP-02.1, Attachment 1.

- b. Corrected typographical errors and changed format, as necessary, to improve user friendliness without changing intent.
- c. Added additional information in flow paths for Abnormal Radiological Effluent or Radiation Levels, Hazards to Plant Operations, Natural Events, and Shift Superintendent/Site Emergency Coordinator Judgments for consistency with OPEP-02.1 text.
- d. Renumbered initiating conditions with six-digit numbering scheme as identifier to tie flow path to OPEP-02.1, Attachment 1, for user friendliness.

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Enclosure 3  
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ENCLOSURE 3

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Copies of Revised Procedures