

CP&L

Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

SERIAL: NLS-90-197
10CFR50.90
TSC 90TSB13

JAN 15 1991

G. E. VAUGHN
Vice President
Nuclear Services Department

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications for the Brunswick Steam Electric Plant (BSEP). The proposed change revises Section 6.0, "Administrative Controls," of the Technical Specifications to reflect changes in the organizational structure of CP&L.

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

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Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

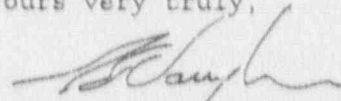
Enclosure 3 details the basis for the Company's determination that the proposed changes require no environmental assessment.

Enclosures 4 and 5 provide the proposed Technical Specification pages for each unit.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendments, once approved by the NRC, be issued with an effective date to be no later than 60 days from the issuance of the amendment.

Please refer any questions regarding this submittal to Mr. M. R. Oates at (919) 546-6063.

Yours very truly,



G. E. Vaughn

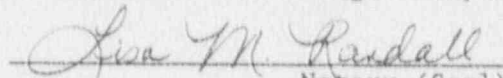
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Enclosures:

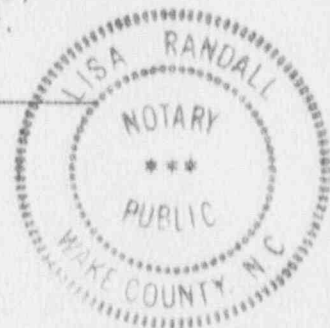
1. Basis for Change Request
2. 10CFR50.92 Evaluation
3. Environmental Consideration
4. Unit 1 Technical Specification Pages
5. Unit 2 Technical Specification Pages

cc: Mr. Dayne H. Brown
Mr. S. D. Ebnetter
Mr. N. B. Le
Mr. R. L. Prevatte

G. E. Vaughn, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires: 6-7-93



ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

BASIS FOR CHANGE REQUEST

Proposed Changes:

Creation of the Nuclear Assessment Department (NAD) requires that the Technical Specifications be modified to reflect changes in the organizational structure. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change. The proposed change modifies the following sections of the Technical Specifications as indicated:

Section 6.2

6.2.3 Revised to reflect that the Project Assessment (PA) Group of the Nuclear Assessment Department (NAD) shall assume the functions, responsibilities and authority currently described in this section for the Onsite Nuclear Safety (ONS) unit of the Nuclear Services Department.

Section 6.5

6.5.2.9 Revised to specify that in accordance with Specification 6.5.4.9 the NAD rather than the Corporate Nuclear Safety Section (CNSS) shall review safety evaluations prepared in accordance with 6.5.2.1.d and 6.5.2.1.e.

6.5.3.8 Revised to specify that the Manager - NAD rather than the Manager - CNSS be a recipient of reports covering evaluations and recommendations to prevent recurrence of violation of Technical Specifications. Revised to authorize the Manager - NAD rather than the Manager - CNSS to request the Plant Nuclear Safety Committee (PNSC) to perform special reviews, investigations (or analyses) and reports. Revised to require forwarding of PNSC reports covering evaluation, recommendations and disposition of corrective action to prevent recurrence of accidental, unplanned or uncontrolled radioactive releases to the Manager - NAD rather than the Manager - CNSS.

6.5.3.9 Revised to specify that the Manager - NAD rather than the Vice - President Nuclear Services be the recipient of the 24 hour written notification of a disagreement between recommendations of a majority of the PNSC and the actions contemplated by the General Manager - Brunswick Plant.

6.5.3.10 Revised to require submittal of copies of written PNSC meeting minutes to the Manager - NAD rather than the Manager - CNSS.

6.5.4 Revised to reassign to the NAD rather than the CNSS responsibility for administering the independent review program described in this section. Revised to define the qualifications for the Manager - NAD rather than the Manager - CNSS. Revised to address documentation, distribution and summation of NAD reviews, recommendations, and concerns rather than those of the CNSS.

6.5.5 Revised to reassign to the NAD rather than the Quality Assurance Auditing Unit, responsibility for performing audits of facility activities described in Technical Specification 6.5.5.2. Revised to authorize the Manager - NAD rather than the Manager - Quality Assurance Services Section, responsibility for administering the NAD audit program and approving individuals selected to conduct audits. Also, revises distribution of audit reports to delete Vice - President Nuclear Services due to this function being reassigned to NAD.

Section 6.6

6.6.1 Revised to specify that the Manager - NAD rather than the Manager - CNSS be a recipient of REPORTABLE EVENT reports.

Section 6.7

6.7.1 Revised to specify that the Manager - NAD rather than the Manager - CNSS shall be notified in the event a Safety Limit is violated. Revised to specify that the Manager - NAD rather than the Manager - CNS shall be a recipient of Safety Limit violation reports.

Section 6.10

6.10.2 Revised to require that records of independent review performed by the NAD shall be retained for the duration of the facility operating license.

Basis

The content required in the Administrative Controls Section of the Technical Specifications is specified in 10 CFR 50.36c(5). The regulation requires that the Technical Specifications contain the controls and provisions that are necessary to assure operation of the facility in a safe manner.

Creation of the Nuclear Assessment Department (NAD) requires that the Technical Specifications be modified to reflect changes in the organizational structure. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

The independent review function currently provided by the Corporate Nuclear Safety Section (CNSS) as outlined in the Technical Specifications, will not be altered by the change. Rather the proposed change will merely reflect a reporting realignment of the individuals and organizations currently providing the independent review function. Similarly, the audit of unit activity function currently provided by the Quality Assurance Auditing Unit of the Corporate Quality Assurance Department will not be altered by the change, but will reflect a reporting realignment of the individuals and organizations currently providing the audit function.

Consistent with current and previous record retention requirements, records of Nuclear Assessment Department reviews and Nuclear Assessment Department audits will be retained as life-time records of the plant.

In accordance with Specification 6.2.1a, lines of authority, responsibility, and communication will be documented and provided in the next annual update of the Final Safety Analysis Report (FSAR) as required by 10 CFR 50.71(e).

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change

Creation of the Nuclear Assessment Department (NAD) requires that the Technical Specifications be modified to reflect changes in the organizational structure. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because it is administrative in nature and does not physically alter any safety-related systems nor does it affect the way in which any safety-related systems perform their functions. The revisions to Section 6.0 of the Technical Specifications reflect changes in the organizational reporting structure of CP&L due to the creation of the Nuclear Assessment Department (NAD). The proposed change is administrative in nature in that the changes reflect organizational reporting changes rather than changes in the nature or depth of reviews and audits; recommendations for procedures, modifications, maintenance and operations activities; or other means of affecting unit safety. The independent review function currently provided by the Corporate Nuclear Safety Section (CNSS) as outlined in the Specifications, will not be altered by the change. Rather the proposed change will merely reflect a reporting realignment of the individuals and organizations currently providing the independent

review function. Similarly, the audit of unit activity function currently provided by the Quality Assurance Auditing Unit of the Corporate Quality Assurance Department will not be altered by the change, but will reflect a reporting realignment of the individuals and organizations currently providing the audit function. The other revisions to titles and organizations in the proposed change solely revise the Technical Specifications to reflect the revised organizational structure of the Company.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in Item 1, the proposed change is administrative in nature and does not physically alter any safety related systems, nor does it affect the way in which any safety related systems perform their functions. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed amendment does not involve a significant reduction in the margin of safety. The proposed change is administrative in nature and does not physically alter any safety related systems nor does it affect the way in which any safety related systems perform their functions. As a result of the change, the Brunswick Technical Specifications will better reflect the actual management structure at both the Brunswick Plant and the Corporate Office. Therefore, the proposed amendment does not involve a significant reduction in margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES
ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of air effluents that may be released offsite; and (3) result in an increase in an individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. This basis for this determination follows:

Proposed Change

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

Basis

This change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed change is purely administrative in nature and only revises Section 6 "Administrative Controls" of the Technical Specifications to reflect changes in the organizational reporting structure of CP&L due to the creation of the NAD. The proposed amendment does not introduce any new equipment nor does it require any existing equipment or systems to perform a different type of function than they are currently designed to perform. As such, the change cannot affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change is purely administrative in nature and only revises Section 6 "Administrative Controls" of the Technical Specifications to reflect changes in the organizational reporting structure of CP&L due to the creation of the NAD. No additional surveillances or testing results from the amendment. Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.