



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED AMENDMENT NO. 153 TO FACILITY OPERATING LICENSE NO. DPR-71
AND AMENDMENT NO. 183 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 February 11, 1991, as supplemented May 10, 1991, the Carolina Power & Light Company (the licensee) submitted a request for changes to the Brunswick Steam Electric Plant, Units 1 and 2 (BSEP), Technical Specifications (TS). The requested changes would:

- (1) a. Consolidate the Shift Operating Supervisor (SOS) and the Shift Supervisor positions as a single Senior Reactor Operator (SRO) entry in the BSEP TS table 6.2.2-1, Minimum Facility Shift Crew Composition, and replace TS references to the SOS with references to the Shift Supervisor.
- b. Increase the number of SROs in TS table 6.2.2-1 from one to two to reflect the consolidation of the SOS and Shift Supervisor positions.
- c. Add references for the new positions of the Operations Manager - Unit 1 and Operations Manager - Unit 2.
- (2) Add the requirement that the Manager-Operations hold, or have held, a SRO license for either BSEP or a similar unit.
- (3) Add a one-time, 18 month exception to the requirement for the Manager-Operations to hold, or have held, an SRO license for either the BSEP or a similar unit.

The May 10, 1991, letter renamed the Shift Foreman to the new title Shift Supervisor with functional responsibilities and reporting relationships remaining unchanged, provided clarifying information and a typographical correction that did not change the initial proposed no significant hazard consideration determination.

2.0 EVALUATION

The staff has evaluated the licensee's request for revision of the BSEP TS in accordance with the criteria set forth in the Standard Review Plan (SRP) Section 13.1.2-13.1.3, "Operating Organizations,". Additionally, Regulatory Guide 1.8, Revision 1-R, 1975, "Personnel Selection and Training," (RG 1.8, Rev. 1-R), and ANSI-N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel" (ANSI-N18.1-1971) were reviewed since they are the basis for the BSEP TS commitments.

The staff has reviewed proposed TS changes (1) which removes all reference to the Shift Operating Supervisor (SOS), increases the number of required SRO licensed individuals per shift from one to two in response to consolidation of the SOS position with the Shift Supervisor position, and incorporates references to the newly formed Operations Manager positions for Units 1 and 2, respectively.

The Code of Federal Regulations Title 10, (10 CFR) 50.54(m)(2)(i) discusses the minimum staffing requirements for on-site staffing of nuclear power units by operators and senior operators licensed under 10 CFR Part 55. For a two-unit facility with a shared common control room, the BSEP configuration, a minimum shift staffing level of two SRO licensed individuals is required. Part 50.54(l) requires that the licensee shall designate individuals holding SRO licenses with the responsibility of directing licensed activities of licensed operators. Proposed change (1) of the BSEP TS maintains the minimum required facility shift crew composition, as described in 50.54(m)(2)(i) and maintains the requirement that the activities of licensed operators shall be directed by SRO licensed individuals as described in 50.54(l), and is, therefore, acceptable.

The staff has reviewed the proposed TS change (2), which adds the requirement that the Manager-Operations hold or have held an SRO license for either the Brunswick Plant or a similar unit.

Regulatory Guide (RG) 1.8, Revision 1-R, endorses, with exception, the criteria for selection and training of nuclear power plant personnel contained in ANSI-N18.1-1971 the qualification for the functional levels of the operating organization including both managers and supervisors are described in detail in ANSI-N18.1-1971. According to ANSI-N18.1-1971, Operations Managers (the position of Manager-Operations at BSEP) shall hold an SRO license at the time of appointment to the position. Proposed change (2) to the BSEP TS requires that the Manager-Operations position maintain a technically sound background and knowledge of nuclear plant operations as exhibited by holding, or having held, an SRO license for either the BSEP or a similar unit. To satisfy the requirement that the operations management maintain in-depth, plant-specific knowledge, BSEP is incorporating additional levels of line supervision into the direct chain of command between the operating crew and the Manager-Operations. These positions, the Operations Managers for Units 1 and 2, require SRO licenses. As a result of implementing these additional levels of line supervision, BSEP has satisfied the requirements of 50.54(l), and the proposed requirements for the Manager-Operations are, therefore, acceptable.

The staff has reviewed proposed TS change (3), which adds a one-time, 18 month, exception to the requirement for the Manager-Operations to hold, or to have held, an SRO license for either BSEP or a similar unit, based on the following criteria.

- (1) The restructuring of the operations organization maintains the minimum shift complement of two SRO licensed individuals, within the chain of command for each unit. This is consistent with the requirements of Part 50.54(m)(2)(i).
- (2) The qualifications of the individual assigned to the position during the 18 month interval reflect the level of knowledge and experience described in ANSI-N18.1-1971 for such a managerial position.
- (3) The licensee agreed that if the current position incumbent leaves the position of Manager-Operations the NRC will be notified and be a party to reviewing the replacement if that person does not hold, or has not held, an SRO license for either the Brunswick Plant or a similar unit.

The staff has determined that the licensee's proposed changes to the BSEP TS meet the relevant requirements of 10 CFR 50.54 (1) and 10 CFR 50.54 (m)(2)(i), and RG 1.8, Rev. 1-R, and are, therefore, acceptable.

The licensee's submittal adequately described the qualifications and responsibilities for the affected positions; Manager-Operations, Operations Managers - Unit 1 and Unit 2, and Staff Supervisor, which reflect and preserve within the proposed organizational structure the requirements of ANSI-N18.1-1971, as endorsed by RG 1.8, Revision 1-R. The licensee has provided adequate justification with consideration to potential safety-significance for such changes.

In addition, the staff acknowledges the additional information provided with the May 10, 1991, letter concerning the licensing of Shift Technical Advisors and Operations Managers. Specifically, the Shift Technical Advisors do not necessarily hold an active senior reactor operator (SRO) license; rather, they either hold or have held an SRO license, but the license may or may not be currently active. The licensee has recently decided to discontinue the practice of Shift Technical Advisors holding a SRO license. These individuals will continue to receive training sufficient to receive an SRO license, but will not participate in the NRC license examination.

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 amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments relate to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding (56 FR 13659). Accordingly, the 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

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