



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

April 9, 1992

Docket Nos. 50-325
and 50-324

Mr. R. A. Watson
Executive Vice President
Power Supply
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

Dear Mr. Watson:

SUBJECT: FINAL SAFETY ANALYSIS REPORT UPDATE: FACT-FINDING VISIT
BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2, (TAC M81263)

In November 1991, the Commission directed the staff to (1) determine how licensees are responding to the requirement in 10 CFR 50.71 for annual updates to the Final Safety Analysis Report (FSAR), (2) ensure that the information included in the FSAR contains the latest material developed, and (3) determine whether and how the annual updates to the FSAR fall short of describing the licensees' current licensing basis (CLB). The staff is utilizing the definition of CLB from 10 CFR 54.3. Although set out in 10 CFR Part 54, that definition represents the staff's understanding of the scope of the CLB and should be applicable to all reactor licensees.

The staff will accomplish the Commission's directive by conducting fact-finding visits to a number of licensees that represent a good cross section of the industry. Our selection of plants includes those licensed from 1970 through 1987, all reactor vendor types, plants from all regions, and plants with known computerized systems for tracking commitments and those without such systems. We will visit each site and discuss the plant-specific programs for updating the FSAR by following the resolution of selected issues through the update process. We would also like to take advantage of our visit to your facility to observe whatever systems you employ to track commitments, search data for CLB type information, or record your FSAR for easy update, search, and/or retrieval.

We have chosen a number of issues which came about as the result of new regulations or staff interpretations of regulations so that the licensing basis for plants was expanded or further defined. Some or all of the issues also require facility modifications or new systems which may be described in the FSAR. For our fact-finding visit, we are not interested in the technical adequacy of the issue. Our objective is to understand your methodology and processes for updating the FSAR so that we will be able to advise the Commission on industry practices.

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For the Brunswick Steam Electric Plant, Units 1 and 2, we have chosen the following issues for discussion:

1. Improved Accident Monitoring (Regulatory Guide 1.97),
2. Reliability of Air Systems (Generic Letter 88-14),
3. RPV Level Instrumentation (NUREG-0737, Item II.F.2.4), and
4. 10 CFR 50.62, Anticipated Transient Without Scram (ATWS).

We will bring the initiating documents such as the Generic Letters with us, and it is requested that you have available for discussion your updated responses to the identified concerns, our acceptance letters and inspection reports that formed the CLB for the issues, and any other docketed correspondence such as your response to an Enforcement Action or Licensee Event Report that, through new commitments, modified the CLB for that issue. We can then follow the process from initiation through implementation and finally the latest FSAR update. In addition, it is requested that you identify one issue from your last FSAR update that included new licensing basis and/or plant modifications and be able to show how your latest update was accomplished. This should reveal how or if your update process has evolved over time.

The staff has committed to respond to the Commission with a report in the June 1992 time period. With your help, we believe we can meet this schedule with an accurate representation of the industry practice on FSAR updates and their relation to the CLB. We would like to meet with the members of your staff that will be responsible for your FSAR updates on May 6, 1992. Please let me know if this schedule is acceptable. We believe a half day should be appropriate to obtain the information we need on FSAR update; the remaining time can be spent on discussions and demonstration of your systems to track or retrieve the CLB type information.

The Commission in its November 1991 direction to the staff also established a pilot program for voluntary participation by licensees to compile their CLB. On March 19, 1992, NRC issued Generic Letter 92-03 on this subject, and we will be glad to answer questions on the Generic Letter. Our visit should not be construed as soliciting participation in the pilot program.

The objective of our request is to determine the facts about FSAR update and to obtain information on your current licensing basis tracking and documentation systems. There is no request for information and no new information is to be developed for our discussions. The information that we

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have requested be made available for the discussion should be readily accessible from your files. Therefore, no OMB clearance is deemed warranted. If you have questions about this or any other matter on our request, please let us know. I am available to answer questions or you may address generic questions to Dave Wigginton at (301) 504-1301.

Sincerely,

Original signed by

Ngoc B. Le, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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

Brunswick Steam Electric Plant
Units 1 and 2

cc:

Mr. Russell B. Starkey, Jr.
Vice President
Brunswick Nuclear Project
P. O. Box 10429
Southport, North Carolina 28461

Mr. H. A. Cole
Special Deputy Attorney General
State of North Carolina
P. O. Box 629
Raleigh, North Carolina 27602

Mr. H. Ray Starling
Manager - Legal Department
Carolina Power & Light Company
P. O. Box 1551
Raleigh, North Carolina 27602

Mr. Robert P. Gruber
Executive Director
Public Staff - NCUC
P. O. Box 29520
Raleigh, North Carolina 27626-0520

Mr. Kelly Holden, Chairman
Board of Commissioners
P. O. Box 249
Bolivia, North Carolina 28422

Resident Inspector
U. S. Nuclear Regulatory Commission
Star Route 1
P. O. Box 208
Southport, North Carolina 28461

Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Mr. Dayne H. Brown, Director
Division of Radiation Protection
N. C. Department of Environmental,
Commerce and Natural Resources
P. O. Box 27687
Raleigh, North Carolina 27611-7687

Mr. J. W. Spencer
Plant General Manager
Brunswick Steam Electric Plant
P. O. Box 10429
Southport, North Carolina 28461