



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 70 TO FACILITY LICENSE NO. DPR-71 AND
AMENDMENT NO. 98 TO FACILITY 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 letters dated July 28, 1981 and December 10, 1982 the Carolina Power & Light Company (CP&L/licensee) requested changes to its facility licenses and to the Technical Specifications regarding its management organization structure and reporting requirements. Section 6, Administrative Controls, of the Technical Specifications contain information and descriptions of the licensee's management organization. The licensee proposed to modify these specifications in the following manner to reflect current licensee organization and establish additional reporting requirements:

- (1) Inclusion of corporate and plant organization changes: The scope of activities of the Plant Nuclear Safety Committee (PNSC) as previously described in the Technical Specifications will continue to be performed. The proposed changes will provide for a more defined program of review and management overview of the facility operation.
- (2) The reporting requirements of Section 6.9.1.8 and 6.9.1.9 have been revised to include the guidance information contained in Regulatory Guide 1.16.
- (3) Inclusion of additional NRC (NUREG-0737) guidance concerning minimum shift crew composition.
- (4) Additional requirements for reporting safety/relief valve challenges.
- (5) Reformatting to be consistent with the format of the GE/BWR-4 Standard Technical Specifications.

The staff reviewed the requested changes and by letter dated April 21, 1983 the staff requested additional information. CP&L responded by letter dated December 29, 1983, updating the information in its previous requests and adding the following changes:

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1. Requirements per NUREG-0737 Item II.B.3 for establishing, implementing, and maintaining an administrative program concerning post-accident sampling. Technical Specifications for this item were requested by the NRC in Generic Letter No. 83-36 dated November 1, 1983.
2. Requirements per NUREG-0737 Item I.A.1.3 concerning the limitation of nuclear power plant staff overtime. Technical Specifications for this item were requested by the NRC in Generic Letter No. 83-02 dated January 10, 1983.
3. Administrative Controls requirements necessary to support the technical requirements of the Radiological Effluent Technical Specifications (RETS). These RETS Administrative Controls requirements were submitted in the CP&L letter dated November 11, 1983.
4. The inclusion of Operating License paragraphs 2.I and 2.J for Brunswick-1 and Operating License paragraphs 2.F and 2.G for Brunswick-2 in the Technical Specifications. Inclusion of these requirements in the Technical Specifications and deletion of the above referenced paragraphs from the Operating Licenses provides consistency with the GE/BWR-4 Standard Technical Specifications.

The staff issued its notice of the proposed license amendment in the Federal Register on October 26, 1983, prior to receiving CP&L's revised request of December 29, 1983. In that notice the staff proposed a determination of no significant hazards consideration. The additional changes subsequently proposed are consistent with that notice because they are either additional limitations not presently included in the Technical Specifications or are purely administrative. Therefore, the staff's previously proposed determination of no significant hazards consideration remains valid.

2.0 Evaluation

We have reviewed the licensee's proposed changes relating to revisions to the corporate organization, the plant organization, the Plant Nuclear Safety Committee, and numerous administrative and editorial changes. The significant changes are the following:

(1) Section 6.2.2

A statement has been added that "when either reactor is in Operational Condition 1,2 or 3, at least one licensed Senior Reactor Operator shall be in the control room."

Subsections d. and f. have been asterisked to note that, "The individual qualified to implement radiation protection procedures and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions."

A new subsection g. has been added that requires administrative procedures to limit the working hours of the facility staff who perform safety related functions, in accordance with guidelines, published by the Commission in Generic Letter 82-12

(2) Figure 6.2.1-1

The corporate organization has been revised under the Executive Vice President, Power Supply and Engineering and Construction. Reporting to this Executive Vice President are the Vice President Nuclear Safety and Research, Vice President Brunswick Nuclear Project (a new position), and the Manager Corporate Quality Assurance (a new position; the function formerly reported to the Vice President Nuclear Safety and Research). The Vice President Brunswick Nuclear Project is assigned to the site. Reporting to the Vice President Brunswick Nuclear Project is the General Manager Brunswick Plant (responsible for the facility staff), Manager Brunswick Nuclear Project Engineering and Construction, and the Director Planning and Scheduling. This new organization is shown in Figure 6.2.1-1.

(3) Figure 6.2.2-1

The facility organization has been revised under the General Manager Brunswick Plant. Reporting to the General Manager Brunswick Plant are the Manager Technical and Administrative Support, Manager Plant Operations, Director Regulatory Compliance, and an Assistant to General Manager. The Manager Technical and Administrative Support is responsible for plant technical and administrative support. The Manager Plant Operations is responsible for environmental and radiation control, plant maintenance, and plant operations. The Director Regulatory Compliance is responsible for plant compliance to NRC requirements, Corporate Nuclear Safety requirements and INPO guidelines. The Assistant to General Manager assists the General Manager Brunswick Plant in his duties. The revised facility organization is shown in Figure 6.2.2-1.

CP&L has restructured the Brunswick Steam Electric Plant's organization, to have the plant's Manager - Environmental and Radiation Control, (RPM) report to the Manager - Plant Operation (an assistant plant manager). Currently the plant's RPM reports to the Manager - Technical and Administrative. In addition the licensee has given the RPM direct communication lines with the Plant General Manager, the Corporate Health Physics and the Manager - Radiological and Chemical. Based on these communications lines the staff concludes that this part of the proposed plant organization meets the recommendations of NUREG-0731, "Criteria for Utility Management and Technical Competence and Regulatory Guide 8.8, Section C1.b(3) and is acceptable.

(4) Figure 6.2.2-2

The plant Fire Brigade organization has been revised to show the shift Fire Brigade reporting to the shift operating supervisor, and the fire protection support group and specialist reporting to the Principal Engineer Operations. This revised organization is shown in Figure 6.2.2-2.

(5) Table 6.2.2-1

The licensee has revised this table which specifies the minimum facility shift crew composition for various combinations of unit operating modes to conform to 10 CFR 50.54 in respect to licensed operators and to the July 31, 1980 interim shift criteria in respect to nonlicensed operators.

(6) Section 6.2.3

This is a new section that has been added. It provides for an On-site Nuclear Safety (ONS) unit that "shall function to examine facility operating characteristics, NRC issues, industry advisories, and other sources which may indicate areas for improving facility safety."

(7) Section 6.2.4

This is a new section that has been added. It provides a written description of the function of the Shift Technical Advisors.

(8) Section 6.5

This section has been extensively revised to allow for the review of many items by a designated reviewer(s) rather than by the Plant Nuclear Safety Committee (PNSC). The PNSC has been retained, but its responsibilities have been revised as described in Section 6.5.3.8. Additionally, the subsections have all been renumbered.

The responsibility for the Audit Program, Section 6.5.5 has been moved to the Performance Evaluation Unit of the Corporate Quality Assurance Department consistent with the revised corporate organization.

(9) Section 6.8.2

This section on temporary changes to procedures has been revised to include proposed tests and experiments. Additionally, CP&L has proposed that the time span allowed for approval of temporary changes to procedures, by the General Manager Brunswick Plant or his previously designated alternate, be extended from 14 days to 21 days. The staff considers 14 days to be adequate time for the approval or disapproval of a temporary change to procedures. Therefore, this change will not be granted and the approval time will remain 14 days.

(10) Consistent with the corporate and plant staff reorganization, title changes have been made throughout Sections 6.1 through 6.8.

We have reviewed the proposed changes to Sections 6.1 through 6.8 of the Brunswick Steam Electric Station, Units 1 and 2, and conclude they are acceptable as they meet our guidance described in Regulatory Guides 1.8 and 1.33, NUREG-0731, the interim criteria for shift staffing dated July 31, 1980, and the revised 10 CFR 50.54.

We have also reviewed the changes proposed for section 6.9; Reporting Requirements, 6.10; Record Retention, and 6.16; Environmental Qualification. The changes to sections 6.9, 6.10 and 6.12 were made to achieve consistency with NRC Standard Technical Specifications, to include notes from Regulatory Guide 1.16; Reporting of Operating Information, and to comply with the recommendations of NRC Generic Letters 83-02 and 83-36

regarding NUREG-0737 Technical Specifications. Section 6.16 was deleted in its entirety since the Environmental Qualification requirements have been superseded by the requirements of 10 CFR 50.49. We have found that these administrative changes are in conformance with the documents cited and are acceptable to the staff.

3.0 Environmental Considerations

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR 51.5(d)(4), that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

4.0 Conclusions

We have 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 and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: May 25, 1984