



Carolina Power & Light Company
PO Box 10429
Southport NC 28461

SEP 27 1995

SERIAL: BSEP 95-0501
10 CFR 50.54(q)

U. S. Nuclear Regulatory Commission
ATTN: 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
REVISION TO PLANT EMERGENCY PROCEDURES

Gentlemen:

In accordance with 10 CFR 50.54(q) and 10 CFR 50, Appendix E, Carolina Power & Light Company (CP&L) hereby submits revisions to Brunswick Steam Electric Plant, Units 1 and 2, Plant Emergency Procedures and Revision 42 of the Radiological Emergency Response Plan. CP&L has evaluated these changes in accordance with 10 CFR 50.54(q) and determined that the changes do not decrease the effectiveness of the Brunswick Plant Emergency Plan. A list of the revised procedures is provided in Enclosure 1. A summary of the changes is provided in Enclosure 2. Enclosure 3 contains copies of the revised Plant Emergency Procedures.

Please refer any questions regarding this letter to Ms. C. K. Cashwell at (910) 457-2673.

Sincerely,



G. D. Hicks

Manager - Regulatory Affairs
Brunswick Nuclear Plant

CKC/kah

Enclosures

cc: Mr. S. D. Ebnetter, Regional Administrator, Region II (2 copies)
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector
Mr. D. C. Trimble, Jr., NRR Senior Project Manager - Brunswick Units 1 and 2
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

020017
9510030256 950927
PDR ADOCK 05000324
F PDR

A045
11

ENCLOSURE 1
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50.325 & 50-324
LICENSE NOS. DPR-71 & DPR-62

REVISION TO PLANT EMERGENCY PROCEDURES

LISTING OF REVISED PLANT EMERGENCY PROCEDURES

<u>PROCEDURE</u>	<u>REVISION</u>	<u>TITLE</u>
OERP	42	Radiological Emergency Response Plan
PEP-Appendix A	52C	Emergency Response Resources
PEP-01.0	16	Plant Emergency Procedures Introduction
PEP-02.6.6	9	Environmental Monitoring Team Leader
PEP-02.6.12	18	Activation and Operation of the Operational Support Center
PEP-02.6.20	14	Dose Projection Coordinator
PEP-02.6.21	30C	Emergency Communicator
OPEP-02.6.26	2	Activation and Operation of the Technical Support Center (TSC)
PEP-02.6.27	2	Activation and Operation of the Emergency Operations Facility (EOF)
PEP-03.5.5	0	Environmental Monitoring and Plume Tracking
PEP-03.6.1	9C	Release Estimates Based Upon Stack/Vent Readings
PEP-03.6.3	7	Estimate of the Extent of Core Damage Under Accident Conditions
PEP-03.6.5	3	Collection and Analysis of Highly Radioactive Samples
PEP-03.7.6	0	Emergency Exposure Controls
PEP-03.7.7	0	Onsite Radiological Controls
PEP-04.2	10	Emergency Facilities and Equipment
PEP-04.6	15	Radiological Emergency Kit Inventories
PEP-04.8	1	Periodic Review of Emergency Plan
PEP-03.3.1	Cancelled	In-Plant Monitoring and Surveys

<u>PROCEDURE</u>	<u>REVISION</u>	<u>TITLE</u>
PEP-03.3.5	Cancelled	Emergency Radiation Work Permits
PEP-03.5.1	Cancelled	Confirmation of Offsite Dose Projections
PEP-03.5.2	Cancelled	Expanded Environmental Monitoring
PEP-03.5.3	Cancelled	Plume Tracking by Actual Measurement
PEP-03.7.2	Cancelled	Emergency Personnel Monitoring and Dosimetry
PEP-03.7.3	Cancelled	Issuance and Use of Protective Gear
PEP-03.7.4	Cancelled	Monitoring and Surveys for Personnel Habitability
PEP-03.7.5	Cancelled	Monitoring and Decontamination of Vehicles Outside the Protected Area
PEP-03.8.3	Cancelled	Administration of Radioprotective Drugs
PEP-03.8.4	Cancelled	Access Control

ENCLOSURE 2
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50.325 & 50-324
LICENSE NOS. DPR-71 & DPR-62

Revision Summary

A. Radiological Emergency Response Plan

The changes included in Revision 42 of the Radiological Emergency Response Plan can be grouped in four general categories:

- Plant Emergency Procedure upgrade effort
- Organizational Changes as a result of plant reorganization
- Operational Concept Changes in the Emergency Response Organization
- Clerical, Editorial, and Grammatical Corrections

Following is a breakdown of the items identified in the Revision Summary by these four groups.

Plant Emergency Procedure upgrade

19a, 19b, 21a, 25a, 25b, 26a

Organizational Changes

3a, 4a, 5a, 6a, 7a, 7b, 8a, 9a, 10a, 12b, 13a, 14a, 15a, 16a, 22a, 23a, 24a,

Operational Concept

11a

Clerical, Editorial, and Grammatical Corrections

1a, 1b, 2a, 12a, 17a, 18a, 20a,

E-Plan Changes

1. Step 1.3.1.2
 - a. Paragraph 2, second sentence - changed sentence to reflect that emergency response duties are position related rather than individual related by changing "individual" to "position".
 - b. Paragraph 3, first sentence - changed "at the discretion of management" to "at the discretion of the Site Emergency Coordinator" for activation of the Emergency Operations Facility.
2. Step 2.2 - Unusual Event
 - a. Paragraph 4, last sentence - corrected the title of OPEP-02.2 by adding "Notification of".
3. Figure 2.0-1
 - a. Changed "Shift Supervisor" to "Shift Superintendent".
4. Section 3.0
 - a. Paragraph 5, first sentence - changed "Shift Supervisor" to "Shift Superintendent".
5. Step 3.1
 - a. Paragraph 4, first sentence - changed the sentence to reflect the new operations organization structure of a Shift Superintendent, two Senior Control Operators, four Control Operators, seven Auxiliary Operators, three Health Physics Technicians, one Chemistry Technician, and a Work Control Center SRO and STA.
6. Section 3.2
 - a. Paragraph 4, last sentence - changed "Shift Supervisor" to "Shift Superintendent".
7. Step 3.2.1
 - a. Paragraph 1, first sentence - changed "Shift Supervisor" to "Shift Superintendent".
 - b. Paragraph 1, third sentence - changed sentence to reflect the transfer of SEC responsibilities within the Control Room organizational structure based on the new position titles.
8. Step 3.2.2
 - a. Paragraph 1 - changed "Shift Supervisor" to "Shift Superintendent".
9. Step 3.3.1
 - a. Paragraph 1, first sentence - changed "Shift Supervisor" to "Shift Superintendent".

10. Figure 3.1-1
 - a. Replaced with the new Operations shift organizational structure.
11. Figure 3.4-1
 - a. Deleted the position of "Storekeeper" from the OSC organizational structure.
12. Step 4.1.1
 - a. Paragraph 1, last sentence - corrected the title of OPEP-02.1 by adding "Emergency".
 - b. Paragraph 2, first sentence - changed "Shift Supervisor" to "Shift Superintendent".
13. Step 4.1.2
 - a. First sentence - changed "Shift Supervisor" to "Shift Superintendent".
14. Step 4.1.3
 - a. Paragraph 2, first and second sentences - changed "Shift Supervisor" to "Shift Superintendent".
15. Step 4.1.4
 - a. Paragraph 2, first sentence - changed "Shift Supervisor" to "Shift Superintendent".
16. Step 4.1.5
 - a. Paragraph 2, first sentence - changed "Shift Supervisor" to "Shift Superintendent".
17. Step 4.2.4
 - a. Paragraph 3, fourth sentence - reworded the sentence to clarify the CP&L to offsite agency relationship involving environmental monitoring activities.
18. Step 4.4.2.1
 - a. Paragraph 1, first sentence - corrected the title of OPEP-02.2 by adding "Notification of".
19. Step 4.4.3
 - a. Paragraph 1, first sentence - changed "OPEP-03.3.5, Emergency Radiation Work Permits" to "OPEP-03.7.7, Onsite Radiological Controls".
 - b. Paragraph 3, first sentence - changed "OPEP-03.8.3, Administration of Radioprotective Drugs" to "OPEP-03.7.6, Emergency Exposure Controls".

20. Step 4.4.3.2

- a. Paragraph 1, first sentence - deleted the word "pocket".

21. Step 5.7.7

- a. Paragraph 1, second sentence - changed "BNP PEPs 3.5.1, 3.5.2, and 3.5.3." to "BNP OPEP-02.6.6, Environmental Monitoring Team Leader and OPEP-03.5.5, Environmental Monitoring and Plume Tracking."

22. Step 6.1.3

- a. Paragraph 1, first sentence - changed "Manager - Emergency Preparedness" to "Supervisor - Emergency Preparedness".

23. Step 6.2.1

- a. Paragraph 1, first sentence - changed "Manager - Emergency Preparedness" to "Supervisor - Emergency Preparedness".

24. Step 6.2.2

- a. Paragraph 1, first sentence - changed "Nuclear Assessment Department" to "Nuclear Assessment Section".

25. Appendix G

- a. Deleted all references to:

- OPEP-03.3.3 Emergency Radiation Work Permits
- OPEP-03.7.4 Monitoring and Surveys for Personnel Habitability
- OPEP-03.8.3 Administration of Radioprotective Drugs
- OPEP-03.5.1 Confirmation of Initial Dose Projections
- OPEP-03.5.2 Expanded Environmental Monitoring
- OPEP-03.5.3 Plume Tracking by Actual Measurement

- b. Added references to:

- OPEP-03.5.5 Environmental Monitoring and Plume Tracking
- OPEP-03.7.6 Emergency Exposure Controls
- OPEP-03.7.7 Onsite Radiological Controls

26. Appendix H

- a. Changed reference OPEP-03.5.1 to OPEP-03.5.5

B. PEP-01.0

1. Complete rewrite and format change.

2. General Changes

- References to "Brunswick Steam Electric Plant" and "BSEP" were changed to "Brunswick Nuclear Plant" and "BNP".
- References to "Sections" were changed to indicate "OPEPs".
- Deleted all references to "Exhibits" including information on their use.
- Deleted all reference to checklist style procedures.
- Moved Emergency Repair Director position to the OSC.
- Deleted the title of Logistics Support Director and split the responsibilities between the Communications Director and Security Director.
- Added position of "Security Director" in the TSC.
- Changed position title "Emergency Communicator" to "Communications Director" in the TSC and "Communications Manager" in the EOF.
- Deleted reference to "teams".
- Deleted old Exhibit 1.1-1.
- Revised the Emergency Response Organization chart.
- Revised the "Table of Contents" (Attachment 2) to reflect the current Plant Emergency Procedures (PEPs).
- Clerical and editorial changes were made throughout the procedure to minimize ambiguity, clarify intent, and correct clerical errors.

C. PEP-02.6.6

1. Complete rewrite and format change.

2. The procedure rewrite reflects:

- The consolidation of OPEP-03.5.1, OPEP-03.5.2, and OPEP-03.5.3 into new procedure OPEP-03.5.5; and,
- Incorporation of OPEP-03.3.5 and OPEP-03.8.3 into new procedures OPEP-03.7.6 and OPEP-03.7.7.

3. General Changes

- Environmental Monitoring Team Leader responsibilities were expanded for clarification.
- All figures in Attachment 2 were redrawn for legibility.
- The Communications Log Sheet (old attachment 3) and Emergency Action Level Recommendation Guidelines (old attachment 4) have been deleted.
- Guidelines for determining dosimeter correction factors have been added as Attachment 3 and an associated calculation sheet as Attachment 4.

D. PEP-02.6.12

1. General Changes

- Removed the Storekeeper position and the associated mission.
- Added references to new Procedures OPEP-03.7.6 and OPEP-03.7.7 and deleted

references to canceled procedures OPEP-03.3.1, OPEP-03.3.5, OPEP-03.7.5, and OPEP-03.8.4.

- Clarified E&RC Coordinator responsibilities as associated with the new procedures.
- Clarified the Access Control Logkeeper responsibilities.
- Clarified the responsibility of the ERD to notify the TSC of missions already in the field prior to TSC activation and also when the OSC may be activated.
- Implemented a single RWP process for emergency events.
- Clarified "walking clearance".
- Clarified the responsibilities of the HP Lead including reference to new procedures.
- Deleted note in Section 5.0 referencing checklist guidance.
- Added steps to ensure all missions are coordinated via the primary OSC positions (E&RC, Operations, and OSC Mission Coordinator) independent of the mission's primary focus
- Added notes to provide direction for use of the Mission Authorization Forms.
- Changed references to "Manager - Emergency Preparedness" to "Supervisor - Emergency Preparedness".
- Added step to provide direction for the Access Control Logkeeper concerning retention of a copy of the OSC Mission Authorization Form.
- Changed previous Attachment 3 to Form OPEP-02.6.12-1 (7/95) and renumbered all subsequent attachments.

2. Page 5

- Step 4.1.5 changed "Ensure..." to "Report..." and deleted "...is reported...".

3. Page 6

- Reworded Steps 4.3.1, 4.3.3, 4.3.4, 4.3.6, 4.3.8, 4.3.9, 4.5.1, 4.5.2, and 4.5.3.

4. Page 7

- Reworded Steps 4.5.4, 4.5.5, 4.5.6, 4.6.2, 4.6.3, 4.6.4, and 4.6.5.
- Added Step 4.7.4.

5. Page 8

- Reworded Steps 4.8.4, 4.9.1, 4.9.2, and 4.9.3.
- Deleted Step 4.10 and renumbered the subsequent steps.

6. Page 10

- Section 5.1 inserted Note prior to Step 5.1.1.
- Reworded Steps 5.1.3, 5.1.8, and 5.1.11.

7. Page 11

- Reworded steps 5.1.12, 5.1.13, 5.1.15, and 5.1.19.

- Added new Step 5.1.14 and renumbered the subsequent steps.
 - Added Note between 5.1.15 and 5.1.15a.
8. Page 12
- Revised Step 5.1.25 to indicate Attachment 4
9. Page 13
- Changed Step 5.2.4 to add "...and stores area key...".
 - Step 5.2.4.1 added.
 - Step 5.2.5.b revised.
 - Changed Step 5.2.7 to replace "...discuss..." to "...evaluate...".
 - Added Note and Step 5.2.10.1 following Step 5.2.10.
10. Page 14
- Deleted step 5.2.12.c.
11. Page 15
- Added Step 5.2.19.e.
12. Page 16
- Steps 5.3.3.c, 5.3.5.b, 5.3.7, and 5.3.8 reworded.
 - Note following 5.3.5.c added.
13. Page 17
- Step 5.3.10 reworded.
 - Added new steps 5.3.13 and 5.3.14 and renumbered subsequent step.
14. Page 18
- Steps 5.4.6, 5.4.7, 5.4.10, 5.4.12, and 5.4.14 reworded.
 - Step 5.4.8 deleted and subsequent steps renumbered.
15. Page 21
- Note added following Step 5.6.5.

16. Page 22
 - Note added following Step 5.6.15.
17. Page 23
 - Step 5.7.4.1 added.
18. Page 24
 - Deleted Step 5.8
19. Attachment 1
 - Page 2 of 2 revised for legibility.
20. Attachment 3
 - Page 2 of 3, title revised to delete "Additional Information".

E. PEP-02.6.20

1. Complete Format Change.
2. General Changes
 - The Dose Projection Team Leader and Plant Sampling and Analysis Team Leader titles were changed to Dose Projection Coordinator and Chemistry Lead respectively.
 - References to PEP-03.5.1 were changed to reflect cancellation of the procedure and incorporation of new procedure PEP-03.5.5.
3. Section 2.0
 - OPEP-02.5 was deleted from the references and OPEP-02.6.28, "Offsite Protective Action Recommendations" was added.
4. Step 5.1.1 reworded to delete reference to the Radiological Controls Director.
5. Notes following Step 5.2.7
 - Reworded notes to clarify intent of Attachment 6 for placement of Environmental Monitoring Teams and to remove statement concerning consideration of a 360° protective action recommendation.
6. Step 5.2.13 step was added.
7. Step 5.2.14 was reworded to change "Chemistry Lead" to "Accident Assessment Team".

8. Attachment 5
 - Deleted the "Affected Zones" information.

9. Attachment 8
 - Deleted PAR information

F. OPEP-02.6.21

1. Exhibit 02.6.21-2
 - Changed the home telephone number for the Vice President - Brunswick Nuclear Plant
 - Changed the number for INPO to an 800 number.
2. Exhibit 02.6.21-3
 - Changed the number for INPO to an 800 number.

G. OPEP-02.6.26

1. Format Change
 - Revised format to delete checklist style switched position of steps 5.1.4 and 5.1.5.
2. General Changes
 - References to Plant Emergency Procedures; OPEP-03.5.1, OPEP-03.5.2, OPEP-03.5.3, OPEP-03.7.4, OPEP-03.8.3, and OPEP-03.8.4 have been deleted and new procedures OPEP-03.5.5, OPEP-03.7.6, and OPEP-03.7.7 and have been added as a result of procedure changes made in the Plant Emergency Procedure upgrade effort. E&RC-0250, "Posting of Areas/Materials" references have also been deleted as part of this effort.
 - Deleted TSC Habitability Technician responsibilities and guidance and renumbered subsequent steps.
 - Changed position title of the Control Room Shift Supervisor to Shift Superintendent.
 - Change position title of Manager - Emergency Preparedness to Supervisor - Emergency Preparedness.
 - Revised all graphics for legibility.
 - Changed "BSEP Emergency Response Plan" to "BNP Radiological Emergency Response Plan".

- Changed references to "Fire Brigade" to "Loss Prevention Unit".
 - Deleted responsibilities to "Setup the TSC..." and renumbered subsequent steps.
3. Page 6
- Clerical, grammatical, or editorial changes to steps 3.0, 3.1, 3.3, and 4.1.1.
4. Page 7
- Clerical, grammatical, or editorial changes to Steps 4.1.9 and 4.3.5.
 - Added Step 4.2.5.
5. Page 8
- Clerical, grammatical, or editorial changes to Steps 4.4.1, 4.4.2, 4.4.4, and 4.6.
 - Added Step 4.3.7.
 - Step 4.4.5 - Changed the Radiological Controls Director responsibility for KI from "approval for administration to on-site personnel" to "recommendation as conditions dictate"
6. Page 9
- Clerical, grammatical, or editorial changes to Steps 4.10.1 and 4.11.1.
7. Page 10
- Changed title of Section 5.0 from "Procedure" to "Instructions".
 - Deleted the note following the table referencing the checklist style format.
8. Page 11
- Step 5.1.5 - revised the SEC turnover process to conform with the ERM and Control Room SEC procedures.
9. Page 13
- Clerical/editorial change to Steps 5.1.6, 5.1.8, and 5.1.10.
 - Step 5.1.9 - corrected reference to the TSC emergency ventilation system to change "recirculation mode" to "emergency filtration alignment".
10. Page 14
- Clerical, grammatical, or editorial changes to Steps 5.1.13, 5.1.14, Note following 5.1.14, 5.1.15.2, 5.1.16, and 5.1.16.1.

- Step 5.1.11.1 - Expanded SEC emergency classification responsibilities to include; coordination of classification changes with the ERM and ERD, and notification of all on-site personnel.
11. Page 15
- Clerical, grammatical, or editorial changes to Steps 5.1.17 and 5.1.19.
 - Step 5.1.16.2 - added.
 - Old Step 5.1.20 to evaluate habitability results deleted.
 - Step 5.1.24.1 - Added the NRC to the concurrence process for deactivation of the TSC.
12. Page 16
- Clerical, grammatical, or editorial changes to Steps 5.2.6 and 5.2.7.
13. Page 17
- Clerical, grammatical, or editorial changes to Steps 5.2.11, 5.2.13, 5.2.21, and 5.2.22.
14. Page 18
- Clerical, grammatical, or editorial changes to Steps 5.2.23, 5.2.24, 5.2.27, 5.2.29, and 5.2.30.
15. Page 19
- Clerical, grammatical, or editorial changes to Steps 5.3.5, 5.3.9, and 5.3.11.
16. Page 20
- Clerical, grammatical, or editorial changes to Steps 5.3.12, 5.3.13, and 5.3.15.
 - Step 5.3.16 - deleted step for use of cameras from TAD section and replaced with step for TAD to establish contact and provide periodic TSC briefings for the TAM.
17. Page 21
- Clerical, grammatical, or editorial changes to Steps 5.4.7, 5.4.8, and 5.4.10.
 - Deleted reference to walking RWPs from RCD section and renumbered subsequent steps.
18. Page 22
- Clerical, grammatical, or editorial changes to Steps 5.4.18, 5.4.23, 5.4.26, and 5.4.28.

19. Page 23
- Clerical, grammatical, or editorial changes to Steps 5.4.29, 5.4.32, 5.4.33, 5.4.36 and 5.4.38.
 - Step 5.4.30 - corrected location for setup of the NRC mobile lab.
20. Page 24
- Clerical, grammatical, or editorial changes to Steps 5.5.5, 5.5.6, and 5.5.7.2.
 - Step 5.5.8 - corrected procedure for activating the TSC/OSC intercom in the Communications Director section.
21. Page 25
- Clerical change to Step 5.5.11.
 - Deleted step for Communications Director to obtain TSC/EOF diesel generator status.
22. Page 26
- Clerical change to Step 5.5.19.
 - Step 5.5.20.2 - added step to deactivate the TSC intercom system to the Communications Director section.
23. Page 28
- Clerical change to Step 5.7.6.
24. Page 29
- Clerical, grammatical, or editorial changes to Steps 5.7.10, 5.7.13, and 5.7.14.
25. Page 30
- Deleted the step for the TSC Security Officer to sign in on the TSC Organization Board.
 - Deleted step to maintain access control.
 - Clerical, grammatical, or editorial changes to Steps to 5.8.3, 5.9.1, and 5.9.3.
26. Page 31
- Step 5.9.6 - added to establish communications with the Accident Assessment Team Member Liaison.
 - Deleted Step addressing AAT member check in at OSC prior to entering plant.

- Step 5.9.11 - Revised to delete reference to camera usage and add to evaluate and provide plant damage assessments to the TAD.
- Clerical change to Step 5.9.14.

27. Page 36

- Added note concerning Admin and Clerical Staff.
- Clerical, grammatical, or editorial changes to Steps to 5.13.3, 5.13.4, 5.13.5, 5.13.7, 5.13.9, and 5.13.10.

28. Attachment 11

- Added Attachment 11, Event Classification Message Display, and step for the Communications Director to maintain.

H. OPEP-02.6.27

The changes to OPEP-02.6.27 may be grouped in the following five general categories for discussion.

- Clerical and Editorial Changes
 - 1a, 2a, 3a, 3c, 4a, 4b, 9a, 9c, 9d, 9f, 9g, 9i, 9j, 9k, 9m, 9o, 10b, 10c, 10d, 10e, 10f, 10g, 10h, 10i, 10j, 10k, 10l, 11b, 11c, 11d, 11f, 11h, 11i, 12b, 12c, 12d, 12f, 12e, 12j, 12l, 12n, 12o, 12p, 12r, 12s, 12t, 15a, 15b, 15c, 15d, 15e, 15f, 15g, 16a, 16b, 16c, 16d, 17a, 18a, 18c, 18e, 19a, 19b, 19c, 20a, 21a, 21e, 22a, 23a, 25a, 26a
- Plant Emergency Procedure (PEP) Upgrade Changes
 - 1b, 1c, 6, 8a, 8b, 12h, 12i, 12k, 12q, 13, 21c,
- Clarification of Responsibilities
 - 3b, 4c, 5a, 7a, 9h, 9l, 9m, 9n, 10a, 11a, 11e, 11g, 12a, 12g, 14a, 14b, 14c, 15h, 17b, 18f, 21b, 21d,
- Title/Position Changes
 - 9b, 9p, 24b
- Miscellaneous
 - 8c, 9e, 12m, 18d, 24a, 27a
- 1. Section 2.0 - References
 - a. Changed "BSEP" to "BNP".

- b. Revised to reflect the cancellation of Plant Emergency Procedures; OPEP-03.5.1, OPEP-03.5.2, OPEP-03.5.3, OPEP-03.7.4, OPEP-03.8.3, OPEP-03.8.4, and OPEP-03.7.5 and incorporate new procedures OPEP-03.5.5, OPEP-03.7.6, and OPEP-03.7.7.
 - c. Deleted reference to E&RC-0250, "Posting of Areas/Materials"
- 2. Section 3.0 - General Information
 - a. Step 3.1 - changed "...Training Building..." to "...EOF/TSC/Training Building..."
- 3. Section 4.1 - Emergency Response Manager
 - a. Note preceding step 4.1.1 - revised sentence to read as an "or" rather than an "and" statement.
 - b. Step 4.1.1 - changed "...overall command and control..." to "...overall site command and control..."
 - c. Step 4.1.4 - added the word "the" in two locations.
- 4. Section 4.5 - Dose Projection Coordinator
 - a. Step 4.5.1 - added the word "the".
 - b. Step 4.5.2 - added the word "the".
 - c. Step 4.5.4 - Added the step, "Coordinate efforts with the Environmental Monitoring Team Leader for environmental monitoring information.
- 5. Section 4.6 - Environmental Monitoring Team Leader
 - a. Reworded steps 4.6.1, 4.6.2, and 4.6.3 for clarity.
- 6. Deleted old Section 4.7 - EOF Habitability Technician and renumbered subsequent sections.
- 7. Section 4.15 - EOF Security Officer
 - a. Added "...at the west entrance double doors."
- 8. Section 5.0 - Procedure
 - a. Deleted EOF Habitability Technician from the position table.
 - b. Deleted the "Note" following the ERO position table.
 - c. Deleted the checklist style format.

9. Section 5.1 - Emergency Response Manager (ERM)
- a. Switched the order of old steps 5.1.4 and 5.1.5 and renumbered.
 - b. Step 5.1.4 (Note) - Changed title of Control Room Supervisor to Control Room Superintendent and added the word "the".
 - c. Step 5.1.5 - added "(See Attachment 6)"
 - d. Step 5.1.5.a - deleted
 - "...which have been implemented" from status of execution of steps in emergency procedures
 - "...or operations taking place" and replaced with "in progress"
 - "Operations which have been directed or planned, but not yet carried out"
 - e. Step 5.1.5.b - deleted "Site Exclusion Area"
 - f. Step 5.1.5.c - deleted the word "any".
 - g. Step 5.1.9 - changed the wording from "...more often if conditions change significantly..." to "significant changes" and "Facility Briefing Work Sheet" to "Facility Turnover/Briefing Work Sheet".
 - h. Deleted old step 5.1.12, "Approve access of personnel to EOF, as necessary." and renumbered subsequent steps.
 - i. Step 5.1.12 (new) - reworded to read "Provide emergency classification recommendations to the SEC."
 - j. Step 5.1.12.a - deleted "...with SEC..." and added the word "the".
 - k. Step 5.1.12.b - changed "...emergency with State, Counties,..." to "...emergency classification with State, Counties,..."
 - l. Note preceding Step 5.1.13 - changed to break into two sentences with second reading "Status updates shall be provided at least within 60 minutes of the previous update, or sooner if conditions change."
 - m. Step 5.1.13 - changed "...for follow-up notifications to State/Counties." to "...for initial and follow-up notifications to the State/Counties."
 - n. Deleted old Step 5.1.16 - "Evaluate result of habitability with Radiological Control Manager and initiate protective measures, as necessary." and renumbered subsequent steps.
 - o. Step 5.1.18 - added "...in accordance with OPEP-02.6.28, 'Off-Site Protective Action Recommendations'."
 - p. Step 5.1.29 - changed "Manager-Emergency Preparedness" to "Supervisor-Emergency Preparedness"

10. Section 5.2 - Assistant Emergency Response Manager

- a. Deleted old Step 5.2.3, "Prepare or set up EOF, if necessary, as illustrated in Attachments 2 through 5, "EOF Layout." and renumbered subsequent steps.
- b. Step 5.2.3 - changed "Determine" to "Verify".
- c. Step 5.2.4 - Added the word "the" and changed to read "...have been established with:
- d. Step 5.2.6 - Added the word "the".
- e. Step 5.2.7 - Deleted the words "...as appropriate."
- f. Step 5.2.8 - Changed sentence from "Monitor EOF personnel to ensure compliance with procedures." to "Monitor procedure compliance by EOF personnel."
- g. Step 5.2.10 - Changed "Provide assistance to ERM..." to "Assist the ERM in conduct..." and "Facility Briefing Work Sheet" to "Facility Turnover/Briefing Work Sheet".
- h. Step 5.2.12 - Changed "...State/County..." to "State and County..."
- i. Step 5.2.14.a - added the word "the".
- j. Step 5.2.15 - added the word "the".
- k. Step 5.2.16 - changed "mitigative" to "mitigating".
- l. Step 5.2.19 - changed "...BSEP Emergency Response Plan..." to "...BNP Radiological Emergency Response Plan..."

11. Section 5.3 - Technical Analysis Manager

- a. Deleted old step 5.3.3, "Prepare or set up EOF, if necessary, as illustrated in Attachments 2 through 5, 'EOF Layout'."
- b. Step 5.3.3 - Changed "Determine" to "Verify".
- c. Step 5.3.4 - changed "Notify TSC Technical Assessment Director of presence in EOF" to "Establish communications with the Technical Assessment Director."
- d. Step 5.3.8 - changed "...updates..." to "...briefings...", "...from TSC..." to "...via the...", and added "...during the TSC periodic briefings."
- e. Deleted old Step 5.3.11, "Perform plant systems operational analysis and trending." and renumbered the subsequent steps.
- f. Step 5.3.11 - changed "...TSC..." to "...the..."
- g. Step 5.3.13 - changed "...TSC Technical Assessment Director and..." to "...the..."

- h. Step 5.3.17.c - added the word "the".
 - i. Step 5.3.18 - added the word "the".
12. Section 5.4 - Radiological Control Manager
- a. Deleted old step 5.4.3, "Prepare, or set up EOF, if necessary, as illustrated in Attachments 2 through 5, 'EOF Layout'." and renumbered the subsequent steps.
 - b. Step 5.4.3 - Changed "Determine" to "Verify".
 - c. Step 5.4.4 - changed "Notify TSC Radiological Director of presence in EOF" to "Establish communications with the Radiological Control Director."
 - d. Step 5.4.8 - deleted the word "TSC".
 - e. Step 5.4.11 - changed "...TSC..." to "...the...".
 - f. Step 5.4.13 - added the word "the".
 - g. Step 5.4.17 - added the word "the" and changed to read "...system with the EOF Habitability Technician and Administrative..."
 - h. Deleted old steps 5.4.19, 5.4.20, 5.4.21, 5.4.22, and 5.4.23, replaced with step 5.4.18, "Initiate and maintain habitability monitoring in the EOF in accordance with OPEP-03.7.7, On-Site Radiological Controls." and renumbered the subsequent steps.
 - i. Step 5.4.23 - reworded sentence for clarification and replaced reference to OPEP-03.7.5 with OPEP-03.7.7.
 - j. Step 5.4.24 - added the word "the".
 - k. Step 5.4.25 - changed "...issuance..." to "...distribution..." and OPEP-03.8.3 to OPEP-03.7.6.
 - l. Step 5.4.26 - changed from "Provide recommendations on issuance of KI to Emergency Response Manager (ERM)." to "provide the Emergency Response Manager (ERM) with KI distribution recommendations."
 - m. Deleted the Note preceding step 5.4.27.
 - n. Step 5.4.28 - added the word "the".
 - o. Step 5.4.30 - added the word "the".
 - p. Step 5.4.31 - added the word "the".
 - q. Step 5.4.35 - changed "Discuss..." to "Provide...", "...with..." to "...to the..." and "...EOF personnel..." to "...Communications Manager..."

- r. Step 5.4.36 - reworded step to clarify.
 - s. Step 5.4.38 - added the word "the".
 - t. Step 5.4.43 - changed "...any..." to "...all...".
13. Deleted old Section 5.5 - EOF Technician Habitability and renumbered the subsequent sections.
14. Section 5.5 - EOF Senior Reactor Operator (SRO)
- a. Deleted old step 5.6.3, "Prepare, or set up EOF, if necessary, as illustrated in Attachments 2 through 5, 'EOF Layout'." and renumbered the subsequent steps.
 - b. Deleted old step 5.6.10, "Assess extent of core damage".
 - c. Deleted old step 5.6.11, "Review source term assessments per OPEP-03.6.1, 'Release Estimates Based Upon Stack/Vent Readings'." and renumbered the subsequent steps.
15. Section 5.6 - Administrative and Logistics Manager
- a. Step 5.6.4 - revised step to read "Direct EOF personnel to:
 - Test communications equipment
 - Maintain a log of activities
 - Record name/date/time on all records(trending charts, status sheets, checklists, etc.)
 - b. Step 5.6.8.a - added the word "the".
 - c. Step 5.6.15 - deleted "...as necessary."
 - d. Step 5.6.16 - added the word "the".
 - e. Step 5.6.24 - added the word "with".
 - f. Step 5.6.26 - added the word "the".
 - g. Step 5.6.28 - deleted "...as necessary."
 - h. Added Step 5.6.32, "Maintain the Event Classification Message Board"
16. Section 5.7 - EOF Phone Talker(s)
- a. Step 5.7.4 - changed "Determine..." to "Verify..." and deleted "...follow-up...".
 - b. Step 5.7.7 - replaced "Perform follow-up..." with "Make..."
 - c. Step 5.7.8 - changed "...that..." to "...on completion of all..." and "...have been notified." to "...notifications."

- d. Step 5.7.13.d - changed "...any..." to "...all...".
17. Section 5.8 - EOF Status Board Plotter
- a. Step 5.8.5.a - deleted "...as appropriate,..."
 - b. Added new step 5.8.9, "Monitor the plant Public Address (PA) System to relay significant events to EOF staff." and renumbered subsequent steps.
18. Section 5.9 - Public Information Communicator
- a. Step 5.9.4 - changed "Determine..." to "Verify...".
 - b. Step 5.9.11 - deleted "...on computer..."
 - c. Step 5.9.12 - changed "Print out..." to "Provide..."
 - d. Step 5.9.14 - added the word "the" and deleted "...via computer"
 - e. Deleted the Note following Step 5.9.14.
 - f. Deleted old Step 5.9.15 and renumbered subsequent steps.
19. Section 5.10 - ERFIS Operator
- a. Step 5.10.4 - changed "Determine..." to "Verify..." and deleted "...as applicable".
 - b. Step 5.10.9 - deleted "...to Administrative and Clerical Staff...", changed "...if display system is not..." to "...if video display system is not...".
 - c. Step 5.10.12 - deleted "...as appropriate".
20. Section 5.11 - EOF Administrative and Clerical Staff
- a. Step 5.11.4 - changed "Determine..." to "Verify..." and deleted "...as applicable".
21. Section 5.12 - EOF Security Officer
- a. Reworded Note preceding step 5.12.4 for clarity.
 - b. Step 5.12.4 - deleted "the" and changed "...station at the end of the hall across from the copy room." to "...at the double glass doors (entrance) on the west side of the building."
 - c. Step 5.12.6 - deleted "...using PEP-3.8.4, "Access Control".
 - d. Step 5.12.7 - changed to read "Record the names of all callout..." and added "...and provide them with Fitness for Duty forms."
 - e. Step 5.12.8 - added the word "any".

22. Section 5.14 - Emergency Switchboard Operator
 - a. Step 5.14.4 - changed "Determine..." to "Verify...".
23. Section 5.15 - EOF Health Physics Network (HPN) Communicator
 - a. Step 5.15.4 - changed "Determine..." to "Verify...".
24. Section 5.16 - Emergency Preparedness Representative
 - a. Deleted old step 5.17.5 and renumbered the subsequent steps.
 - b. Step 5.16.8 - change "Manager-Emergency Preparedness" to "Supervisor-Emergency Preparedness"
25. Attachment 6 - Facility Turnover/Briefing Work Sheet
 - a. Completely revised the worksheet.
26. Figures
 - a. Revised all figures for legibility and to allow computer storage with the procedure
27. Attachment 8 - Event Classification Message Display
 - a. Added attachment to assist in operation of the classification display board

I. OPEP-03.5.5

OPEP-03.5.5 Rev. 0 is a new procedure developed to incorporate the procedural processes and requirements previously contained in procedures OPEP-03.5.1, Confirmation of Offsite Dose Projections, OPEP-03.5.2, Expanded Environmental Monitoring, and OPEP-03.5.3, Plume Tracking by Actual Measurement. The procedure is written to provide a single document addressing environmental monitoring and plume tracking following a radiological event focusing on in-field activities. The development of this new procedure is an enhancement performed as part of the Plant Emergency Procedure (PEP) upgrade effort.

J. OPEP-03.6.1

- Revised "References" section to reflect recent procedural changes (i.e., new and cancelled procedures).
- Changed "Manager - Emergency Preparedness" to "Supervisor - Emergency Preparedness".

K. OPEP-03.6.3

1. Page 4

- Step 3.1 - deleted second sentence to remove Plant Sampling and Analysis Team Leader reference.
- Step 3.2 - deleted "...as required by the Plant Sampling and Analysis Team Leader."

2. Page 5

- Step 6.4 - reworded to change "...turned on Heat Tracing for Pass System, per PEP-02.1." to "...energized Heat Tracing for the PAS System."

3. Page 7

- Step 9.1.1 - changed "Plant Sampling and Analysis Team Leader" to "Radiological Controls Director" and reworded the remainder of the sentence.
- Note preceding Step 9.1.2, second sentence - changed "Plant Sampling and Analysis Team Leader" to "Dose Projection Coordinator" and reworded sentence to provide results to the RCM and RCD.

4. Page 9

- Step 10.1 - changed "BSEP" to "BNP".

5. Exhibit 3.6.3-1

- Corrected typographical error in "Analysis for Ba, Sr, Ls, Au"; Ls changed to La.

6. Exhibit 3.6.3-3

- Changed all references of "BSEP" to "BNP".

7. Exhibit 3.6.3-5

- Corrected typographical error in 0.10% fuel inventory released statement by changing "beating" to "heating".
- Revised graphic for a more legible copy.

8. Exhibit 3.6.3-6

- Changed references to "BSEP" to "BNP".

9. Attachment A

- Deleted statement associated with Plant Sampling and Analysis Team Leader

10. Attachment B

- Corrected graphical errors in Inventory Correction Factor formula.

11. Attachment A2

- Corrected graphical errors in Inventory Correction Factor formula.

12. Worksheet A3

- Changed reference to "BSEP" to "BNP".

13. Worksheet B1

- Changed references to "BSEP" to "BNP".

L. OPEP-03.6.5

Complete rewrite and format change. Included in this rewrite are position title changes to accurately reflect the current emergency response organization and changes made to clarify levels of responsibility and actions to be performed.

M. OPEP-03.7.6

OPEP-3.7.6 Rev. 0 is a new procedure developed to incorporate the procedural processes and requirements previously contained in procedures OPEP-03.8.3, Administration of Radioprotective Drugs, and OPEP-03.7.2, Emergency Personnel Monitoring and Dosimetry (selected portions). The procedure is written to address guidelines and administrative controls for potential or actual personnel exposures that exceed the federal limits defined in Title 10 Section 20 of the Code of Federal Regulations. The development of this new procedure is part of the Plant Emergency Procedure (PEP) upgrade effort.

N. OPEP-03.7.7

OPEP-3.7.7 Rev. 0 is a new procedure developed to incorporate the procedural processes and requirements previously contained in procedures OPEP-03.3.1, In-Plant Monitoring and Surveys, OPEP-03.3.5, Emergency Radiation Work Permits, OPEP-03.7.2, Emergency Personnel Monitoring and Dosimetry (selected portions), OPEP-03.7.3, Issuance and Use of Protective Gear, OPEP-03.7.4, Monitoring and Surveys for Personnel Habitability, OPEP-03.7.5, Monitoring and Decontamination of Vehicles Outside the Protected Area, and OPEP-03.8.4, Access Control (selected portions). OPEP-03.7.7 is written to address the guidelines and administrative controls for personnel exposures that remain below the federal limits defined in Title 10 Section 20 of the Code of Federal Regulations and limiting/minimizing the spread of contamination both on-site and to off-site area. Guidelines and administrative controls are included for emergency radiation work permits, habitability monitoring and control, personnel dosimetry, personnel protective gear, and vehicle monitoring and decontamination during classified emergency situations within this procedure. The development of this new procedure is part of the Plant Emergency Procedure (PEP) upgrade effort.

O. OPEP-04.2

1. General Changes

- Changed Manager - Emergency Preparedness to Supervisor - Emergency Preparedness.

2. Page 4

- Section 1.0, Second paragraph, first sentence - reworded.

3. Page 5

- Deleted information associated with the titles "Specialist" and "Site Public Information Coordinator" and renumbered the subsequent steps accordingly.

4. Page 6

- Step 6.5 - changed "Radwaste" to "LPU".
- Step 6.8 - add "...and LPU...".
- Step 8.1.1 - added second sentence.

5. Page 7

- Step 8.1.4 - changed "...Area "C" Office." to "...NCEM Operations Office."
- Step 8.1.6 - added the second and third sentences.
- Step 8.1.8 - changed "...personnel." to "...Help Desk (8-800-6200)."

6. Page 8

- Step 8.2 - changed (2nd and 4th Thursday of the month) to (26 times per year).
- Step 8.2.1 - revised step to provide specific direction on conduct of a silent test.
- Deleted old step 8.2.2 which was included in the specific direction of revised step 8.2.1 renumbered the subsequent.
- Step 8.2.4 - revised the step for clarity.
- Step 8.3 - changed "Thursday" to "Monday"
- Step 8.3.1 - inserted "...by Site Communications,...".
- Step 8.3.2 - new step

7. Page 9
 - Step 8.3.3 - new step, all subsequent steps renumbered.
 - Step 8.3.5 - revised step to provide specific direction on conduct of a growl test.
 - Step 8.3.6 - changed help desk number from (2222) to 8-800-6200.
8. Page 10
 - Step 8.4.2 - inserted "...by Site Communications,"
 - Steps 8.4.3 and 8.4.4 - new steps inserted and subsequent steps renumbered.
 - Step 8.4.6 - revised step to provide specific direction on conduct of a full volume test report.
 - Step 8.4.7 - inserted help desk number (8-800-6200).
 - Step 8.4.9 - revised step for clarity and provide more specific direction.
9. Page 11
 - Step 8.4.10 - changed "Once per calendar year..." to "In January...".
 - Deleted old step 8.7 and renumbered subsequent steps.
10. Attachment 1
 - Revised Table to specify from which facility the communications tests should originate from and to what NRC office they should be made.
11. Attachment 3
 - Complete revision
12. Attachment 4
 - Deleted Steps 7 and 8 and renumbered subsequent steps.
13. Attachment 5
 - Changed "Flair" to "Flair Type"
 - Changed "Record Log" to "Logbooks"
 - Deleted "Plant telephone directories Date of Rev."
14. Attachment 6
 - New attachment

P. OPEP-04.6

1. General Changes

- Changes made to reflect the movement of the Environmental Monitoring Kits from the Media Center to the Technical Training Center.
- Changed Manager - Emergency Preparedness to Supervisor - Emergency Preparedness
- Revised to reflect the cancellation of OPEP-03.7.5 and OPEP-03.8.3 and new procedures OPEP-03.7.6 and OPEP-03.7.7.

2. Attachment 2

- Revised to reflect the radiological instruments currently located in the emergency kits.

3. Attachments 11 and 12

- Added additional equipment to the lists.

Q. OPEP-04.8

1. General Changes

- Revised to change "Manager - Emergency Preparedness" to "Supervisor - Emergency Preparedness"
- Revised to change "Emergency Plan" to "Radiological Emergency Response Plan".
- Revised to change "Brunswick Training Unit" to "Brunswick Training Section".
- Revised to include PEP revisions requiring procedure implementation.

2. Page 4

- Step 3.3 - new step added and subsequent step renumbered.
- Step 4.1.4 - revised to add second sentence referencing submittal of revision summary of changes.

3. Page 5

- Step 4.1.7 - new step inserted to address revision summaries for PEPs and the Radiological Emergency Response Plan and subsequent steps renumbered.

R. OPEP-Appendix A

1. Reordered National Weather Service phone numbers.
2. Corrected State of South Carolina phone numbers.
3. Added INPO's new 800 phone and fax numbers.
4. Corrected NRC Resident pager numbers.
5. Reordered groups to match OPEP-02.6.21, Exhibit 4, Notification Checklist.
6. Added alternate numbers for Helicopter Service.
7. Set a 24 hour number for the Corporate Communications number.
8. Updated personnel information.

S. Cancelled Procedures

1. OPEP-03.3.1

The procedural processes and requirements of OPEP-03.3.1 have been incorporated in new procedure OPEP-03.7.7, On-site Radiological Controls and as a result OPEP-03.3.1 is being cancelled.

2. OPEP-03.3.5

The procedural processes and requirements of OPEP-03.3.5 have been incorporated in new procedure OPEP-03.7.7, On-site Radiological Controls and as a result OPEP-03.3.5 is being cancelled.

3. OPEP-03.5.1

The procedural processes and requirements of OPEP-03.5.1 have been incorporated into new procedure OPEP-03.5.5, Environmental Monitoring and Plume Tracking, and OPEP-02.6.6 Rev. 9. As a result, OPEP-03.5.1 is being cancelled.

4. OPEP-03.5.2

The procedural processes and requirements of OPEP-03.5.2 have been incorporated into new procedure OPEP-03.5.5, Environmental Monitoring and Plume Tracking, and OPEP-02.6.6 Rev. 9. As a result, OPEP-03.5.2 is being cancelled.

5. OPEP-03.5.3

The procedural processes and requirements of OPEP-03.5.3 have been incorporated into new procedure OPEP-03.5.5, Environmental Monitoring and Plume Tracking, and OPEP-02.6.6 Rev. 9. As a result, OPEP-03.5.3 is being cancelled.

6. OPEP-03.7.2

The procedural processes and requirements of OPEP-03.7.2 have been incorporated into new procedure OPEP-03.7.7, Onsite Radiological Controls and as a result, OPEP-03.7.2 is being cancelled.

7. OPEP-03.7.3

The procedural processes and requirements of OPEP-03.7.3 have been incorporated into new procedure OPEP-03.7.7, Onsite Radiological Controls and as a result, OPEP-03.7.3 is being cancelled.

8. OPEP-03.7.4

The procedural processes and requirements of OPEP-03.7.4 have been incorporated in new procedure OPEP-03.7.7, On-site Radiological Controls and as a result OPEP-03.7.4 is being cancelled.

9. OPEP-03.8.3

The procedural processes and requirements of OPEP-03.8.3 have been incorporated in new procedure OPEP-03.7.6, Emergency Exposure Controls and as a result OPEP-03.8.3 is being cancelled.

10. OPEP-03.8.4

The procedural processes and requirements of OPEP-03.8.4 have been incorporated in new procedure OPEP-03.7.7, On-site Radiological Controls and OPEP-03.8.2, Personnel Accountability and Evacuation; as a result, OPEP-03.8.4 is being cancelled.

ENCLOSURE 3
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50.325 & 50-324
LICENSE NOS. DPR-71 & DPR-62

REVISION TO PLANT EMERGENCY PROCEDURES

COPIES OF REVISED PLANT EMERGENCY PROCEDURES