

Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

JUL 11 1988

LYNN W. EURY
Senior Vice President
Operations Support

SERIAL: NLS-88-144
10CFR50.90
87TSB11

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
DELETION OF ORGANIZATION CHARTS

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), Units 1 and 2. The proposed changes delete the organization charts from the Technical Specifications (TS) in accordance with the guidelines provided in Generic Letter 88-06, "Removal of Organization Charts From Administrative Control Requirements" issued on March 22, 1988.

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 provides instructions for incorporation of the proposed changes into the Technical Specifications for each unit.

Enclosure 4 provides a summary of the proposed Technical Specification changes for each unit on a page by page basis.

Enclosures 5 and 6 provides the proposed Technical Specification pages for Unit 1 and Unit 2, respectively.

In accordance with the requirements of 10CFR170.12, a check for \$150 is also enclosed.

*Acc'd w/ check
\$150
995954*

Please refer any questions regarding this submittal to Mr. Stephen D. Floyd at (919) 836-6901.

Yours very truly,

L. W. Eury
L. W. Eury

LWE/DJK(\cor\)

Enclosures:

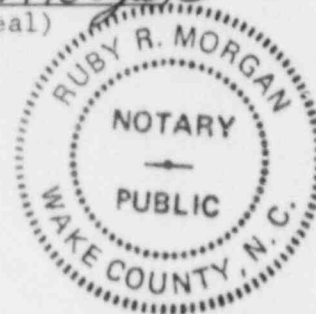
1. Basis for Change Request
2. 10CFR50.92 Evaluation
3. Instructions for Incorporation
4. Summary List of Revisions
5. Technical Specification Pages-Unit 1
6. Technical Specification Pages-Unit 2

cc: Mr. Dayne H. Brown
Mr. B. C. Buckley
Dr. J. Nelson Grace
Mr. W. H. Ruland

L. W. Eury, 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.

Ruby R. Morgan
Notary (seal)

My commission expires: 11/27/89



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
DELETION OF ORGANIZATION CHARTS

BASIS FOR CHANGE REQUEST

Proposed Change

Delete the organization charts (Figures 6.2.1-1, 6.2.2-1, and 6.2.2-2) from BSEP Technical Specifications by adding general requirements that capture the essential aspects of organizational structure defined by existing onsite and offsite organization charts. In addition, revise the Index to reflect the title change of Section 6.2.1. and delete reference to Figure 6.2.2-1 in Section 6.3.

Basis

The content required in the Administrative Control Section of the Technical Specifications (TS) is specified in 10CFR50.36.c(5). The regulation requires that the TS contain the controls and provisions that are necessary to assure operation of the facility in a safe manner and does not specifically require inclusion of organization charts in TS.

The removal of organization charts is a line item improvement that was proposed on a lead-plant basis for the Shearon Harris plant and was endorsed by the Westinghouse Owners Group. This change was reviewed as part of the NRC's program for improvements in TS. The objectives of that program were established by the Commission's Interim Policy Statement on TS Improvements. The Staff concluded that the removal of organization charts from TS will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure, consistent with Commission policy.

The NRC has encouraged licensees to propose changes to delete organization charts from their TS which are consistent with the guidance provided in Generic Letter 88-06.

References

1. Generic Letter 88-06, "Removal of Organization Charts From Administrative Control Requirements"
2. Shearon Harris Nuclear Power Plant, Amendment No. 3 to Facility Operating License, Appendix A, Technical Specifications

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
DELETION OF ORGANIZATION CHARTS

10CFR50.92 EVALUATION

The Commission has provided standards in 10CFR50.92(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

Delete the organization charts (Figures 6.2.1-1, 6.2.2-1, and 6.2.2-2) from BSEP Technical Specifications by adding general requirements that capture the essential aspects of organizational structure that are defined by existing onsite and offsite organization charts. In addition, revise the Index to reflect the title change of Section 6.2.1 and delete the reference to Figure 6.2.2-1 in Section 6.3.

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 deletion of the organization charts from the TS does not affect plant operation. As in the past, the NRC will continue to be informed of organizational changes through other required controls. The Code of Federal Regulations, Title 10, Part 50.34(b)(6)(i) requires that the organizational structure be included in the Final Safety Analysis Report (FSAR). Chapter 13 of the FSAR provides a description of the organization and detailed organization charts. As required by 10CFR50.71(e), the Company submits annual updates to the FSAR. Appendix B to 10CFR50 and 10CFR50.54(a)(3) govern changes to the organization described in the Quality Assurance program. Some of these organizational changes require prior NRC approval. Also, it is CP&L's practice

to inform the NRC of organizational changes affecting the nuclear facilities prior to implementation. The Company intends to continue this practice for future organizational changes.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change involves no physical alterations of plant configuration or changes to setpoints or operating parameters.
3. The proposed amendment does not involve a significant reduction in the margin of safety. Through the Company's strong Quality Assurance programs and its commitment to maintain only qualified personnel in positions of responsibility, it is assured that safety functions performed by the onsite and the Corporate organizations will continue to be performed at a high level of competence.

Based on the above reasoning, CP&L has determined that the proposed amendment does not involve a significant hazards consideration.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
DELETION OF ORGANIZATION CHARTS

INSTRUCTIONS FOR INCORPORATION

The proposed changes to the Technical Specifications (Appendix A to Operating Licenses DPR-71 and DPR-62) would be incorporated as follows:

UNIT 1

<u>Remove Page</u>	<u>Insert Page</u>
XIV	XIV
6-1	6-1
6-2	6-2
6-3 (DELETED)	--
6-4 (DELETED)	--
6-5 (DELETED)	--
6-8	6-8

UNIT 2

<u>Remove Page</u>	<u>Insert Page</u>
XIV	XIV
6-1	6-1
6-2	6-2
6-3 (DELETED)	--
6-4 (DELETED)	--
6-5 (DELETED)	--
6-8	6-8

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
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SUMMARY LIST OF REVISIONS

UNIT 1

<u>Pages</u>	<u>Description of Changes</u>
XIV	Revise the Index to change Section 6.2.1 title from "Offsite" to "Offsite and Onsite Organizations"
6-1	Section 6.2.1 - Delete reference to Figure 6.2.1-1 by adding general requirements that capture the essential aspects of organizational structure that was defined by onsite and offsite organization charts. Section 6.2.2 - Delete reference to Figure 6.2.2-1. Insert a new item d. to revise the section to include requirements for Shift Operator Supervisors, Shift Foremen, and Senior Control Operators to hold Senior Reactor Operator License and Control Operators to hold Reactor Operator License. Also re-letter item d. to e., item e. to f., item f. to g. and item g. to h.
6-3	Delete Figure 6.2.1-1
6-4	Delete Figure 6.2.2-1
6-5	Delete Figure 6.2.2-2
6-8	Section 6.3 - Delete reference to Figure 6.2.2-1 in Section 6.3.

ENCLOSURE 4 CONT'D

UNIT 2

<u>Pages</u>	<u>Description of Changes</u>
XIV	Revise the Index to change Section 6.2.1 title from "Offsite" to "Offsite and Onsite Organizations"
6-1	Section 6.2.1 - Delete reference to Figure 6.2.1-1 by adding general requirements that capture the essential aspects of organizational structure that was defined by onsite and offsite organization charts. Section 6.2.2 - Delete reference to Figure 6.2.2-1. Insert a new item d. to revise the section to include requirements for Shift Operator Supervisors, Shift Foremen, and Senior Control Operators to hold Senior Reactor Operator License and Control Operators to hold Reactor Operator License. Also re-letter item d. to e., item e. to f., item f. to g., and item g. to h.
6-3	Delete Figure 6.2.1-1
6-4	Delete Figure 6.2.2-1
6-5	Delete Figure 6.2.2-2
6-8	Section 6.3 - Delete reference to Figure 6.2.2-1 in Section 6.3.