



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

August 25, 2011

Mr. Michael J. Annacone, Vice President
Brunswick Steam Electric Plant
Carolina Power & Light Company
Post Office Box 10429
Southport, North Carolina 28461

**SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENTS REGARDING CHANGES TO TECHNICAL SPECIFICATION
5.3.1 FOR THE OPERATIONS MANAGER STATION STAFF POSITION
(TAC NOS. ME4686 AND ME4687)**

Dear Mr. Annacone:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued the enclosed Amendment No. 259 to Renewed Facility Operating License No. DPR-71 and Amendment No. 287 to Renewed Facility Operating License No. DPR-62 for Brunswick Steam Electric Plant (BSEP), Units 1 and 2, respectively. The amendments are in response to your application dated September 13, 2010.

The current technical specification (TS) 5.3.1, "Facility Staff Qualifications," requires meeting American National Standard Institute (ANSI) N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," with two exceptions. The first exception is for the qualification of the manager of the radiation control function, and the second one is for the qualification of the shift technical advisor.

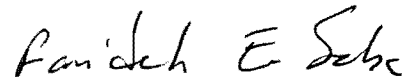
The amendments allow a third exception to ANSI N18.1 for the operations manager (OM) qualification. The amendments change the TS requirement specific to the OM holding a senior reactor operator (SRO) license. The revised BSEP, Units 1 and 2 TS 5.3.1 refer to TS 5.2.2.f, that states "The operations manager or assistant operations manager shall hold an SRO license." All other requirements for the OM, specified in ANSI N18.1-1971, such as a minimum of 8 years of responsible power plant experience, will be retained.

M. Annacone

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A copy of the related safety evaluation is also enclosed. A notice of issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Farideh E. Saba".

Farideh E. Saba, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-325 and 50-324

Enclosures:

1. Amendment No. 259 to
License No. DPR-71
2. Amendment No. 287 to
License No. DPR-62
3. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-325

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 259
Renewed License No. DPR-71

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by Carolina Power & Light Company (the licensee), dated September 13, 2010, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.


2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-71 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 259 , are hereby incorporated in the license. Carolina Power & Light Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION


Douglas A. Broaddus, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Operating License
and Technical Specifications

Date of Issuance: August 25, 2011

ATTACHMENT TO LICENSE AMENDMENT NO. 259
RENEWED FACILITY OPERATING LICENSE NO. DPR-71
DOCKET NO. 50-325

Replace Page 4 of Renewed Operating License DPR-71 with the attached Page 4.

Replace the following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove Pages

5.0-4

Insert Pages

5.0-4

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 259, are hereby incorporated in the license. Carolina Power & Light Company shall operate the facility in accordance with the Technical Specifications.

For Surveillance Requirements (SRs) that are new in Amendment 203 to Renewed Facility Operating License DPR-71, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 203. For SRs that existed prior to Amendment 203, including SRs with modified acceptance criteria and SRs whose frequency of performance is being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 203.

- (a) Effective June 30, 1982, the surveillance requirements listed below need not be completed until July 15, 1982. Upon accomplishment of the surveillances, the provisions of Technical Specification 4.0.2 shall apply.

Specification 4.3.3.1, Table 4.3.3-1, Items 5.a and 5.b

- (b) Effective July 1, 1982, through July 8, 1982, Action statement "a" of Technical Specification 3.8.1.1 shall read as follows:

ACTION:

- a. With either one offsite circuit or one diesel generator of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.A. sources by performing Surveillance Requirements 4.8.1.1.1.a and 4.8.1.1.2.a.4 within two hours and at least once per 12 hours thereafter; restore at least two offsite circuits and four diesel generators to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

- (3) Deleted by Amendment No. 206.

- D. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security Plan, Revision 2," and "Safeguards Contingency Plan, Revision 2," submitted by letter dated May 17, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004.

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

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- | | |
|-------|--|
| 5.3.1 | Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for: |
| a. | The manager of the radiation control function, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975; |
| b. | The shift technical advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant during transients and accidents; and |
| c. | The operations manager, who shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding holding an SRO license. |
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UNITED STATES
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WASHINGTON, D.C. 20555-0001

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-324

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 287
Renewed License No. DPR-62

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by Carolina Power & Light Company (the licensee), dated September 13, 2010, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

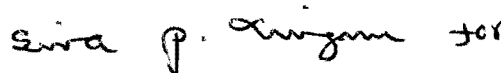
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment; and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-62 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 287 , are hereby incorporated in the license. Carolina Power & Light Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Douglas A. Broaddus, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Operating License
and Technical Specifications

Date of Issuance: August 25, 2011

ATTACHMENT TO LICENSE AMENDMENT NO. 287

RENEWED FACILITY OPERATING LICENSE NO. DPR-62

DOCKET NO. 50-324

Replace Page 3 of Renewed Operating License DPR-62 with the attached Page 3.

Replace the following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove Pages

5.0-4

Insert Pages

5.0-4

as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

(4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use in amounts as required any byproduct, source, and special nuclear materials without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components;

(5) Pursuant to the Act and 10 CFR Parts 30 and 70 to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of Brunswick Steam Electric Plant, Unit Nos. 1 and 2, and H. B. Robinson Steam Electric Plant, Unit No. 2

(6) Carolina Power & Light Company shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the Safety Evaluation Report dated November 22, 1977, as supplemented April 1979, June 11, 1980, December 30, 1986, December 6, 1989, July 28, 1993, and February 10, 1994 respectively, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is authorized to operate the facility at steady state reactor core power levels not in excess of 2923 megawatts (thermal).

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 287, are hereby incorporated in the license. Carolina Power & Light Company shall operate the facility in accordance with the Technical Specifications.

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

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- 5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:
- a. The manager of the radiation control function, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975;
 - b. The shift technical advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant during transients and accidents; and
 - c. The operations manager, who shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding holding an SRO license.
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 259 AND 287

TO RENEWED FACILITY OPERATING LICENSES NOS. DPR-71 AND 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 September 13, 2010 (Agencywide Documents and Management System (ADAMS) Accession No. ML102670189), Carolina Power & Light Company (the licensee), requested changes to the Technical Specifications (TS) for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2.

The current TS 5.3.1, "Facility Staff Qualifications," for BSEP, Units 1 and 2 require meeting American National Standard Institute (ANSI) N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," with two exceptions. The first exception is for the qualification of the manager of the radiation control function, and the second one is for the qualification of the shift technical advisor.

The amendments would allow a third exception to ANSI N18.1 for the operations manager (OM) qualification. The amendments change the TS requirement specific to the OM holding a senior reactor operator (SRO) license. The revised TS 5.3.1 for BSEP, Units 1 and 2 would refer to TS 5.2.2.f, that states "The operations manager or assistant operations manager shall hold an SRO license." All other requirements for the OM, specified in ANSI N18.1-1971, such as a minimum of 8 years of responsible power plant experience, would be retained.

2.0 REGULATORY EVALUATION

The Nuclear Regulatory Commission (NRC) regulatory requirements related to the content of the TS are set forth in Title 10 of *Code of Federal Regulations* (10 CFR), Section 50.36. This regulation requires that the TS include items in five specific categories. These categories include: 1) safety limits, limiting safety system settings and limiting control settings; 2) limiting conditions for operation; 3) surveillance requirements; 4) design features; and 5) administrative controls. Specifically, paragraph 50.36(c)(5) of 10 CFR describes administrative controls as "provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of each facility in a safe manner."

The NRC Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 3 provides current guidance that is acceptable to the NRC staff regarding qualifications and training for nuclear power plant personnel.

TS for BSEP, Units 1 and 2 specify certain minimum requirements for the plant staff. These requirements provide criteria for the selection and training of personnel, and address qualifications, responsibilities, and training of personnel in operating and supporting organizations appropriate for the safe and efficient operation of the power plants. Currently, TS 5.3.1 for BSEP, Units 1 and 2 require that each member of the facility staff, with two exceptions regarding qualification for the manager of radiation control function and shift technical advisor, shall meet or exceed the minimum qualifications of ANSI N18.1-1971.

The qualifications for an "OM" specified in ANSI N18.1-1971 include requiring the appointee to have 8 years of responsible power plant experience, with a minimum of three years nuclear power plant experience. Furthermore, at the time of appointment, the OM must hold an SRO license. The standard does not take precedence over any regulation. Further, ANSI N18.1-1971 does not explicitly list or otherwise discuss the requirements for an "Assistant Operations Manager (AOM)."

However, the current TS 5.2.2.f, as approved on November 4, 1998, for BSEP, Units 1 and 2 require that either the OM or the AOM have an SRO license. Thus, conflicting requirements in TS 5.3.1 and TS 5.2.2.f regarding whether the OM needed an SRO were created. Through this license amendment request, the licensee requested to add an additional exception to ANSI N18.1-1971 requirements regarding the OM qualifications to be consistent with the existing TS 5.2.2.f.

The reasons for the TS requirements that either the OM, or the AOM, have an SRO license are to ensure that the operations management can effectively communicate and interface with day-to-day operation aspects of the control room activities, and can communicate operation issues to higher levels of plant and utility management. This requirement is not being changed. The philosophy of specifying the minimum staffing requirements in the TS is also not being changed. Instead, the net effect of the proposed change is to remove one of two conflicting minimum qualifications requirements for the OM from the current TS for BSEP, Units 1 and 2.

As previously noted, ANSI N18.1-1971, which requires the OM to have an SRO license, does not explicitly list or otherwise discuss the requirements for an AOM. By contrast, ANSI/ANS-3.1-1993, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," recognized middle managers (i.e. the AOM), and provided that if the OM does not have an SRO license, then the "Middle Manager" shall hold an SRO license. Furthermore, in 2000, the NRC endorsed this optional SRO licensing for the OM via RG 1.8.

3.0 TECHNICAL EVALUATION

The licensee proposes to revise TS 5.3.1 concerning the minimum qualifications for the OM at BSEP, Units 1 and 2. The current TS 5.3.1 requires that each member of the facility staff meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for the manager of the radiation control function and shift technical advisor. Section 4.2.2 of ANSI N18.1-1971 states that at the time of initial core loading or appointment to the active

position, the OM shall hold an SRO License. The licensee's proposed change to TS 5.3.1 adds an additional exception for the OM regarding holding an SRO license.

The revised BSEP, Units 1 and 2 TS 5.3.1 refer to TS 5.2.2.f, which requires the OM or AOM hold an SRO license. The NRC has previously issued Amendment No. 204 to Facility Operating License No. DPR-71 and Amendment No. 234 to Facility Operating License No. DPR-62 revising TS 5.2.2.f concerning the requirements for OM's position (ADAMS Accession No. ML020370301). Thus, TS 5.2.2.f for BSEP, Units 1 and 2 currently require that either the OM or the AOM hold an SRO License.

The licensee stated that the proposed change to TS 5.3.1 would eliminate an inconsistency with TS 5.2.2.f. The proposed change would allow, as an alternative, an AOM to hold the required SRO license. The AOM that have an SRO license at BSEP will ensure that OM and the plant management maintain in-depth, plant-specific knowledge of the BSEP facility operation.

The modification to TS 5.3.1 for BSEP, Units 1 and 2 allows the licensee to appoint OM without an SRO license, if there is an SRO-qualified AOM available to oversee the licensed activities of licensed operators. The modification to the TS addresses the qualifications of the individuals with management authority over licensed individuals.

As discussed in Section 2 of this safety evaluation, RG 1.8, Revision 3 endorsed ANSI/ANS-3.1-1993 that allows the OM not to hold an SRO license, if a lower level OM, such as an AOM, holds an SRO license. The NRC staff finds the proposed change consistent with the requirements for the OM in RG 1.8. Additionally, all other requirements for the OM, specified in ANSI N18.1-1971, such as a minimum of 8 years of responsible power plant experience, will be retained. Further, the proposed change to TS 5.3.1 provides consistency with TS 5.2.2.f concerning the requirements for OM holding an SRO license. Therefore, the NRC staff concludes that addition of the licensee's proposed exception to the requirements of ANSI N18.1-1971 in TS 5.3.1 regarding the OM qualifications is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of North Carolina official was notified of the proposed issuance of the amendments. The State Official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments relate to changes with respect to recordkeeping, reporting, or administrative procedures or requirements. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (76 FR 6833; February 8, 2011). 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 the amendments.

6.0 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Sean Currie

Date: August 25, 2011

M. Annacone

- 2 -

A copy of the related safety evaluation is also enclosed. A notice of issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Farideh E. Saba, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-325 and 50-324

Enclosures:

1. Amendment No. 259 to
License No. DPR-71
2. Amendment No. 287 to
License No. DPR-62
3. Safety Evaluation

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