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SERIAL: NL&RAS-94-060

JUL 22 1994

William S. Orser  
Executive Vice President  
Nuclear Generation

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 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62  
REQUEST FOR LICENSE AMENDMENTS - PERFORMANCE BASED NUCLEAR  
ASSESSMENT PROGRAM

References: 1) Letter dated August 6, 1992, from R. B. Starkey, Jr. (CP&L) to USNRC  
2) Letter dated September 15, 1993, from H. W. Habermeyer, Jr. (CP&L) to USNRC

Gentlemen:

Carolina Power & Light Company (CP&L) requested by the referenced letters a revision to the Technical Specifications (TS) for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP). The proposed amendments would allow implementation of a performance based assessment program and corresponding functional and organizational changes in the Nuclear Assessment Department (NAD). In January 1994, CP&L requested that the NRC staff suspend their review of the proposed amendments pending further changes of the nuclear assessment function.

This letter provides a revised submittal incorporating the changes in the nuclear assessment function and the results of the NRC staff review of the referenced letters.

The major changes from the referenced submittals include the: 1) elimination of the NAD and the realignment of the Nuclear Assessment Section (NAS), reporting to the Vice President - Brunswick Nuclear Plant; 2) addition of a two-year frequency cap on performance-based assessments; and 3) revised Independent Review function and organization. Although there are only a few changes, CP&L withdraws our previous submittals and provides this submittal in accordance with 10 CFR 50.90 and 2.101. This submittal meets the criteria of a Cost Beneficial Licensing Action and represents a savings of approximately \$1 million/year when fully implemented at all of our nuclear plants. Quality Assurance Program changes are being submitted by separate letter (NL&RAS-94-059).

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The following enclosures are included with this letter:

Enclosure 1 - A summary of the proposed performance based assessment program and the corresponding organizational and functional changes.

Enclosure 2 - A summary of the proposed changes and the basis for each change.

Enclosure 3 - CP&L's basis for determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 4 - CP&L's basis for determination that the proposed changes require no environmental assessment.

Enclosure 5 - Marked-up TS pages -BSEP 1. Typed TS pages will be submitted later.

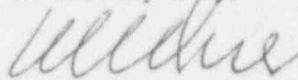
Enclosure 6 - Marked-up TS pages -BSEP 2. Typed TS pages will be submitted later.

CP&L is providing, in accordance with 10 CFR 50.91(b), the state of North Carolina with a copy of this license amendment request.

To allow orderly implementation of the proposed amendments, CP&L requests the amendments, upon approval by the NRC staff, be effective no later than 60 days from the issuance of the amendment.

Please refer any questions regarding this submittal to Mr. Gregg A. Sindors at (919) 546-7318.


Yours very truly,

  
W. S. Orser

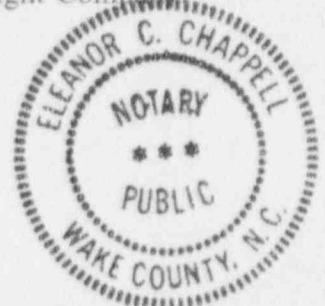
GAS/ebc  
Enclosures

c: Mr. Dayne H. Brown, NC  
Mr. S. D. Ebner, Regional Administrator, Region II  
Mr. P. D. Milano, NRR Senior Project Manager - Brunswick Units 1 and 2  
Ms. B. L. Mozafari, NRR Project Manager - HBRSEP  
Mr. R. L. Prevatte, Brunswick NRC Senior Resident Inspector

W. S. Orser, 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, and agents of Carolina Power & Light Company.

  
Notary (Seal)

My commission expires: 2/6/96



## ENCLOSURE 1

**BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
NRC DOCKET NO. 50-325 AND 50-324  
OPERATING LICENSE NOS. DPR-71 AND DPR -62  
REQUEST FOR LICENSE AMENDMENT  
PERFORMANCE-BASED NUCLEAR ASSESSMENT PROGRAM**

### SUMMARY OF ORGANIZATIONAL AND FUNCTIONAL CHANGES

Carolina Power and Light Company (CP&L) requests NRC approval of Technical Specification changes in order to implement the performance-based nuclear assessment program. Quality Assurance (QA) program changes are being requested by a separate letter. This enclosure provides an informational summary of the functional and organizational changes. Specific commitments are described in the Technical Specifications and QA Program description and not in this enclosure.

To improve the effectiveness and efficiency of the nuclear assessment (quality assurance/quality control) function, CP&L will make both organizational and functional program changes. Where no reduction in regulatory commitment is involved, CP&L will make the changes as allowed by 10 CFR 50.54(a)(3).

The majority of this submittal is similar to the original Technical Specification/QA program changes first submitted August 1992 and revised September 1993 after dialogue with NRC reviewers. CP&L withdraws the previous submittals. The major changes from the previous submittals include: 1) elimination of the Nuclear Assessment Department (NAD) and realignment of the Nuclear Assessment Section (NAS) reporting to the Site Vice President; 2) the addition of a 2 year frequency cap for performance based assessments; and 3) revised Independent Review (IR) function and organization.

The purpose of the nuclear assessment reorganization is to:

- Improve plant performance through strengthened self-assessment;
- Increase accountability for problem identification and effective corrective action within the plant organization;
- Strengthen the depth and scope of performance-based assessment;
- Improve translation of "lessons learned" throughout the Nuclear Generation Group; and
- Maintain senior management awareness of plant performance issues.

### Performance Evaluation Section

A Performance Evaluation Section (PES), reporting to the Vice President - Nuclear Services Department (NSD), will be established. The PES will provide a cadre of experienced assessment-trained, management-level, personnel to lead assessments and evaluate key areas of the plant and supporting organizations.

The primary functions of the PES are: 1) to independently assess the self-assessment and corrective action process of the line organization and the NAS; 2) to ensure that "lessons learned" are shared among the plants and support organizations; and 3) to facilitate the use of industry peer evaluators to identify industry best practices.

A PES-led self-assessment will be performed in each NRC Systematic Assessment of Licensee Performance (SALP) functional area once per SALP cycle. The PES evaluation teams will include peers from other CP&L plants and from the nuclear utility industry, as appropriate, to lend expertise to the self-assessment.

Self-assessment is a broad term, covering everything from self-checking to formal, documented evaluations of plant performance in a specific area, such as work control management. PES-led self-assessments will be documented evaluations. CP&L's three nuclear plants have adopted self-assessment as a way of doing business. The readiness for plant startup process is a good example of formal self-assessment. CP&L seeks to improve the formal self-assessment process by means of PES-led evaluations. The technical expertise of peer assessors coupled with the assessment skills of the PES assessors is expected to provide solid evaluations. Equally important, the assessment training instilled in the peer evaluators during the course of an assessment and the knowledge gained of plant practices at other CP&L plants by the peers will be most valuable.

The PES will by procedure evaluate the effectiveness of the site's self-assessment program, the site's ability to incorporate lessons learned from within CP&L as well as industry events, and the site's corrective action program. In addition to traditional assessment reports, this program will be facilitated by periodic peer group meetings between the PES Manager and each plant NAS Manager. There will also be periodic conference calls between these individuals during which operational experience and plant issues are discussed.

Written PES evaluations, including the results and recommended corrective actions, will be reported to plant and senior management.

The current Vendor and Equipment Quality function and the Quality Check (employee concern) program will be reassigned from the NAD to the NSD, where it will report to the Manager-PES. The realignment of corporate functions and reporting relationships are shown in Attachment 1A.

The benefits from the establishment of the PES include:

- Senior management will be informed of plant performance issues by an organization outside the plant line chain of command.
- An independent check of the NAS performance will be provided.
- Peers from other CP&L plants and from the nuclear utility industry, as appropriate, will be used on evaluation teams.
- The evaluation process will provide an additional means of exchanging operational experience among CP&L plants and other utilities.
- Evaluations will emphasize the key attributes of self-assessment, corrective action, and sharing of operating experience.

#### Nuclear Assessment Section

The proposed reorganization eliminates the NAD and realigns the plant NAS, reporting to the Site Vice President. The assignment of NAS as a direct report provides a valuable resource to the person held fully accountable for plant performance. The NAS will continue to conduct performance-based assessments to meet the 10 CFR 50, Appendix B, regulatory-required audits, and will assess to the Institute for Nuclear Power Operations performance standards rather than minimum compliance standards.

The NAS Manager will report to the most senior CP&L manager on site, the Site Vice-President. This will ensure independence from the plant production organization. Other nuclear utilities have developed similar organizational arrangements for their quality assurance organizations.

The NAS has been aligned consistent with the current NRC Systematic Assessment of Licensee Performance (SALP) categories. The NAS organization is provided for your information in Attachment 1B. The responsibilities for the Plant Operations and Plant Support Units are discussed below:

- Plant Operations - responsible for Operations, Maintenance, and Engineering and Technical Support.
- Plant Support - responsible for Environmental and Radiation Control and other support areas such as Emergency Preparedness, Security, Document Control, and Material Control.

This realignment will not diminish the emphasis on engineering and technical support within the section. In evaluating the workload of assessors in conjunction with the reorganization, it was determined that having two Engineering/Technical Support Project Engineers in the Operations Unit, coupled with the other engineering and related science personnel within the NAS was sufficient to meet the needs of the assessment and IR functions.



The NAS has highly qualified, experienced engineers at each plant. Further, these NAS engineering positions are rotational. The engineers and other NAS assessors are expected to rotate back into the line organization in two to five years. Thus, the engineering, operations, and maintenance expertise will stay current.

The NAS assessment process will remain consistent with that presently performed by the plant NAD sections. One benefit of the current process has been the use of peers from other plants during evaluations. As described in the PES peer discussion, the NAS assessment process also facilitates the exchange of information among CP&L plants.

The NAS will use CP&L peer engineering personnel and, if necessary, outside consultants, where specialized expertise is needed to ensure engineering areas are properly evaluated.

Upon NRC approval, the IR function will be reassigned from the NAD to the plant NAS. IR is currently performed by four engineers. Normally, one of the four engineers is assigned to plant special assessments. Effectively, there is one engineer per site performing IR. The reassignment would put one IR Project Engineer in each NAS, reporting to the Manager - NAS.

Documents requiring IR are currently reviewed by three separate engineers, through a three party review process, designed to ensure review by the appropriate discipline. CP&L is proposing a revision to this process which is consistent with ANSI N18.7, which requires review by the appropriate discipline.

In the event the IR Project Engineer does not have the appropriate discipline background to review a specific document, he will obtain the requested discipline expertise from within the NAS, and, if necessary, outside NAS to ensure the proper review is completed.

CP&L is proposing to integrate the IR function with the assessment/audit functions. The NAS has experienced personnel, who have engineering or related science degrees to carry out the IR function.

The benefits of the NAS reorganization include:

- Provides an additional tool to the Site Vice President for assessing and improving plant performance;
- Provides greater plant accountability for improved performance;
- Closely links the nuclear assessment function to plant needs;
- Provides for an independent assessment of plant performance since the NAS is outside the normal plant manager line function chain of command;
- Promotes line self-assessment;
- Uses expertise from other CP&L plants;
- Facilitates plant personnel assignments to other CP&L assessment teams; and
- Enhances personnel development by facilitating and stimulating rotation with the plant organization.

Significant Technical Specification/QA Program  
Functional Changes

Nuclear Assessment audits will be conducted at a frequency consistent with plant performance. In no case will the assessment (audit) cap of 24 months be exceeded. CP&L will not change its audit frequency limits until the 24 month cap is approved by the NRC in response to this request.

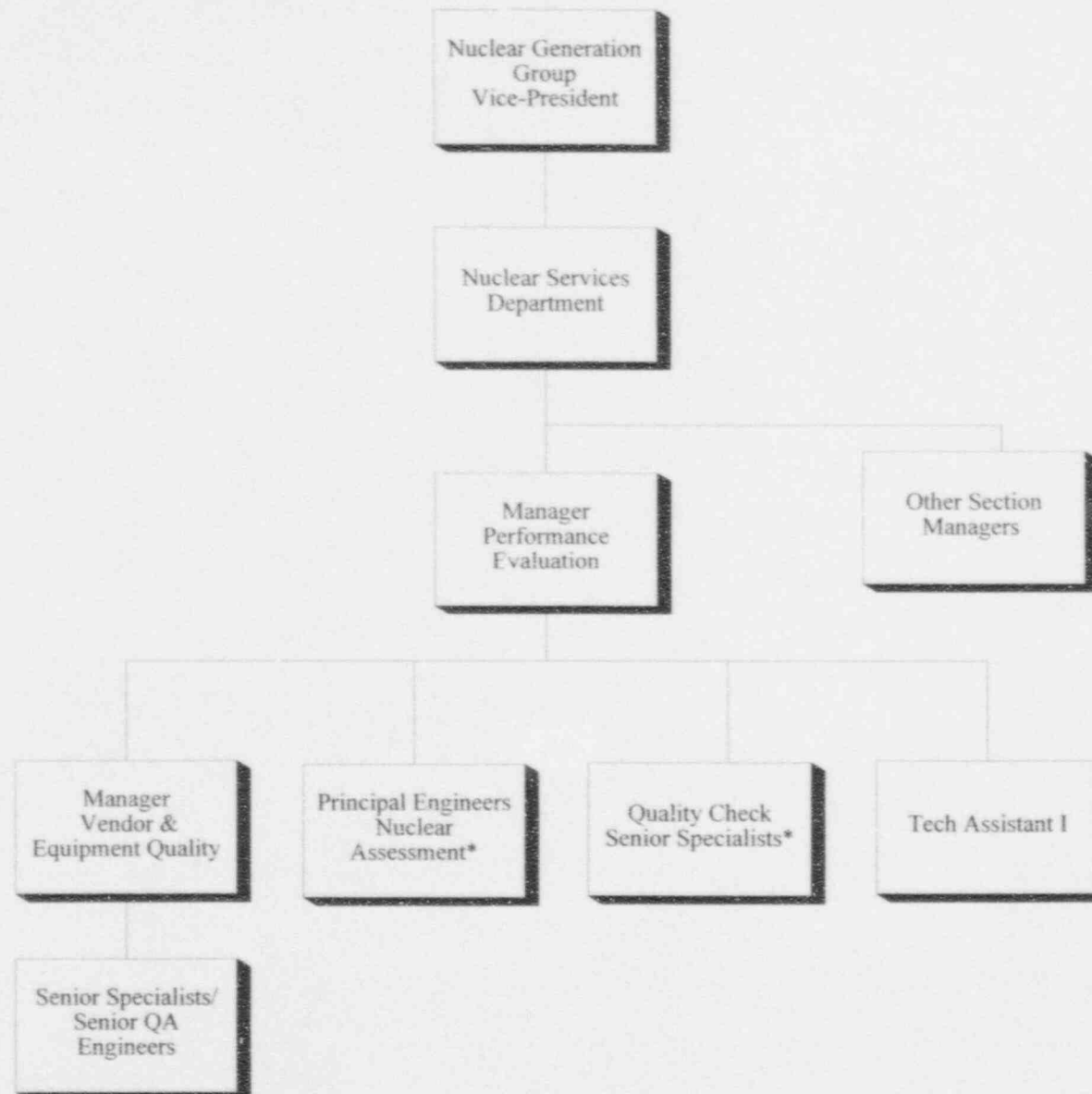
The bimonthly report of NAD issues is proposed to be revised to a periodic briefing of NAS issues to senior management. This will be normally done at the plant management review meeting. Nuclear Assessment issues will be discussed, including a review by the manager responsible for the corrective action.

The technical specification change details the transfer of the IR function from corporate NAD to the plant NAS. The IR function will be integrated into the NAS organization. The makeup of NAS personnel provides a broad experience base and diversity of academic/engineering disciplines for the IR and 10 CFR 50, Appendix B assessment functions.

IR will be performed in the applicable discipline(s) by qualified reviewers per applicable ANSI N18.7 requirements instead of the current three party review now performed for each plant. Should the IR Project Engineer not have the required discipline background to review a specific document, he will obtain the required discipline expertise from other qualified NAS reviewers, including going outside NAS, if necessary.

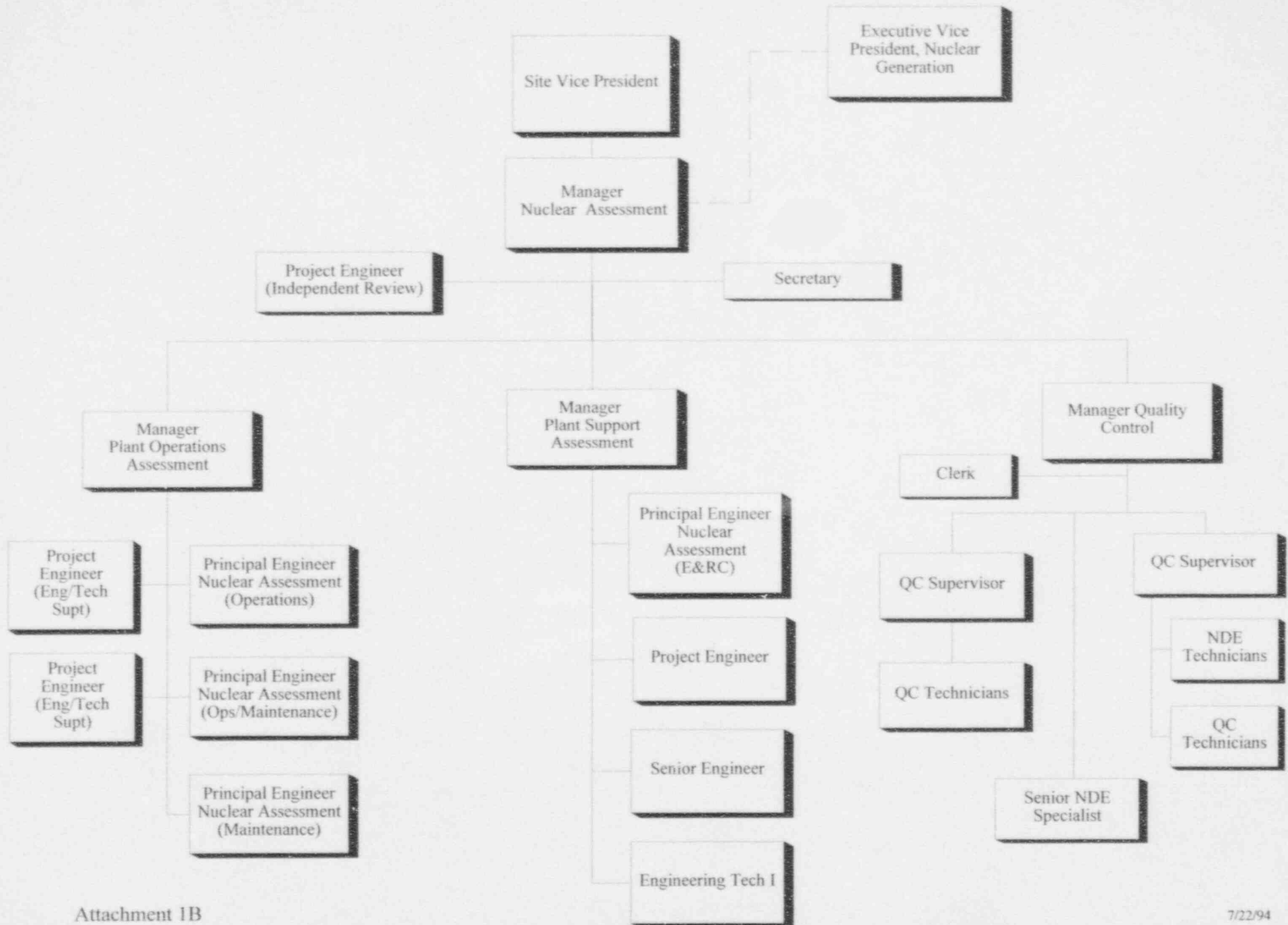


## Proposed Nuclear Services Department Organization



\* Located at plant

## BNP Proposed Nuclear Assessment Section



## ENCLOSURE 2

**BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
NRC DOCKET NO. 50-325 AND 50-324  
OPERATING LICENSE NOS. DPR-71 AND DPR -62  
REQUEST FOR LICENSE AMENDMENT  
PERFORMANCE-BASED NUCLEAR ASSESSMENT PROGRAM**

**SUMMARY OF PROPOSED CHANGES AND  
BASIS FOR EACH CHANGE REQUEST**

The proposed changes modify the following specific sections of the TS as indicated:

Section 6.2.3: Project Assessment (PA) Section

CHANGE: The proposed change deletes the existing 6.2.3. The functions described in this section related to oversight and assessment of unit operations and activities, have been integrated into 6.5.5 (Nuclear Assessment Section (NAS) Assessment Program). The NAS will perform the 10 CFR 50, Appendix B assessments and will conduct Independent Reviews.

BASIS: Combining the Independent Review and 10 CFR 50, Appendix B assessment functions will provide consistency among CP&L nuclear plants in the way these responsibilities are being implemented. Existing Section 6.2.3 is combined with proposed Section 6.5.5 (NAS Assessment Program) to make the Project Assessment Section activities and responsibilities part of the overall assessment process. The NAS is a multi-discipline group of engineers and technical specialists with experience in management, engineering, and technical specialties related to the operational activities of the unit. The makeup of the NAS provides a broad experience base and good diversity of discipline coverage for performing Independent Review and 10 CFR 50, Appendix B assessment functions.

Section 6.5.2: Operating License/Technical Specifications

CHANGE: The proposed changes to 6.5.2.9, 6.5.3.8, 6.5.4, 6.5.4.3, 6.5.4.5, 6.5.4.8 reflect the organizational titles of the NAS.

BASIS: The proposed reorganization eliminates the Nuclear Assessment Department and creates the NAS reporting to the Vice President - Brunswick Nuclear Plant. The changes to organizational titles reflect the proposed organization.

### Section 6.5.3: Plant Nuclear Safety Committee (PNSC)

CHANGE: The proposed changes to 6.5.3.3, 6.5.3.4, 6.4.3.5, 6.5.3.6, and 6.5.3.7. 1) identify functional areas comprising the PNSC in lieu of specific organizations/titles; 2) reformat the sections; 3) clarify the quorum requirements for PNSC; and 4) change requirement to identify alternates in writing to identify chairman, alternate chairmen, members, and alternate members in writing.

BASIS: Due to the many organizational revisions, including the implementation of the performance based assessment organization, the specific organizations/titles are being removed from the Technical Specifications and replaced by functional areas of responsibility. This change is similar to a change previously approved for CP&L's Harris Nuclear Plant. Reformatting the section and clarifying the quorum requirements are administrative changes which ease the readability of the section without changing the intent. Changing the requirement to identify chairman, alternate chairmen, and members, in addition to the current requirement of identifying members in writing, is a conservative change and ensures proper review of PNSC membership. Other current requirements are unaffected by this change.

CHANGE : The proposed changes to 6.5.3.8 e,f,k and m revises the organizations to which the PNSC distributes reports of their reviews for the purpose of further review and/or information.

BASIS: The proposed reorganization includes the elimination of the Manager - Nuclear Assessment Department and creates the NAS, which reports to the Vice President - Brunswick Nuclear Plant. The Vice President - Brunswick Nuclear Plant will continue to receive these reports. Nuclear Assessment will continue to see these reports as a member of the PNSC.

CHANGE: The proposed change to 6.5.3.9 deletes the Vice President - Nuclear Services from receiving notification of disagreements between the PNSC and the General Manager -Brunswick Nuclear Plant. Also, the title Manager - Brunswick Nuclear Plant is changed to Vice President - Brunswick Nuclear Plant.

BASIS: The proposed reorganization includes the elimination of the Manager - Nuclear Assessment Department and creates the NAS, which reports to the Vice President - Brunswick Nuclear Plant. The other change is an editorial change to reflect current organizational titles.

CHANGE: The proposed changes to 6.5.3.10 modify the distribution of PNSC minutes from Manager - Nuclear Assessment Department to the Manager - Nuclear Assessment Section and the title Manager - Brunswick Nuclear Plant is changed to Vice President - Brunswick Nuclear Plant..

BASIS: These are editorial changes to reflect the proposed organizational titles.

#### Section 6.5.4: NAS Independent Review Program

CHANGE: The proposed change to 6.5.4.2 modifies the wording from "specified in technical" to "qualified in specific" to provide consistency among CP&L nuclear facilities. Also, the words "associated with the unique characteristics of the nuclear power plant" are deleted from Item 1.

BASIS: The proposed change modifies the wording and list of discipline areas to provide consistency among CP&L nuclear plants and is consistent with the disciplines listed in ANSI N18.7.

CHANGE: The proposed changes to 6.5.4.3 and 6.5.4.4 changes the term from "academic" to "bachelor's" degree.

BASIS: The proposed change provides consistency among CP&L nuclear facilities.

CHANGE: The proposed change to 6.5.4.6 modifies the review process of the Independent Review function.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and is consistent with ANSI N18.7. The basis for requiring three reviews in the existing TS is to ensure that all applicable disciplines are encompassed. The proposed change specifically requires reviews in all applicable disciplines by qualified individuals. Specifically requiring three reviewers is unnecessarily restrictive and does not necessarily ensure appropriate reviews are performed.

CHANGE: The existing requirements of 6.5.4.9.a; 6.5.4.9.b; and 6.5.4.9.c are combined under the proposed 6.5.4.9.a and 6.5.4.9.b due to reformatting. The phrase "changes to procedures required by Specification 6.8" is replaced with "changes in procedures required by these Technical Specifications." The phrase "proposed modifications" is replaced with "proposed changes in the facility."

BASIS: The proposed changes modify the wording to provide consistency among CP&L nuclear facilities and is consistent with ANSI N18.7. The proposed change maintains the same degree of review. Since the procedures required by the TS exist, only changes to these procedures require Independent Review.

CHANGE: This existing requirement of 6.5.4.9.d is contained in proposed 6.5.4.9.c due to reformatting. The requirement to conduct an Independent Review "prior to implementation" has been added. ANSI N18.7 requires this Independent Review to be completed prior to implementation.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear plants and is consistent with ANSI N18.7.

CHANGE: The existing requirement of 6.5.4.9.e is contained in proposed Section 6.5.4.9.d.1 and 6.5.4.9.d.2 due to reformatting. Violations that require reporting to the NRC in writing will require an Independent Review.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and is consistent with ANSI N18.7.

CHANGE: This existing requirement of 6.5.4.9.f is contained in proposed 6.5.4.9.d.2 due to reformatting. Significant operating abnormalities or deviations that require reporting to the NRC in writing will require independent review.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and is consistent with ANSI N18.7.

CHANGE: This existing requirement of 6.5.4.9.g is contained in proposed 6.5.4.9.d.3 due to reformatting.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and is consistent with ANSI N18.7. The proposed change maintains the same degree of review.

CHANGE: The existing requirements of 6.5.4.9.h are being deleted. This required that a formal Independent Review be performed of the reports and minutes of the PNSC.

BASIS: The proposed change eliminates PNSC reports and minutes from formal Independent Review to provide consistency among CP&L nuclear facilities and is consistent with ANSI N18.7. In accordance with TS 6.5.3.10, the PNSC will forward its minutes to NAS so that the safety significant issues are identified.

CHANGE: The existing requirements of 6.5.4.9.i are moved to proposed 6.5.4.9.e due to reformatting.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and is consistent with ANSI N18.7. The proposed change maintains the same degree of review.

CHANGE: The existing requirements of 6.5.4.10 and 6.5.4.11.a are combined under the proposed 6.5.4.10 due to reformatting.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and is consistent with ANSI N18.7. Any identified adverse condition resulting from Independent Reviews are addressed as part of the Corrective Action Program (CAP).



CHANGE: This existing requirements of 6.5.4.11.b and c are deleted.

BASIS: The requirement of 6.5.4.11.b is deleted because any identified adverse conditions resulting from Independent Reviews are addressed as part of the CAP. The CAP is a formalized program that identifies, prioritizes, and responds to potentially adverse conditions that are identified by individuals or functional organizational units within CP&L. The CAP is required by the QA Program and do not need to be included in the Technical Specifications.

The reporting requirements of 6.5.4.11.c are part of the QA Program and does not need to be included in the Technical Specifications.

#### Section 6.5.5: NAS Assessment Program

CHANGE: The proposed change to 6.5.5 describes the Performance Based Assessment Program of NAS. The change revises the existing frequency based assessment program to a performance based assessment program with a frequency cap of 24 months. The requirement of 6.5.5.2.k is deleted. Also, the specific details of existing 6.5.5.3 through 6.5.5.9 have been deleted.

BASIS: The modification of assessment frequencies will allow assessments to be scheduled on the basis of plant performance. This change is consistent with NRC guidance in Section 17.3 of NUREG-0800, Standard Review Plan. The requirement of 6.5.5.2.k will be assessed based on performance and is covered by the proposed requirements of 6.5.5.1.g and i. The specific details of 6.5.5.3 through 6.5.5.9 are addressed in the QA program and our commitments to Regulatory Guide 1.144.

#### Section 6.5.6: Outside Agency Inspection and Audit Program

CHANGE: The proposed change deletes this section.

BASIS: The QA Program description in the UFSAR addresses the elements of an Assessment Program as identified in NUREG-0800, Section 17.3, and includes a requirement for a Fire Protection Assessment. 10 CFR 50.54(a)(1) requires implementation of a QA Program as described in the UFSAR.

Section 6.6 and 6.7: Reportable Event Action and Safety Limit Violations

CHANGE: The proposed changes to 6.6.1.b and 6.7.1.d revises the Manager - Nuclear Assessment Department to Manager - Nuclear Assessment Section from distribution for Reportable Events and Safety Limit Violations.

The proposed change to 6.7.1.b deletes the Manager - Nuclear Assessment Department from 24-hour notification of Safety Limit Violations.

BASIS: The proposed changes to 6.6.1.b and 6.7.1.d are editorial changes to reflect proposed organizational titles. The Manager - Nuclear Assessment Section is on distribution for the purpose of Independent Review. The change to 6.7.1.b is proposed because the Manager - Nuclear Assessment Section receives a copy of the Safety Limit Violation Report per 6.7.1.d and will review this information as a member of the PNSC.

## Section 6.10.2

CHANGE: The proposed change to 6.10.2 modifies the list of records to be retained for the duration of the license. The proposed change splits Item "n" and separates them into proposed Item "n" and new Item "o."

BASIS: The proposed change maintains the same types of records and retention requirements. This is an editorial change that clarifies the types of records that will be retained.

### ENCLOSURE 3

**BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
NRC DOCKET NO. 50-325 AND 50-324  
OPERATING LICENSE NOS. DPR-71 AND DPR -62  
REQUEST FOR LICENSE AMENDMENT  
PERFORMANCE-BASED NUCLEAR ASSESSMENT PROGRAM**

#### 10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(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 (CP&L) 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

The proposed amendment would implement a performance based assessment program, including corresponding organizational and functional changes. Specifically, the changes affect the Independent Review (IR) function and the independent assessment of plant activity. These functions will be performed by the proposed Nuclear Assessment Section (NAS).

The NAS, as proposed, would perform internal evaluations and assessment activities and serve as plant management's staff for the objective oversight of plant performance relating to nuclear safety, reliability, and quality. The Section's fundamental role is to: 1) assist plant management in the early identification of issues which may prevent the Brunswick Nuclear Plant from achieving quality performance on a sustained basis; and 2) ensure effective correction of deficiencies.

#### 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 it is a programmatic and administrative change which does not physically alter any safety-related systems, nor does it affect the way in which any safety-related systems perform their functions. Since the design of the facility and system operating parameters are not changing, the proposed amendment does not involve an increase in the probability or consequences of any accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in Item 1, the proposed amendment is a programmatic and administrative change which does not physically alter any safety-related systems; nor does it affect the way in which any safety-related systems perform their functions. Since the design of the facility and system operating parameters are not changing, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed amendment does not involve a significant reduction in the margin of safety because it is a programmatic and administrative change which provides assurance that plant operations continue to be conducted in a safe manner through the performance based assessment program. As stated in Item 1, the proposed amendment does not physically alter any safety-related systems; nor does it affect the way in which any safety-related systems perform their functions. Since the design of the facility and system operating parameters are not changing, the proposed amendment does not involve a significant reduction in the margin of safety.

## ENCLOSURE 4

**BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
NRC DOCKET NO. 50-325 AND 50-324  
OPERATING LICENSE NOS. DPR-71 AND DPR -62  
REQULST FOR LICENSE AMENDMENT  
PERFORMANCE-BASED NUCLEAR ASSESSMENT PROGRAM**

### ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site; and (3) result in an increase in an individual or cumulative occupational radiation exposure. Carolina Power & Light Company (CP&L) has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. This basis for this determination follows:

#### Proposed Change

The proposed amendment would implement a performance based assessment program, including corresponding organizational and functional changes. Specifically, the changes affect the Independent Review (IR) function and the independent assessment of plant activity. These functions will be performed by the proposed Nuclear Assessment Section (NAS).

The NAS, as proposed, would perform internal evaluations and assessment activities and serve as plant management's staff for the objective oversight of plant performance relating to nuclear safety, reliability, and quality.. The Section's fundamental role is to: 1) assist plant management in the early identification of issues which may prevent the Brunswick Nuclear Plant from achieving quality performance on a sustained basis; and 2) ensure effective correction of deficiencies.

#### Basis

This change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 3, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site.



The proposed change is programmatic and only revises Section 6, "Administrative Controls," of the Technical Specifications to reflect changes in the review and assessment function of the proposed NAS. The proposed amendment does not introduce any new equipment, nor does it require any existing equipment or systems to perform a different type of function than they are currently designed to perform. As such, the change cannot affect the types or amounts of any effluents that may be released off-site.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change is programmatic and only revises Section 6, "Administrative Controls," of the Technical Specifications to reflect changes in the review and assessment function of the proposed NAS. No additional surveillances or testing which could increase personnel exposure result from the amendment. Therefore, the amendment has no effect on either individual or cumulative occupational radiation exposure.