



SERIAL: LAP-83-350

Carolina Power & Light Company

AUG 10 1983

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
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  
STATUS OF THE BRUNSWICK DOCKET

Dear Mr. Eisenhut:

In the past 15 months, Carolina Power & Light Company (CP&L) has been taking extraordinary efforts to improve the quality of operations at the Brunswick Site. One of our major goals has been to ensure technical accuracy and agreement between the plant's physical design and construction, the Final Safety Analysis Report and the Technical Specifications. It is our desire to remove any ambiguity between these basic cornerstones for our operations such that requirements for operations, maintenance, and surveillance are clear and concise.

The Regional Office has been extremely supportive of our efforts for improvements; however, in the area of upgrading our Technical Specifications to reflect as-built conditions, we have not been successful. We have submitted more than 25 separate Technical Specification changes, many of which are many months old; yet, the required public notices have not yet been published in the Federal Register, nor is it apparent that any Staff review is underway. Additionally, as a result of our reviews, we are presently holding more than 15 change requests in-house which could be submitted quickly once the log jam of past requests is broken. The Office of Nuclear Reactor Regulation (NRR) has processed three Brunswick license amendments since January, 1983.

The problem is more than just an administrative one. Brunswick Unit 2 has been operating, with NRC concurrence, since the fall of 1982 under several proposed Technical Specifications while awaiting formal issuance from NRR. We are operating Brunswick Unit 1, with NRC concurrence, under several proposed Technical Specifications made necessary by NRC mandated equipment modifications. Because of this situation, the operator is then challenged to ensure he is referencing the proper Technical Specifications. The Company is demanding strict procedural compliance and attention to detail. Yet when the operator refers to the Technical Specifications, in many cases, he must turn to a page of proposed requirements to get the correct, however unofficial, specification. Although NRC has concurred with this arrangement, the situation is unfair to the operator and obviously undesirable.

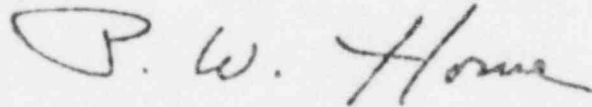
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In addition to the above, we foresee more problems in the future. Carolina Power & Light Company has made plans for additional plant modifications based on NRC mandates and orders which require Technical Specification changes (most notably Torus Level Monitoring & Radiological Effluent Technical Specifications). Based on past experience, the prospects for these Technical Specification changes being issued on time are not good.

A listing of the current outstanding Technical Specification change requests for Brunswick is attached for your information. I am anxious to work with you to resolve this backlog of change requests. I would like to meet with you as soon as possible to discuss how CP&L can help to solve this serious problem. We will arrange this meeting through our Project Manager.

Yours very truly,

A handwritten signature in dark ink, appearing to read "P. W. Howe". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

P. W. Howe  
Vice President - BSEP Project

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cc: Mr. D. O. Myers (NRC-BSEP)  
Mr. J. P. O'Reilly (NRC-RII)  
Mr. S. D. MacKay (NRC)  
Mr. G. C. Lainas (NRC)  
Mr. D. B. Vaesallo (NRC)