

Carolina Power & Light Company

Nuclear Services Department
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JUL 25 1991

SERIAL: NLS-91-121
10CFR50.54(a)(3)

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
QUALITY ASSURANCE PROGRAM CHANGES

Gentlemen:

Carolina Power & Light Company (CP&L) hereby requests approval for a change to the Quality Assurance (QA) Program for the Brunswick Steam Electric Plant (BSEP). This request is submitted in accordance with 10CFR50.54(a)(3) and is detailed in Enclosure 1.

The proposed change reflects CP&L's intent to remove the Corporate Quality Assurance (CQA) Department from in-line review and approval of processes related to the engineering documents. This proposed change reflects the adequacy of review processes being performed by the originating organizations, the elimination of redundant reviews, and focuses increased accountability on the organization performing the work to achieve the desired level of quality. The Nuclear Assessment Department will evaluate the overall performance of engineering activities on an ongoing basis.

The revised program will continue to provide assurance that review and approval of processes related to engineering documents would be satisfied. Thus, the BSEP QA Program would continue to meet the applicable 10CFR50 Appendix B criteria.

Enclosure 3 is being provided for your information only at this time. It describes related organizational changes that do not constitute a reduction in commitment to the QA Program. These changes have maintained an equivalent level of oversight/review to that currently described in the FSAR and, thus, have already been implemented.

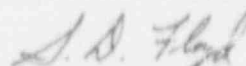
These changes will be incorporated into the FSAR in accordance with the provisions of 10CFR50.71(e).

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Should you have any questions regarding these changes, please contact Mr. Dale Bates at (919) 546-6154.

Yours very truly,



S. D. Floyd
Manager
Nuclear Licensing Section

DBB/jbw (1098GLU)

Enclosures

cc: Mr. S. D. Ebnetter
Mr. M. F. Jape (Region II)
Mr. N. B. Le
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ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT

QUALITY ASSURANCE PROGRAM CHANGE

QA PROGRAM CHANGE

Current Requirement

The current FSAR (Section 9.5.1.3.5.g.1) requires Operations QA/QC in-line review of modification packages to assure that post-modification acceptance tests are specified. This review is redundant to procedurally required in-line technical review within the originating engineering organization.

Proposed Change

This proposed change deletes the redundant in-line review by the QA staff. The originating engineering organization will continue to perform technical reviews in accordance with approved procedures.

Reason for Change

The change detailed in the transmittal reflects a removal of QA staff from in-line review activities related to engineering modification documents. These documents receive separate reviews by qualified reviewers within the originating organization for technical and quality assurance program adherence and adequacy, in accordance with approved procedures. The QA in-line reviews represent unnecessary redundancy and an undesirable dilution of responsibility for ensuring document adequacy.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

Technical reviews by qualified individuals will continue to verify the technical and quality assurance program adherence and adequacy of each new modification.

In addition to the normal reviews and controls, the Nuclear Assessment Department will independently evaluate the overall performance of the engineering activities on an ongoing basis.

Based upon these considerations, the removal of the in-line reviews by the QA Engineering Subunit will not result in any degradation of the review process.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT

FSAR PAGE MARK-UPS

BSEP 1 & 2
UPDATED FSAR

e) Operations QA/QC performs surveillances to assure that necessary test/inspections/surveillances by the Fire Protection group of fire protection systems, emergency breathing and auxiliary equipment, emergency lighting, and communication equipment are being performed as required.

f) Operations QA/QC performs surveillances of documentation to assure that the necessary test/inspections/surveillances of fire stops, seals, and fire retardant coatings are being performed.

g) Test and Test Control

INSERT #1

1) Operations QA/QC assures that acceptance tests are specified in plant modifications prior to the equipment being declared operable. Post-maintenance tests for repairs/replacements are reviewed by QA following work completion.

2) Corporate Quality Assurance includes fire protection periodic tests in the periodic audits of plant Operations to assure that the test schedule is being met.

3) Acceptance test results are included in plant modifications and post-maintenance test results are attached to Work Request & Authorization Forms (trouble tickets) when it is determined that tests are required. Operations QA/QC review both packages for completed documentation.

h) Inspection, Test, and Operating Status - Operations QA/QC includes in their inspections the review of tags, labels, or other temporary markings used to indicate completion of required inspections and tests, and operating status to assure compliance with procedures.

i) Nonconforming Items - The requirements specified in the Corporate Quality Assurance Manual for nonconforming items are met for fire protection equipment.

j) Corrective Action - Operations QA/QC assures that procedures are written to ensure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective components, uncontrolled combustible material, and nonconformances are promptly identified, reported, and corrected.

k) Records - Those records required to verify compliance with criteria of the Fire Protection Program are identifiable and retrievable and are assigned retention requirements.

l) Audits - Audits are performed by the Corporate Quality Assurance Audit Section.

9.5.1.3.6 Training

Training is an essential ingredient in developing and maintaining an effective fire protection program. Depending on job responsibilities, the intensity of training may range from a short introduction to fire safety to weeks of extensive training. Three distinct types of training are provided:

The requirements stated in Section 17.2.11 shall apply.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT

RELATED ORGANIZATION CHANGES

RELATED ORGANIZATIONAL CHANGES EFFECTIVE JANUARY 1, 1991

Operations QA/QC Units (On-Site)

The QA subunit of the Operations QA/QC Unit was deleted, with the surveillance functions of this subunit being assumed by the new Nuclear Assessment Department's Project Assessment Section (on-site). These surveillance functions are described in FSAR Sections 9.5.1 and 17.2.

QA Services Section (Corporate)

The Corporate QA Auditing Unit was deleted, with the 10CFR50 Appendix B audit requirements being assumed by the Nuclear Assessment Department's Nuclear Assessment Corporate Section. The audit functions are described in FSAR Sections 1.8, 9.5.1, and 17.2.