

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NOS. DPR-71 & DPR-62
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES
(NRC TAC NOS. 79845 AND 79846)

TECHNICAL SPECIFICATION PAGES - UNIT 1

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INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.1 RESPONSIBILITY</u>	6-1
<u>6.2 ORGANIZATION</u>	
6.2.1 OFFSITE AND ONSITE ORGANIZATIONS.....	6-1
6.2.2 FACILITY STAFF.....	6-1
6.2.3 PROJECT ASSESSMENT (PA)	
Function.....	6-5
Responsibilities.....	6-5
Authority.....	6-5
6.2.4 SHIFT TECHNICAL ADVISOR.....	6-5
<u>6.3 FACILITY STAFF QUALIFICATION</u>	6-5
<u>6.4 TRAINING</u>	6-5
<u>6.5 REVIEW AND AUDIT</u>	
6.5.1 NUCLEAR SAFETY REVIEWERS.....	6-6
6.5.2 SAFETY EVALUATIONS AND INDEPENDENT REVIEW CONTROL	
Safety Evaluations.....	6-6
Procedures, Tests, and Experiments.....	6-7
Modifications.....	6-7
Operating License/Technical Specifications.....	6-7
6.5.3 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)	
Function.....	6-8
Composition.....	6-8
Alternates.....	6-8
Meeting Frequency.....	6-8
Quorum.....	6-8
Activities.....	6-9
Authority.....	6-10
Records.....	6-10

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.5 REVIEW AND AUDIT (Continued)</u>	
6.5.4 NUCLEAR ASSESSMENT DEPARTMENT INDEPENDENT REVIEW PROGRAM	
Function.....	6-10
Organization.....	6-10
Review.....	6-11
Records.....	6-12
6.5.5 NUCLEAR ASSESSMENT DEPARTMENT AUDIT PROGRAM	
Function.....	6-13
Audits.....	6-13
Records.....	6-14
Authority.....	6-14
Personnel.....	6-14
6.5.6 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM.....	6-15
<u>6.6 REPORTABLE EVENT ACTION.....</u>	<u>6-15</u>
<u>6.7 SAFETY LIMIT VIOLATION.....</u>	<u>6-15</u>
<u>6.8 PROCEDURES AND PROGRAMS.....</u>	<u>6-16</u>
<u>6.9 REPORTING REQUIREMENTS</u>	
Routine Reports	6-17
Startup Reports.....	6-17
Annual Reports.....	6-18
Personnel Exposure and Monitoring Report.....	6-18
Annual Radiological Environmental Operating Report.....	6-19
Semiannual Radioactive Effluent Release Report.....	6-20
Monthly Operating Reports.....	6-21
Special Reports.....	6-22
Core Operating Limits Report.....	6-22

ADMINISTRATIVE CONTROLS

6.2.3 PROJECT ASSESSMENT (PA)

FUNCTION

6.2.3.1 The PA Group Unit shall function to examine facility operating characteristics, NRC issues, industry advisories, and other sources which may indicate areas for improving facility safety.

RESPONSIBILITIES

6.2.3.2 The PA Group Unit shall be responsible for maintaining surveillance of facility activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.3 The PA Group Unit shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving facility safety to the Manager - Nuclear Assessment Department.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

6.3 FACILITY STAFF QUALIFICATION

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions^(a), except for (1) the Manager - Environmental & Radiation Control who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) 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.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Manager - Training (BSEP) and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Manager - Training (BSEP) and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975.

* Not responsible for sign-off function.

(a) The requirement for the Manager - Operations to hold or have held a senior reactor operator license is exempted for a period of 18 months starting from June 13, 1991.

ADMINISTRATIVE CONTROLS

PROCEDURES, TESTS, AND EXPERIMENTS

6.5.2.4 The safety evaluation prepared in accordance with Specifications 6.5.2.1.a and 6.5.2.1.b above shall include a written determination, with basis, of whether or not the procedures, proposed tests and experiments, and changes thereto constitute an unreviewed safety question as defined in 10 CFR 50.59, or whether they involve a change to the Technical Specifications.

6.5.2.5 Following the nuclear safety review, the procedures required by Specification 6.8, other procedures that affect nuclear safety, proposed tests or experiments, and changes thereto (other than editorial or typographical) which have been determined to not involve an unreviewed safety question as defined in 10 CFR 50.59 or change to the Technical Specifications shall be approved prior to implementation by the General Manager - Brunswick Plant or his previously designated alternate.

MODIFICATIONS

6.5.2.6 The safety evaluation prepared in accordance with Specification 6.5.2.1.c above shall include a written determination, with basis, of whether or not the proposed modification is a change in the facility as described in the safety analysis report, involves a change to the Technical Specifications, or constitutes an unreviewed safety question as defined in 10 CFR 50.59.

6.5.2.7 Following the nuclear safety review, proposed modifications which have been determined to not involve an unreviewed safety question as defined in 10 CFR 50.59 or a change to the Technical Specifications shall be approved by the General Manager - Brunswick Plant or his previously designated alternate.

OPERATING LICENSE/TECHNICAL SPECIFICATIONS

6.5.2.8 The safety evaluation prepared in accordance with Specifications 6.5.2.1.d and 6.5.2.1.e above shall include a written preliminary determination, with basis, of whether or not the proposed Operating License/Technical Specification change(s) is a change in the facility as described in the safety analysis report.

6.5.2.9 Following the nuclear safety review of the safety evaluation prepared in accordance with Specifications 6.5.2.1.d and 6.5.2.1.e above and the associated proposed action, the request shall be:

- a. Reviewed by the Plant Nuclear Safety Committee in accordance with Specification 6.5.3.8.
- b. Reviewed by the Nuclear Assessment Department Section in accordance with Specification 6.5.4.9.

ADMINISTRATIVE CONTROLS

ACTIVITIES

6.5.3.8 The PN3C activities shall include the following:

- a. Review of all procedures required by Specification 6.8 and changes thereto (and any other procedures and changes thereto), any of which constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- b. Review of all proposed tests or experiments that constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- c. Review of all proposed modifications that constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
- d. Review of all proposed changes to the Technical Specifications or Operating License, prior to implementation.
- e. Review of reports on violations of Technical Specifications including reports covering evaluation and recommendations to prevent recurrence to the Manager - Brunswick Nuclear Project and to the Manager - Nuclear Assessment Department.
- f. Performance of special reviews, investigations (or analyses), and reports thereon as requested by the Manager - Nuclear Assessment Department.
- g. Review of all REPORTABLE EVENTS.
- h. Review of facility operations to detect potential nuclear safety hazards.
- i. Annual review of the Security Plan.
- j. Annual review of the Emergency Plan.
- k. Review of accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Manager - Brunswick Nuclear Project and the Manager - Nuclear Assessment Department.
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.3.9 If there is a disagreement between recommendations of a majority of the PNSC and the actions contemplated by the General Manager - Brunswick Plant, the PNSC shall provide written notification within 24 hours to the Manager - Brunswick Nuclear Project and the Vice President - Nuclear Services. The course determined by the General Manager - Brunswick Plant to be the most conservative shall be followed.

RECORDS

6.5.3.10 The PNSC shall maintain written minutes of each PNSC meeting that, at a minimum, document the results of all PNSC activities performed under the provisions of these Technical Specifications. Copies shall be provided to the Manager - Brunswick Nuclear Project and the Manager - Nuclear Assessment Department.

6.5.4 NUCLEAR ASSESSMENT DEPARTMENT INDEPENDENT REVIEW PROGRAM

FUNCTION

6.5.4.1 The Nuclear Assessment Department shall function to provide independent review of significant plant changes, tests, and procedures; verify that REPORTABLE EVENTS are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer.

ORGANIZATION

6.5.4.2 The individuals assigned responsibility for independent reviews shall be specified in technical disciplines. These individuals shall collectively have the experience and competence required to review activities in the following areas:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. non-destructive testing
- f. instrumentation and control
- g. radiological safety
- h. mechanical and electrical engineering
- i. administrative controls

ADMINISTRATIVE CONTROLS

ORGANIZATION (Continued)

- j. seismic and environmental
- k. quality assurance practices
- l. Other appropriate fields associated with the unique characteristics of the nuclear power plant.

6.5.4.3 The Manager - Nuclear Assessment Department shall have an academic degree in an engineering or related field and, in addition, shall have a minimum of ten years related experience, of which a minimum of five years shall be in the operation and/or design of nuclear power plants.

6.5.4.4 The independent safety review program reviewers shall have an academic degree in an engineering or related field or equivalent and, in addition, shall have a minimum of five years related experience.

6.5.4.5 An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Nuclear Assessment Department, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

6.5.4.6 At least three individuals, qualified as discussed in 6.5.4.4 above, shall review each item submitted under the requirements of Section 6.5.4.9.

6.5.4.7 Independent safety reviews shall be performed by individuals not directly involved with the activity under review or responsible for the activity under review.

6.5.4.8 The Nuclear Assessment Department independent safety review program shall be conducted in accordance with written, approved procedures.

REVIEW

6.5.4.9 The Nuclear Assessment Department shall perform reviews of the following:

- a. The safety evaluations for 1) changes to procedures required by Specification 6.8, 2) modifications of equipment or systems, and 3) tests or experiments that constitute a change to the safety analysis report to verify that such actions did not constitute an unreviewed safety question or involve a change to the Technical Specifications. Implementation may proceed prior to completion of this review.
- b. Proposed changes to procedures required by Specification 6.8, and proposed modifications that constitute an unreviewed safety question as defined in 10 CFR 50.59 or a change to the Technical Specifications, prior to implementation.

ADMINISTRATIVE CONTROLS

REVIEW (Continued)

- c. Proposed tests or experiments that involve an unreviewed safety question as defined in 10 CFR 50.59 or a change to the Technical Specifications, prior to implementation.
- d. Proposed changes to the Technical Specifications and Operating License.
- e. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements, and internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant safety-related structures, systems, or components.
- g. Reportable events.
- h. Reports and minutes of the PNSC.
- i. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Department deems appropriate for consideration or which is referred to the Manager - Nuclear Assessment Department by the on-site operating organization or other functional organizational units within Carolina Power & Light Company.

6.5.4.10 Review of items considered under 6.5.4.9(e) through (i) above shall include the results of any investigations made and the recommendations resulting from these investigations to prevent or reduce the probability of recurrence of the event.

RECORDS

6.5.4.11 Records of Nuclear Assessment Department reviews, including recommendations and concerns, shall be prepared and distributed as indicated below:

- a. Copies of documented reviews shall be retained in the Nuclear Assessment Department files.
- b. Recommendations and concerns shall be submitted to the General Manager - Brunswick Plant and Manager - Brunswick Nuclear Project, within 14 days of completion of the review.
- c. A summation of Nuclear Assessment Department's recommendations and concerns shall be submitted to the Chairman/President; Executive Vice President - Power Supply; Senior Vice President - Nuclear Generation; Vice President - Nuclear Services; Manager - Brunswick Nuclear Project; General Manager - Brunswick Plant; and others, appropriate, at least once every two months.

ADMINISTRATIVE CONTROLS

6.5.5 NUCLEAR ASSESSMENT DEPARTMENT AUDIT PROGRAM

FUNCTION

6.5.5.1 The Nuclear Assessment Department shall function to perform audits of facility activities specified in Specification 6.5.5.2.

AUDITS

6.5.5.2 Audits of facility activities shall be performed by the Nuclear Assessment Department. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety at least once per 6 months.
- d. The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Emergency Plan and implementing procedures at least once per 12 months.
- f. The Security Plan and implementing procedures at least once per 12 months.
- g. The Facility Fire Protection Program and implementing procedures at least once per 12 months.
- h. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- i. The OFFSITE DOSE CALCULATIONAL MANUAL and implementing procedures at least once per 24 months.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

ADMINISTRATIVE CONTROLS

AUDITS (Continued)

- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974, and Regulatory Guide 4.1, Revision 1, April 1975, at least once per 12 months.
1. Any other area of facility operation considered appropriate by the Manager - Nuclear Assessment Department.

6.5.5.3 Personnel performing the audits shall have access to the plant operating records.

RECORDS

6.5.5.4 Records of audits shall be prepared and retained.

6.5.5.5 Audit reports encompassed by 6.5.5.2 above shall be prepared, approved by the Manager - Nuclear Assessment Department, and forwarded to the Executive Vice President - Power Supply; Senior Vice President - Nuclear Generation; Manager - Brunswick Nuclear Project; General Manager - Brunswick Plant; and others, as appropriate, within 30 days after completion of the audit.

AUTHORITY

6.5.5.6 The Manager - Nuclear Assessment Department shall be responsible for the following:

- a. The administering of the Nuclear Assessment Department Audit Program.
- b. The approval of the individual(s) selected to conduct audits.

PERSONNEL

6.5.5.7 Audit personnel shall be independent of the area audited.

6.5.5.8 Selection of personnel for auditing assignments shall be based on experience or training that establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting audit personnel, consideration shall be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.

6.5.5.9 Qualified outside consultants or other individuals independent from those personnel directly involved in plant operation shall be used to augment the audit teams when necessary.

ADMINISTRATIVE CONTROLS

6.5.6 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM

6.5.6.1 An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.

6.5.6.2 An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the Plant Nuclear Safety Committee - Brunswick Plant and shall be submitted to the Manager - Nuclear Assessment Department and the Manager - Brunswick Nuclear Project.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT SHUTDOWN within two hours.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Manager - Brunswick Nuclear Project and the Manager - Nuclear Assessment Department shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the General Manager - Brunswick Plant. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Manager - Brunswick Nuclear Project, and the Manager - Nuclear Assessment Department within 14 days of the violation.

ADMINISTRATIVE CONTROLS

RECORDS RETENTION (Continued)

- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- l. Records of the service lives of all hydraulic and mechanical snubbers referenced in Section 3.7.5 including the data at which the service life commences and associated installation and maintenance records.
- m. Records of analyses required by the radiological environmental monitoring program.
- n. Records of (1) meetings of the PNSC, (2) meetings of the previous off-site review organization, the Company Nuclear Safety Committee (CNSC), (3) the independent reviews performed by the Nuclear Assessment Department, and (4) the independent reviews performed by the Corporate Quality Assurance Audit Program, Quality Assurance Auditing Unit.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "Control Device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each high radiation area in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

* Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NOS. DPR-71 & DPR-62
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES
(NRC TAC NOS. 79845 AND 79846)

TECHNICAL SPECIFICATION PAGES - UNIT 2

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.1 RESPONSIBILITY</u>	6-1
<u>6.2 ORGANIZATION</u>	
6.2.1 OFFSITE AND ONSITE ORGANIZATIONS.....	6-1
6.2.2 FACILITY STAFF.....	6-1
6.2.3 PROJECT ASSESSMENT (PA)	
Function.....	6-5
Responsibilities.....	6-5
Authority.....	6-5
6.2.4 SHIFT TECHNICAL ADVISOR.....	6-5
<u>6.3 FACILITY STAFF QUALIFICATION</u>	6-5
<u>6.4 TRAINING</u>	6-5
<u>6.5 REVIEW AND AUDIT</u>	
6.5.1 NUCLEAR SAFETY REVIEWERS.....	6-6
6.5.2 SAFETY EVALUATIONS AND INDEPENDENT REVIEW CONTROL	
Safety Evaluations.....	6-6
Procedures, Tests, and Experiments.....	6-7
Modifications.....	6-7
Operating License/Technical Specifications.....	6-7
6.5.3 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)	
Function.....	6-8
Composition.....	6-8
Alternates.....	6-8
Meeting Frequency.....	6-8
Quorum.....	6-8
Activities.....	6-9
Authority.....	6-10
Records.....	6-10

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.5 REVIEW AND AUDIT (Continued)</u>	
6.5.4 NUCLEAR ASSESSMENT DEPARTMENT INDEPENDENT REVIEW PROGRAM	
Function.....	6-10
Organization.....	6-10
Review.....	6-11
Records.....	6-12
6.5.5 NUCLEAR ASSESSMENT DEPARTMENT AUDIT PROGRAM	
Function.....	6-13
Audits.....	6-13
Records.....	6-14
Authority.....	6-14
Personnel.....	6-14
6.5.6 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM.....	6-15
<u>6.6 REPORTABLE EVENT ACTION.....</u>	<u>6-15</u>
<u>6.7 SAFETY LIMIT VIOLATION.....</u>	<u>6-15</u>
<u>6.8 PROCEDURES AND PROGRAMS.....</u>	<u>6-16</u>
<u>6.9 REPORTING REQUIREMENTS</u>	
Routine Reports	6-17
Startup Reports.....	6-17
Annual Reports.....	6-18
Personnel Exposure and Monitoring Report.....	6-18
Annual Radiological Environmental Operating Report.....	6-19
Semiannual Radioactive Effluent Release Report.....	6-20
Monthly Operating Reports.....	6-21
Special Reports.....	6-22
Core Operating Limits Report.....	6-22

ADMINISTRATIVE CONTROLS

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(a) The requirement for the Manager - Operations to hold or have held a senior reactor operator license is exempted for a period of 18 months starting from June 13, 1991.

ADMINISTRATIVE CONTROLS

PROCEDURES, TESTS, AND EXPERIMENTS

6.5.2.4 The safety evaluation prepared in accordance with Specifications 6.5.2.1.a and 6.5.2.1.b above shall include a written determination, with basis, of whether or not the procedures, proposed tests and experiments, and changes thereto constitute an unreviewed safety question as defined in 10 CFR 50.59, or whether they involve a change to the Technical Specifications.

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- a. Reviewed by the Plant Nuclear Safety Committee in accordance with Specification 6.5.3.8.
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ADMINISTRATIVE CONTROLS

ACTIVITIES

6.5.3.8 The PNSC activities shall include the following:

- a. Review of all procedures required by Specification 6.8 and changes thereto (and any other procedures and changes thereto), any of which constitute an unreviewed safety question or involve a change to the Technical Specifications, prior to implementation.
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- g. Review of all REPORTABLE EVENTS.
- h. Review of facility operations to detect potential nuclear safety hazards.
- i. Annual review of the Security Plan.
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ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.3.9 If there is a disagreement between recommendations of a majority of the PNSC and the actions contemplated by the General Manager - Brunswick Plant, the PNSC shall provide written notification within 24 hours to the Manager - Brunswick Nuclear Project and the Vice President - Nuclear Services. The course determined by the General Manager - Brunswick Plant to be the most conservative shall be followed.

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6.5.4 NUCLEAR ASSESSMENT DEPARTMENT INDEPENDENT REVIEW PROGRAM

FUNCTION

6.5.4.1 The Nuclear Assessment Department shall function to provide independent review of significant plant changes, tests, and procedures; verify that REPORTABLE EVENTS are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer.

ORGANIZATION

6.5.4.2 The individuals assigned responsibility for independent reviews shall be specified in technical disciplines. These individuals shall collectively have the experience and competence required to review activities in the following areas:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. non-destructive testing
- f. instrumentation and control
- g. radiological safety
- h. mechanical and electrical engineering
- i. administrative controls

ADMINISTRATIVE CONTROLS

ORGANIZATION (Continued)

- j. seismic and environmental
- k. quality assurance practices
- l. Other appropriate fields associated with the unique characteristics of the nuclear power plant.

6.5.4.3 The Manager - Nuclear Assessment Department shall have an academic degree in an engineering or related field and, in addition, shall have a minimum of ten years related experience, of which a minimum of five years shall be in the operation and/or design of nuclear power plants.

6.5.4.4 The independent safety review program reviewers shall have an academic degree in an engineering or related field or equivalent and, in addition, shall have a minimum of five years related experience.

6.5.4.5 An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Nuclear Assessment Department, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

6.5.4.6 At least three individuals, qualified as discussed in 6.5.4.4 above, shall review each item submitted under the requirements of Section 6.5.4.9.

6.5.4.7 Independent safety reviews shall be performed by individuals not directly involved with the activity under review or responsible for the activity under review.

6.5.4.8 The Nuclear Assessment Department independent safety review program shall be conducted in accordance with written, approved procedures.

REVIEW

6.5.4.9 The Nuclear Assessment Department shall perform reviews of the following:

- a. The safety evaluations for 1) changes to procedures required by Specification 6.8, 2) modifications of equipment or systems, and 3) tests or experiments that constitute a change to the safety analysis report to verify that such actions did not constitute an unreviewed safety question or involve a change to the Technical Specifications. Implementation may proceed prior to completion of this review.
- b. Proposed changes to procedures required by Specification 6.8, and proposed modifications that constitute an unreviewed safety question as defined in 10 CFR 50.59 or a change to the Technical Specifications, prior to implementation.

ADMINISTRATIVE CONTROLS

REVIEW (Continued)

- c. Proposed tests or experiments that involve an unreviewed safety question as defined in 10 CFR 50.59 or a change to the Technical Specifications, prior to implementation.
- d. Proposed changes to the Technical Specifications and Operating License.
- e. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements, and internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant safety-related structures, systems, or components.
- g. Reportable events.
- h. Reports and minutes of the PNSC.
- i. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Department deems appropriate for consideration or which is referred to the Manager - Nuclear Assessment Department by the on-site operating organization or other functional organizational units within Carolina Power & Light Company.

6.5.4.10 Review of items considered under 6.5.4.9(e) through (i) above shall include the results of any investigations made and the recommendations resulting from these investigations to prevent or reduce the probability of recurrence of the event.

RECORDS

6.5.4.11 Records of Nuclear Assessment Department reviews, including recommendations and concerns, shall be prepared and distributed as indicated below:

- a. Copies of documented reviews shall be retained in the Nuclear Assessment Department files.
- b. Recommendations and concerns shall be submitted to the General Manager - Brunswick Plant and Manager - Brunswick Nuclear Project, within 14 days of completion of the review.
- c. A summation of Nuclear Assessment Department's recommendations and concerns shall be submitted to the Chairman/President; Executive Vice President - Power Supply; Senior Vice President - Nuclear Generation; Vice President - Nuclear Services; Manager - Brunswick Nuclear Project; General Manager - Brunswick Plant; and others, appropriate, at least once every two months.

6.5.5 NUCLEAR ASSESSMENT DEPARTMENT AUDIT PROGRAM

FUNCTION

6.5.5.1 The Nuclear Assessment Department shall function to perform audits of facility activities specified in Specification 6.5.5.2.

AUDITS

6.5.5.2 Audits of facility activities shall be performed by the Nuclear Assessment Department. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety at least once per 6 months.
- d. The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Emergency Plan and implementing procedures at least once per 12 months.
- f. The Security Plan and implementing procedures at least once per 12 months.
- g. The Facility Fire Protection Program and implementing procedures at least once per 12 months.
- h. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- i. The OFFSITE DOSE CALCULATIONAL MANUAL and implementing procedures at least once per 24 months.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

ADMINISTRATIVE CONTROLS

AUDITS (Continued)

- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974, and Regulatory Guide 4.1, Revision 1, April 1975, at least once per 12 months.
- l. Any other area of facility operation considered appropriate by the Manager - Nuclear Assessment Department.

6.5.5.3 Personnel performing the audits shall have access to the plant operating records.

RECORDS

6.5.5.4 Records of audits shall be prepared and retained.

6.5.5.5 Audit reports encompassed by 6.5.5.2 above shall be prepared, approved by the Manager - Nuclear Assessment Department, and forwarded to the Executive Vice President - Power Supply; Senior Vice President - Nuclear Generation; Manager - Brunswick Nuclear Project; General Manager - Brunswick Plant; and others, as appropriate, within 30 days after completion of the audit.

AUTHORITY

6.5.5.6 The Manager - Nuclear Assessment Department shall be responsible for the following:

- a. The administering of the Nuclear Assessment Department Audit Program.
- b. The approval of the individual(s) selected to conduct audits.

PERSONNEL

6.5.5.7 Audit personnel shall be independent of the area audited.

6.5.5.8 Selection of personnel for auditing assignments shall be based on experience or training that establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting audit personnel, consideration shall be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.

6.5.5.9 Qualified outside consultants or other individuals independent from those personnel directly involved in plant operation shall be used to augment the audit teams when necessary.

ADMINISTRATIVE CONTROLS

6.5.6 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM

6.5.6.1 An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.

6.5.6.2 An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the Plant Nuclear Safety Committee - Brunswick Plant and shall be submitted to the Manager - Nuclear Assessment Department and the Manager - Brunswick Nuclear Project.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT SHUTDOWN within two hours.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Manager - Brunswick Nuclear Project and the Manager - Nuclear Assessment Department shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the General Manager - Brunswick Plant. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Manager - Brunswick Nuclear Project, and the Manager - Nuclear Assessment Department within 14 days of the violation.

ADMINISTRATIVE CONTROLS

RECORDS RETENTION (Continued)

- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- l. Records of the service lives of all hydraulic and mechanical snubbers referenced in Section 3.7.5 including the data at which the service life commences and associated installation and maintenance records.
- m. Records of analyses required by the radiological environmental monitoring program.
- n. Records of (1) meetings of the PNSC, (2) meetings of the previous off-site review organization, the Company Nuclear Safety Committee (CNSC), (3) the independent reviews performed by the Nuclear Assessment Department, and (4) the independent reviews performed by the Corporate Quality Assurance Audit Program, Quality Assurance Auditing Unit.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "Control Device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

* Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.