



Carolina Power & Light Company

DEC 29 1983

SERIAL: LAP-83-569

Director of Nuclear Reactor Regulation  
Attention: Mr. D. B. Vassallo, Chief  
Operating Reactors Branch No. 2  
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  
SUPPLEMENTAL REQUEST FOR LICENSE AMENDMENTS  
ADMINISTRATIVE CONTROLS

Dear Mr. Vassallo:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Section 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications (TS) for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. The enclosed revisions supersede those changes provided in our July 28, 1981 submittal and our December 10, 1982 submittal concerning the Administrative Controls section of the Brunswick TS.

DISCUSSION

By letters dated July 28, 1981 and July 10, 1981, CP&L submitted proposed revisions to the TS for Brunswick and H. B. Robinson Unit No. 2 (HBR), respectively, concerning changes to the corporate organization, the plant organization, and the Plant Nuclear Safety Committee (PNSC). Subsequently, the Staff reviewed and approved (with changes) the HBR TS revisions, which were issued by Amendment No. 70. In response to discussions with the Staff regarding the HBR amendment, CP&L reviewed our July 28, 1981 submittal for Brunswick and prepared revisions to that document. Those revisions were submitted to the Staff by our letter dated December 10, 1982.

Following Staff review of the December 10, 1982 submittal, CP&L received a letter from the Staff dated April 21, 1983 that requested additional information concerning the proposed TS revisions. During the preparation of responses to this NRC request, changes were made to the proposed TS section to address the Staff's concerns. As a result of subsequent corporate and plant organizational changes, CP&L found it necessary to again revise the Administrative Controls section to incorporate those organizational changes. In addition, the forthcoming Radiological Effluent Technical Specifications (RETS) also include certain Administrative Controls section requirements that needed to be incorporated in this revised Administrative Controls section submittal.

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Enclosed is a revised Administrative Controls section for the Appendix "A" TS for each Brunswick Unit. These revisions supersede entirely the changes provided by our December 10, 1982 submittal and provide for the following:

- 1) Inclusion of recent corporate and plant organizational changes. A summary of the plant organization is included in the enclosed responses to the April 21, 1983 NRC request for additional information (Enclosure 1).
- 2) Inclusion of additional NUREG-0737 Item I.A.1.3.2 guidance concerning minimum shift crew composition.
- 3) Requirements per NUREG-0737 Item II.K.3.3 for reporting safety/relief valve failures and challenges. Technical Specifications for this item were requested by the NRC in Generic Letter No. 83-02 dated January 10, 1983.
- 4) Requirements per NUREG-0737 Item II.B.3 for establishing, implementing, and maintaining an administrative program concerning post-accident sampling. Technical Specifications for this item were requested by the NRC in Generic Letter No. 83-36 dated November 1, 1983.
- 5) Requirements per NUREG-0737 Item I.A.1.3 concerning the limitation of nuclear power plant staff overtime. Technical Specifications for this item were requested by the NRC in Generic Letter No. 83-02 dated January 10, 1983.
- 6) Administrative Controls requirements necessary to support the technical requirements of the RETS. These RETS Administrative Controls requirements were submitted in our letter dated November 11, 1983 (Serial: LAP-83-510).
- 7) The inclusion of Operating License paragraphs 2.I and 2.J for Brunswick-1 and Operating License paragraphs 2.F and 2.G for Brunswick-2 in the TS. Inclusion of these requirements in the TS and deletion of the above referenced paragraphs from the Operating Licenses provides consistency with the GE/BWR-4 Standard Technical Specifications.

Administrative revisions to the Brunswick Appendix "B" TS are not included in this submittal since that portion of the Appendix "B" TS is being deleted in conjunction with issuance of the RETS for the Brunswick Plant.

#### ADMINISTRATIVE INFORMATION

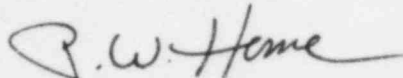
Since this request is a supplement to our July 28, 1981 and December 10, 1982 requests, CP&L has determined that no additional license amendment fee is required. The responses to the Staff's April 21, 1983 request for additional information is provided in Enclosure 1. The revised TS



pages for Brunswick-1 are provided in Enclosure 2, and the revised TS pages for Brunswick-2 are provided in Enclosure 3. These revised TS pages have the changes indicated by vertical lines in the right-hand margins.

Should you have any questions concerning this submittal, please contact our Licensing staff.

Yours very truly,



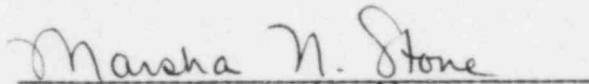
P. W. Howe  
Vice President  
Brunswick Nuclear Project

WRM/ccc (9042WRM)  
Enclosures

cc: Mr. Dayne H. Brown  
Radiation Protection Branch  
Division of Facility Services  
Department of Human Resources

Mr. D. O. Myers (NRC-BSEP)  
Mr. J. P. O'Reilly (NRC-RII)  
Mr. M. Grotenhuis (NRC)

P. W. Howe, 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, contractors, and agents of Carolina Power & Light Company.

  
Notary (Seal)

My commission expires: 3-22-87



ENCLOSURE 1

RESPONSE TO NRC REQUEST FOR  
ADDITIONAL INFORMATION DATED APRIL 21, 1983

BRUNSWICK STEAM ELECTRIC PLANT



NRC Request No. 1:

Page 6-2, Figure 6.2.2 - No basis or evaluation of the revised corporate organization was provided. Additional information is needed which provides an evaluation of the change and explains the differences between the proposed organization and that shown in the H. B. Robinson Technical Specifications.

CP&L Response:

The revised Brunswick organization is similar to the organization for the H. B. Robinson Plant; however, there are several differences in the organizations that are the result of Brunswick being a two unit facility versus H. B. Robinson being a single unit facility. To facilitate the Staff's review of the proposed Brunswick Plant organization, we have enclosed a brief summary of the responsibilities of each of the management level positions shown in TS Figure 6.2.2-1 (see Attachment 1).



## Attachment 1

### SUMMARY OF PLANT MANAGEMENT ORGANIZATION AND RESPONSIBILITIES

#### Vice President - Brunswick Nuclear Project

The Vice President - Brunswick Nuclear Project is responsible for all phases of site management, including site construction activities, site engineering, planning & scheduling, and plant operation. He is supported in these responsibilities by the plant General Manager, Manager - Brunswick Nuclear Project - Engineering & Construction, and the Director - Planning & Scheduling. The Vice President - Brunswick Nuclear Project reports to the Executive Vice President - Power Supply, Engineering & Construction.

#### General Manager - Brunswick Plant

The plant General Manager is responsible for all phases of plant management, including operation, maintenance, and technical supervision. He is responsible for adherence to all requirements of the Operating License and Technical Specifications. He is supported in these responsibilities by the Manager - Plant Operations, Manager - Technical & Administrative Support, Director - Regulatory Compliance, and the Assistant to the General Manager. In the absence of the General Manager, either the Manager - Plant Operations or the Manager - Technical & Administrative Support will assume his authorities and responsibilities. The General Manager reports directly to the Vice President - Brunswick Nuclear Project.

#### Manager - Plant Operations

The Manager - Plant Operations is responsible for the operation and direct maintenance support of the two units, including refueling operations. In addition, he is responsible for the chemistry, radiation protection, and environmental monitoring programs at the plant. His responsibilities are accomplished through those reporting to him, including the Manager - Operations, the Manager - Maintenance, and the Manager - Environmental & Radiation Control. The Manager - Plant Operations reports to the General Manager and may assume the responsibilities and authorities of the plant General Manager in his absence.

#### Manager - Operations

The Manager - Operations is responsible for coordinating and overseeing the duties of the Operations Superintendent. He is responsible for orderly, safe operations, turnovers, compliance with operating instructions, and adherence to all requirements of the appropriate items of the Operating License and Technical Specifications. He is supported in these responsibilities by the Operations Superintendent.



### Operations Superintendent

The Operations Superintendent is responsible for safe operation of the two units, adherence to all requirements of the appropriate items of the Operating License and Technical Specifications, ensuring operator training and retraining is provided, and ensuring that operating procedures are followed. His responsibilities are accomplished through the various licensed operations personnel on each shift. The Operations Superintendent shall hold a Senior Operator's License. The Operations Superintendent reports to the Manager - Operations.

### Shift Operations Supervisor

Each Shift Operating Supervisor will be responsible for supervising plant operations and implementing the radiation protection program during his shift. He is responsible for adherence to all requirements of the appropriate items of the Operating License and Technical Specifications. The Shift Operating Supervisor is responsible for all personnel assigned to each shift, including operators, mechanics, electricians, E&RC technicians, and I&C technicians. His responsibilities are accomplished through the various foremen and lead personnel assigned to each shift. The Shift Operating Supervisor shall hold a Senior Operator's License. The Shift Operating Supervisor reports to the Operations Superintendent.

### Manager - Maintenance

The Manager - Maintenance is responsible for ensuring that equipment, instrumentation, controls, and mechanical and electrical systems are maintained at optimum dependability, safety, and operating efficiency to comply with plant Technical Specifications, security, radiation control, and regulatory requirements. He accomplishes this by planning, directing, and controlling a highly skilled staff; inspecting maintenance work; providing effective maintenance procedures and standards; and developing improvements in the Prevention and Corrective Maintenance Programs. He is assisted in these functions by Maintenance Supervisors and Engineers. The Manager - Maintenance reports to the Manager - Plant Operations.

### Manager - Environmental & Radiation Control

The Manager - Environmental & Radiation Control is responsible for providing the environmental & radiation control support necessary for the operation of the plant within plant Technical Specifications and applicable state and federal regulations. His responsibilities are accomplished through a staff including the Environmental & Chemistry Supervisor, the Radiation Control Supervisor, and specialists. The Manager - Environmental & Radiation Control reports to the Manager - Plant Operations.

### Manager - Technical Support

The Manager - Technical Support is responsible for providing technical support for the efficient operation of the Brunswick plant in a manner contributing to high plant efficiency, reliability, and availability. His responsibilities are accomplished through his staff of Engineering personnel. The Manager - Technical Support reports to the Manager - Technical & Administrative Support.



#### Director - Planning & Scheduling

The Director - Planning & Scheduling is responsible for planning, scheduling, and coordinating long and short-term outages; backfit and modification work to provide the lowest downtime and/or least interference with plant operations and to maintain radiation exposures ALARA. He is supported in these activities by a staff of engineers. The Director - Planning & Scheduling reports to the Vice President - Brunswick Nuclear Project.

#### Director - Regulatory Compliance

The Director - Regulatory Compliance is responsible for providing regulatory support for plant efforts to comply with regulatory (NRC), NSAC, and Corporate Nuclear Safety requirements as well as INPO guidelines. This is accomplished by coordinating and following on-site NRC, CNS, QA/QC, INPO, and NSAC activities, inspections, commitments, and responses and by resolution of concerns. He ensures that commitments are met, responses which accurately depict the plant's position are submitted, reportable occurrences are detected and reported, documentation is maintained, and support for Technical Specifications and/or revision is provided. The Director - Regulatory Compliance reports to the plant General Manager.

#### Manager - Technical & Administrative Support

The Manager - Technical & Administrative Support is responsible for providing technical & administrative support necessary for efficient plant operations in the areas of Engineering, Cost Control, plant Office Services, Document Control, Emergency Preparedness and plant Security. His responsibilities are accomplished through his staff, including the Manager - Technical Support and Director - Administrative Support. The Manager - Technical & Administrative Support reports to the plant General Manager.

#### Director - Administrative Support

The Director - Administrative Support is responsible for providing Administrative support necessary for efficient plant operations in the areas of Cost Control, Emergency Preparedness, Security, Document Control, Office Services, Materials, and Industrial Engineering. He is supported in these areas by the Administrative Supervisor, Materials Control Supervisor, Document Control Supervisor, Security Specialist, and Project Engineer - Industrial Engineering. The Director, Administrative Support reports to the Manager - Technical and Administrative Support.

#### Manager - Engineering & Construction

The Manager - Engineering & Construction is responsible for site project engineering and construction activities. He is supported in these areas by the Resident Engineer - Brunswick Engineering Support Unit, and Brunswick Project Construction Manager. The Manager - Engineering & Construction reports to the Vice President - Brunswick Nuclear Project.



NRC Request No. 2:

Page 6-3, Figure 6.2.2-1 - The reorganized plant organization shows the Manager, Environmental & Radiation Control reporting to the Manager Plant Operations. This reporting chain appears inconsistent with the NRC position of separation of radiation protection from operating pressures. Based on the Criteria of Regulatory Guide 8.8, Section C.1.b(3) and Regulatory Guide 8.10, Section C.1.3, the Brunswick Radiation Protection Manager (RPM) should have sufficient authority to enforce safe plant operations and be independent of operating, maintenance and technical support functions. This requires the ability to communicate promptly with an appropriate level of management about radiation safety matters. It is our position that the RPM should have direct lines of communications to the Plant's General Manager (either by directly reporting to him or by provision for bypassing the Manager, Plant Operations) to report on radiation safety matters. Your facility organization in Figure 6.2.2.1 should be revised to reflect this position.

CP&L Response:

The positions of Manager - Environmental & Radiation Control, Manager - Maintenance, and Manager - Operations report to the Manager - Plant Operations. The objective of having these three disciplines work as an integral unit is to develop a close coordination of operations and maintenance activities with a constant emphasis on the Health Physics and ALARA programs.

As indicated in the enclosed proposed Technical Specifications, Section 6, Figures 6.2.2-1 and 6.2.2-2, the Manager - Environmental & Radiation Control has direct and open lines of communication with the plant General Manager, Manager - Corporate Health Physics, and the Manager - Radiological & Chemical Support for matters regarding the radiological health and safety of employees and the public. The Manager - Environmental & Radiation Control is charged with the responsibility and is encouraged to use these lines of communications to ensure the company policy for Health Physics and ALARA are implemented.

Carolina Power & Light Company believes that the above organization meets the intent of the NRC's guidance, since the Manager - Environmental & Radiation Control does not report to the Manager - Operations or Manager - Maintenance but reports to the next level of management, the Manager - Plant Operations. This organization includes the additional check and balance of encouraging the Manager - Environmental & Radiation Control to communicate directly to the plant General Manager and Corporate Managers in Health Physics matters and unresolved concerns.



NRC Request No. 3:

In response to Generic Letter 82-12, please submit a proposed change to Section 6.2 in respect to the policy on overtime.

CP&L Response:

Enclosed are proposed Technical Specification (TS) revisions to address the NRC policy on limiting shift overtime in accordance with NRC Generic Letter No. 82-12 dated June 15, 1982 and NRC Generic Letter No. 83-02 dated January 10, 1983. The proposed TS revision provided herein (refer to proposed TS 6.2.2.g) meets the intent of the Staff TS guidance in Generic Letter 83-02 (NUREG-0737 Technical Specifications).



NRC Request No. 4:

Page 6-8, Section 6.5.1 - This item should be revised to include provisions for assuring interdisciplinary review, as necessary, and to limit authority for approval of reviewed items to predesignated high level managers.

CP&L Response:

The NRC concerns discussed above were raised during review of the H. B. Robinson (HBR) Administrative Controls Technical Specifications (TS) revisions and are addressed on page 8 of the Safety Evaluation Report for HBR Amendment No. 70 (copy attached). During discussions with the Staff concerning the HBR TS request, CP&L proposed revisions to the request to address assurance of interdisciplinary review and limitation of approval authority for reviewed items (refer to HBR Specification 6.5.1.1.4, copy attached). The HBR revisions addressing the interdisciplinary review concern have already been incorporated in proposed Specifications 6.5.1.4, 6.5.1.5, and 6.5.2.2 for Brunswick. The revisions addressing the predesignated approval concern are provided in proposed Specifications 6.5.2.4 and 6.5.2.6.



However, we require that:

1. the qualifications of the personnel performing the review shall, as a minimum, meet the qualification requirements for professional-technical personnel specified by Section 4.4 of ANSI N16.1-1971
2. the participants shall collectively possess the background and qualifications in the subject matter under review to provide a comprehensive, inter-disciplinary review
3. the Plant General Manager shall be responsible to review and approve the reports and recommendations developed by the reviewers and forward them to the independent review group. We recognize that in order to fulfill this responsibility, the Plant General Manager may delegate some of these activities to other specific appropriate plant staff managers. This delegation must be in writing and specific to the particular review activity being performed.

We found that the proposed changes to the Robinson TS, as submitted by the licensee in its July 10, 1981 letter to the NRC did not adequately address all of these three requirements.

Requirement 1

By telephone communication the licensee subsequently agreed to modify its new Section 6.5.1.5.1 to state that individuals designated for the two-party safety reviews shall have a Bachelor of Science in engineering or related field or equivalent and two years related experience. This requirement meets



6.5.1.1.3 Prior to approval, a second safety review shall be performed on all procedures, tests, or experiments that affect nuclear safety. This review shall be performed by an individual other than the individual who was the original preparer.

6.5.1.1.4 Following the two-party review, procedures, tests, and experiments and permanent changes thereto (other than editorial or typographical) which have been determined neither to involve an unreviewed safety question as defined in 10CFR50.59(a)(2), nor a change to the Technical Specifications, shall be approved prior to implementation by one of the following:

- a. Plant General Manager, or designated alternate, or
- b. The Manager of the functional area affected by the procedures tests, and experiments and permanent changes thereto as previously designated by the Plant General Manager.

The individual approving the procedure, test, or experiment or change thereto shall be other than those who performed the required reviews.

The Plant General Manager or other designated manager approving the review activities of the two-party review shall assure that the reviewers collectively possess the background and qualifications in all of the disciplines necessary and important to the specific review. To assure that the individuals selected for the two-party review are qualified and have the background necessary, the Plant General Manager shall approve and maintain a list of qualified persons. Included in this list will be individuals in addition to the first and second party reviewer whose expertise may be necessary during the review to assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review.



The list will include the disciplines for which each person is qualified.

6.5.1.1.5 Temporary changes to procedures, tests, or experiments may be approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator License if such change does not change the intent of the original procedure, test, or experiment. Temporary changes shall be documented and, within 21 days of receiving temporary approval, be reviewed in accordance with specification 6.5.1.1.2, 6.5.1.1.3 and 6.5.1.1.4 and incorporated as a permanent change or deleted.

6.5.1.1.6 Those procedures, tests, or experiments and changes thereto that constitute an unreviewed safety question, or involve a change to Technical Specifications shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such procedures, tests, or experiments and changes shall be reviewed by the Corporate Nuclear Safety Section prior to implementation.

6.5.1.1.7 Procedures, tests, or experiments, which constitute a change to the FSAR shall also be reviewed by the Corporate Nuclear Safety Section. These reviews may be conducted after plant Management approval, and implementation may proceed prior to completion of review as provided for by 10CFR50.59(a)(1).

6.5.1.2 Modifications

6.5.1.2.1 A safety analysis shall be prepared for all modifications that affect nuclear safety. The analysis shall include a written determination of whether or not the modification is a change in the facility as described in the FSAR, involves a change to the Technical Specification, or constitutes an unreviewed safety question as defined in 10CFR50.59(a)(2).

This analysis constitutes a first party safety review and may be accomplished by the individual who prepared the modification.



NRC Request No. 5:

Page 6-8, Section 6.5.2 - The Safety Review and Control function should contain provisions for the independent review of the primary items; not just for the review of the safety evaluations of those items.

CP&L Response:

Enclosed are proposed Technical Specification (TS) revisions that contain provisions for the independent review of both the primary item and the associated safety evaluation (refer to proposed TS 6.5.2.2).



NRC Request No. 6:

Page 6-12, Section 6.5.3.7 - The quorum statement should be changed to require a majority of the PNSC; i.e., the Chairman and four members.

CP&L Response:

Enclosed are revised Technical Specifications (refer to TS 6.5.3.7) which require a majority of Plant Nuclear Safety Committee (PNSC) members to be present in order to have a quorum for a meeting. The required majority has also been revised to reflect the addition of new individuals as PNSC members.



NRC Request No. 7:

Page 6-12, Section 6.5.3.8.a. b. and c. - The wording needs to be clarified. If it means the PNSC reviews only unreviewed safety questions, it is unacceptable; if the meaning is otherwise, then it needs to be clarified to provide for more explicit PNSC overview of the Safety Review and Control function.

CP&L Response:

By letter dated July 10, 1981 (Serial No. NO-81-1193), Carolina Power & Light Company (CP&L) proposed revisions to the H. B. Robinson (HBR) Administrative Controls Technical Specifications (TS) to address organizational changes and revised methods for accomplishing the safety review and control function. The NRC Staff concern discussed above was raised during review of the HBR Administrative Controls TS revision and is addressed on pages 4, 6, 7, 8, 9, 10, and 11 of the Safety Evaluation Report for HBR Amendment No. 70 (copy attached). During discussions with the Staff concerning the HBR TS request, CP&L proposed revisions to the HBR request to address three NRC stipulations. This modified HBR request is what CP&L used as the NRC-approved model on which to base the Brunswick TS revisions.

Among the requirements, HBR TS 6.5.1.6.6.d requires the reviews of Specifications 6.5.1.1.6, 6.5.1.2.4, 6.5.1.3.1, and 6.5.1.4.1 to be performed by the Plant Nuclear Safety Committee (PNSC).

- \* HBR TS 6.5.1.1.6 requires the PNSC to review "those procedures, tests or experiments and changes thereto that constitute an unreviewed safety question or involve a change to Technical Specifications."
- \* HBR TS 6.5.1.2.4 requires the PNSC to review "modifications that are determined to either constitute an unreviewed safety question, as defined in 10 CFR 50.59(a)(2), or a change to the Technical Specifications."
- \* HBR TS 6.5.1.3.1 requires the PNSC to review "each proposed Technical Specification or Operating Licensing change."
- \* HBR TS 6.5.1.4.1 requires the PNSC to review reports evaluating all violations of Technical Specifications.

Listed below are TS references for the HBR requirements discussed above and the corresponding proposed Brunswick TS references that fulfill the same requirement:

<u>H. B. Robinson</u>	<u>Brunswick</u>
TS 6.5.1.1.6	TS 6.5.3.8.a
	TS 6.5.3.8.b
TS 6.5.1.2.4	TS 6.5.3.8.c
TS 6.5.1.3.1	TS 6.5.3.8.d
TS 6.5.1.4.1	TS 6.5.3.8.e



#### 6.5 Review and Audit

The licensee proposed to eliminate the current TS requirements for review of certain activities by the Plant Nuclear Safety Committee (PNSC). It also proposes that some, but not all, of the review requirements that are eliminated from the required list of PNSC reviews will be assigned to other plant staff personnel. In order to specify these revised review requirements, the licensee proposed to extensively modify and restructure TS Section 6.5, Review and Audit. It also proposed to eliminate TS Section 6.8, Procedures and to provide all requirements concerning procedures in Section 6.5. Whereas Section 6.5.1 of the current TS describes the Plant Nuclear Safety Committee (PNSC) and lists 10 specific items (items 6.5.1.7a-j) of review responsibility, the proposed change reorganizes Section 6.5 around and to provide specific and more detailed requirements related to the preparation, review and approval of the following activities:

- Procedures, Tests and Experiments (New Section 6.5.1.1)
- Modifications (New Section 6.5.1.2)
- Technical Specification and License Changes (New Section 6.5.1.3)
- Review of Technical Specification Violations (New Section 6.5.1.4)

#### 6.5.1 Plant Nuclear Safety Committee (PNSC)

The licensee proposes to place this PNSC information in new Section 6.5.1.6.



6.5.1.4 Consultants - The licensee proposes to delete the information in this section which states consultants shall be utilized as determined by the PNSC Chairman. We do not believe this statement is necessary or needed and find its deletion acceptable.

6.5.1.6 Quorum - The current quorum required by this section is four members. The licensee proposes to place this quorum information in new Section 6.5.1.6.5 and to retain this same quorum of four members. We note that for most plants the current quorum requirement is five members. However, it is not our practice to require that licensees modify their TS to meet the latest, most recently developed, or more stringent requirements each time they request a TS change. Since the current quorum requirement for Robinson is four members, we accept this same quorum in the revised TS.

6.5.1.7 Responsibilities - The licensee has proposed in new Section 6.5.1.1 on Procedures, Tests and Experiments and 6.5.1.2 on Modifications to specify a new requirement that a two-party review be performed prior to approval of



procedures, tests, experiments and plant modifications. This two-party review will provide a written safety analysis including a determination of whether or not the activity involves a change in the facility as described in the FSAR, a change to the TS or constitutes an unreviewed safety question."

The current TS Sections 6.5.1.7a, b and d specify that the PNSC be responsible for review of all proposed procedures, tests, experiments and plant modifications that affect nuclear safety. The licensee has proposed that procedures, tests, experiments and plant modifications that do not constitute an unreviewed safety question need not be reviewed by the PNSC. It proposed instead to require only the two-party review as discussed above and require approval prior to implementation by (1) the Plant General Manager or the Manager of the functional areas affected in the case of procedures, tests and experiments and by (2) the Plant General Manager or the Manager of Technical Support in the case of plant modifications.

It has also proposed that in the absence of any of these three, an alternate designated in writing by the Plant General Manager could approve these activities prior to implementation.

It is acceptable to us to have all of the currently required onsite review and investigative functions handled by a single committee (PNSC) as required by the current TS or to have only parts of the onsite review and investigative functions performed by a committee and the remainder performed by plant organizational units or personnel as is being proposed by the licensee.



However, we require that:

1. the qualifications of the personnel performing the review shall, as a minimum, meet the qualification requirements for professional-technical personnel specified by Section 4.4 of ANSI N18.1-1971
2. the participants shall collectively possess the background and qualifications in the subject matter under review to provide a comprehensive, inter-disciplinary review
3. the Plant General Manager shall be responsible to review and approve the reports and recommendations developed by the reviewers and forward them to the independent review group. We recognize that in order to fulfill this responsibility, the Plant General Manager may delegate some of these activities to other specific appropriate plant staff managers. This delegation must be in writing and specific to the particular review activity being performed.

We found that the proposed changes to the Robinson TS, as submitted by the licensee in its July 10, 1981 letter to the NRC did not adequately address all of these three requirements.

Requirement 1

By telephone communication the licensee subsequently agreed to modify its new Section 6.5.1.5.1 to state that individuals designated for the two-party safety reviews shall have a Bachelor of Science in engineering or related field or equivalent and two years related experience. This requirement meets



or exceeds the minimum qualifications specified in Section 4.4 of ANSI-N18.1-1971 and therefore is acceptable. The members of the PNSC are plant managers who are required to meet the qualifications for their particular management position as specified by Sections 4.2.1, 4.2.2, 4.2.3 and 4.2.4 of ANSI-N18.1-1971 and are therefore acceptable.

We also found that the proposed specification did not directly address the minimum qualification requirements for alternates to the PNSC. The licensee has informed us orally that it tries to appoint alternates who meet the qualification requirements for the management position held by the member for whom they serve. However, the licensee subsequently agreed to add the following statement to the licensee's proposed new Section 6.5.1.6.3:

"Alternates shall as a minimum meet the qualifications specified for professional-technical personnel in Section 4.4 of ANSI-N18.1-1971."

We find this addition acceptable.

#### Requirement 2

The proposed sections on two-party review do not address the need to assure that reviewers collectively possess the qualifications in the subject matter under review to provide a comprehensive interdisciplinary review. However, during subsequent telephone communications the licensee agreed to add the following statement to the proposed new Sections 6.5.1.1.4 and 6.5.1.2.3:



The Plant General Manager or other designated manager approving the review activities of the two-party review shall assure that the reviewers collectively possess the background and qualifications in all of the disciplines necessary and important to the specific review. To assure that the individuals selected for the two-party review are qualified and have the background necessary, the Plant General Manager shall approve and maintain a list of qualified persons. Included in this list will be individuals in addition to the first and second party reviewers whose expertise may be necessary during the review to assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review. The list will include the disciplines for which each person is qualified.

We conclude this addition acceptable.

Requirement 3

We find the licensee's proposal in new Section 6.5.1.4b that procedures, tests and experiments be approved by the "manager of the functional area affected by the procedures, tests, or experiments" appears to leave it up to the manager to decide if he or she is the approval authority for the case in point. We believe that the subject matter that is to be approved by each manager should be previously specified by the Plant Manager. Therefore, we require that the following statement be added to new Section 6.5.1.1.4b: "as previously designated by the Plant General Manager." We have added this statement in Attachment 1.

The licensee, by telephone communication, has subsequently proposed to modify new Sections 6.5.1.1.4a and 6.5.1.2.3a to add that the designated alternate to the Plant General Manager may approve two-party reviews. It has also agreed to delete new Sections 6.5.1.4c and 6.5.1.2.3c concerning appointment of alternates. We conclude that this change is acceptable.



The current TS Section 6.5.1.7e specified that the PNSC is responsible for investigation of all violations of TSs. The licensee proposed to delete both (1) the requirement that all violations of TSs be investigated and (2) the requirement that the PNSC is responsible for the investigation of TS violations. The licensee proposed instead, in new Section 6.5.1.4.1, to require investigation of only those TS violations that (1) require 24-hour reports to the NRC or (2) involve safety limit violations. It also proposed that reports of these investigations be approved by the General Manager or his designee. It did not state who performs the investigation or prepares the reports.

Deletion of the requirement for investigation of all TS violations is not acceptable. We require that all TS violations be investigated and that a report covering the evaluation and recommendations to prevent recurrence be prepared and submitted to the Manager - Corporate Nuclear Safety (independent review group) and to the Vice President - Nuclear Operations.

The licensee has subsequently informed us, by telephone communication, that it is (1) modifying its proposed Sections 6.5.1.4.1 and 6.5.1.6.6 to require that the PNSC perform a review of all violations to TSs. With these modifications we conclude that the proposed TSs require appropriate review of all TS violations and are acceptable.

The current TS Section 6.5.1.7f specifies that the PNSC is responsible for the review of facility operations to detect potential safety hazards. The licensee proposed to delete the requirement for review / facility operations



NRC Request No. 8:

Page 6-14, Section 6.5.4.4 - The qualification requirements for the independent safety review program reviewers should include three years experience with operation and/or design of nuclear power plants.

CP&L Response:

The NRC concern discussed above was evaluated during review of the H. B. Robinson (HBR) Administrative Controls Technical Specifications (TS) revisions and is addressed on page 8 of the Safety Evaluation Report for HBR Amendment No. 70 (copy attached). During telephone discussions with the Staff concerning the HBR TS request, CP&L agreed to modify the proposed HBR TS 6.5.1.5.1 to require that independent safety reviewers have two years of related experience.

The proposed TS 6.5.1.2 for the Brunswick Plant requires that independent safety reviewers have "an academic degree in an engineering or related field or equivalent and two years related experience." This requirement meets or exceeds the minimum qualifications specified in Section 4.4 of ANSI-N18.1-1971.



However, we require that:

1. the qualifications of the personnel performing the review shall, as a minimum, meet the qualification requirements for professional-technical personnel specified by Section 4.4 of ANSI N18.1-1971
2. the participants shall collectively possess the background and qualifications in the subject matter under review to provide a comprehensive, inter-disciplinary review
3. the Plant General Manager shall be responsible to review and approve the reports and recommendations developed by the reviewers and forward them to the independent review group. We recognize that in order to fulfill this responsibility, the Plant General Manager may delegate some of these activities to other specific appropriate plant staff managers. This delegation must be in writing and specific to the particular review activity being performed.

We found that the proposed changes to the Robinson TS, as submitted by the licensee in its July 10, 1981 letter to the NRC did not adequately address all of these three requirements.

Requirement 1

By telephone communication the licensee subsequently agreed to modify its new Section 6.5.1.5.1 to state that individuals designated for the two-party safety reviews shall have a Bachelor of Science in engineering or related field or equivalent and two years related experience. This requirement meets



or exceeds the minimum qualifications specified in Section 4.4 of ANSI-N18.1-1971 and therefore is acceptable. The members of the PNSC are plant managers who are required to meet the qualifications for their particular management position as specified by Sections 4.2.1, 4.2.2, 4.2.3 and 4.2.4 of ANSI-N18.1-1971 and are therefore acceptable.

We also found that the proposed specification did not directly address the minimum qualification requirements for alternates to the PNSC. The licensee has informed us orally that it tries to appoint alternates who meet the qualification requirements for the management position held by the member for whom they serve. However, the licensee subsequently agreed to add the following statement to the licensee's proposed new Section 6.5.1.6.3:

"Alternates shall as a minimum meet the qualifications specified for professional-technical personnel in Section 4.4 of ANSI-N18.1-1971."

We find this addition acceptable.

#### Requirement 2

The proposed sections on two-party review do not address the need to assure that reviewers collectively possess the qualifications in the subject matter under review to provide a comprehensive interdisciplinary review. However, during subsequent telephone communications the licensee agreed to add the following statement to the proposed new Sections 6.5.1.1.4 and 6.5.1.2.3:



NRC Request No 9:

Page 6-15, Section 6.5.4.9 - The review responsibilities of the Corporate Nuclear Safety Section should be revised to include those items described in Section 4.3 of ANSI-N18.2, 1976 or Section 6.5.2 of the Standard Technical Specifications.

CP&L Response:

Enclosed are proposed Technical Specifications (TS) revisions which revise the review responsibilities of the Corporate Nuclear Safety Section. Specifically, TS 6.5.4.9 has been revised to include all the review items described in Section 4.3 of ANSI-N18.7, 1976. This revised TS 6.5.4.9 is also consistent with the list of review items provided in Standard Technical Specification 6.5.2.1.



NRC Request No. 10:

Page 6-17, Section 6.5.5.2 - The audit frequency for the Security Plan and Fire Protection Program should be changed to once per 12 months to be consistent with NRC policy.

CP&L Response:

Enclosed are proposed Technical Specification (TS) revisions to address the audit frequency for the Security Plan and the Fire Protection Program. The proposed TS revision provided herein (refer to TS 6.5.5.2.f and 6.5.5.2.g) are consistent with the Staff guidance provided in Generic Letter 82-17 dated October 1, 1982 and Generic Letter 82-23 dated October 30, 1982.