


CAROLINA POWER & LIGHT COMPANY  
BRUNSWICK STEAM ELECTRIC PLANT

UNIT 0

PROCEDURE TYPE: REGULATORY COMPLIANCE INSTRUCTION (RCI)  
PROCEDURE NUMBER: 02.2  
PROCEDURE TITLE: OPERATING LICENSE AND TECHNICAL SPECIFICATION  
AMENDMENT ISSUANCE AND IMPLEMENTATION

REVISION 3

APPROVED BY:

  
General Manager/  
Director - Regulatory Compliance

4/33/86  
Date

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## 1.0 INTRODUCTION

### 1.1 Purpose

This instruction provides the method for issuance and implementation of operating license, including technical specification, amendments to appropriate BSEP personnel following receipt from the Nuclear Regulatory Commission (NRC).

### 1.2 References

- 1.2.1 RCI-02.1, Request for Operating License Changes
- 1.2.2 10CFR50.36, Technical Specifications
- 1.2.3 BSEP Unit Nos. 1 and 2, Operating Licenses DPR-71 and I-R-62, respectively including Technical Specifications
- 1.2.4 RCI-05.2, Regulatory Compliance Action Item Assignment and Resolution

### 1.3 Responsibility

- 1.3.1 The Director - Regulatory Compliance has the responsibility for ensuring that amendments to the BSEP Unit Nos. 1 and 2 operating licenses are implemented in a timely manner following issuance by the NRC.
- 1.3.2 Unit/subunit managers/directors are responsible for the timely implementation of operating license amendments which affect their assigned work activities.

### 1.4 Applicability

This instruction shall apply to technical specification changes and license changes issued by the NRC.

## 2.0 INSTRUCTION

- 2.1 Upon receipt of an operating license change or a technical specification amendment from the NRC (Office of Nuclear Reactor Regulation), the Regulatory Compliance Unit shall perform the following:

- 2.1.1 Compare the operating license amendment to the corresponding proposed revision, if applicable, as submitted in accordance with RCI-02.1 (or AI-09.1 if submitted prior to approval of revision 0 of this instruction).

- 2.1.2 If differences exist between the issued amendment and that which was proposed by CP&L, the affected groups shall be notified of the differences.

NOTE: Regardless of the severity of the conflict, the requirements of the operating license must be followed. If the conflict is adverse in nature such that plant operation, safety, and/or reliability may be jeopardized, Regulatory Compliance shall be so informed in order that an emergency operating license change may be initiated. However, operation of the plant in accordance with the license shall be maintained until specific relief is granted by the NRC unless the provisions of 10CFR50.54(X) are used.

- 2.1.3 Ensure Corporate Nuclear Safety review of the proposed operating license change has been accomplished. If not, CNS should be contacted and their review completed prior to implementation of the nonconservative implementation requirements.

- 2.1.4 Determine the status of FACTS action items developed in RCI-02.1 or per special memorandum requesting an up-front review of technical specification change submittals processed per AI-09.1. Any open items shall be processed as follows:

- 2.1.4.1 Plant modifications. If full operability has not been declared on the involved plant modification, Operations shall be contacted and appropriate LCOs initiated.
- 2.1.4.2 Conservative procedure revisions. Verify that conservative procedure revisions have been implemented prior to the BSEP receipt of the license amendment. Open conservative procedure revisions shall be rescheduled, as necessary, with a completion date established to be within ten days from the BSEP receipt of the license amendment. Extension of the completion date for conservative procedure changes beyond this ten-day period shall be at the discretion of the Director - Regulatory Compliance or his designee.
- 2.1.4.3 Nonconservative procedure revisions. Assign FACTS action items per RCI-05.2 to the nonconservative procedure revisions identified in accordance with RCI-02.1. These nonconservative action items shall have completion dates no later than ten days from the BSEP receipt of the license amendment or the next scheduled performance of the applicable surveillance, whichever is greater.

Extension of these completion dates may be granted at the discretion of the Director - Regulatory Compliance.

2.1.5 Close any existing technical specification interpretations addressed by the operating license amendment.

2.2 The Director - Regulatory compliance shall be informed of the completion of actions specified by Step 2.1 and provided with a status of the open FACTS action items. This FACTS status shall include, but not be limited to, a listing of the procedure numbers, FACTS commitment numbers, and Technical Specification section reference.

2.3 The FACTS status shall also be used to revise the STST data base, as necessary, and ensure proper scheduling of surveillance requirements. The revisions to the STST shall address, but not necessarily be limited to, new or additional surveillance requirements for which a procedure has not been written. In these cases, the procedure number in the STST data base will be replaced with the FACTS commitment number.

2.4 The Technical Specification change file shall be forwarded to Document Control containing the documentation specified in RCI-02.1 and the status of open FACTS action items. The FACTS file will provide documentation of the implementation requirement closure.