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SERIAL: BSEP 96-0040
10 CFR 50.54(q)

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U. S. Nuclear Regulatory Commission
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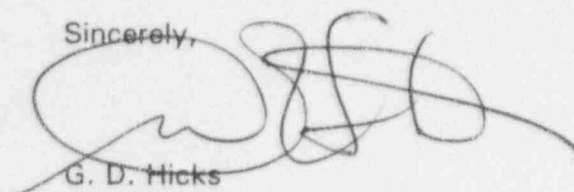
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REVISION TO PLANT EMERGENCY PROCEDURES

Gentlemen:

In accordance with 10 CFR 50.54(q) and 10 CFR 50, Appendix E, Carolina Power & Light Company (CP&L) hereby submits revisions to Brunswick Steam Electric Plant, Units 1 and 2, Plant Emergency Procedures and Revision 43 of the Radiological Emergency Response Plan. CP&L has evaluated these changes in accordance with 10 CFR 50.54(q) and determined that the changes do not decrease the effectiveness of the Brunswick Plant Emergency Plan. A list of the revised procedures is provided in Enclosure 1. A summary of the changes is provided in Enclosure 2. Enclosure 3 contains copies of the revised Plant Emergency Procedures.

Please refer any questions regarding this letter to Ms. C. K. Cashwell at (910) 457-2673.

Sincerely,



G. D. Hicks
Manager - Regulatory Affairs
Brunswick Nuclear Plant

CKC/kah

Enclosures

cc: Mr. S. D. Ebnetter, Regional Administrator, Region II (2 copies)
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector
Mr. D. C. Trimble, Jr., NRR Senior Project Manager - Brunswick Units 1 and 2
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

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ENCLOSURE 1
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324
LICENSE NOS. DPR-71 & DPR-62

REVISION TO PLANT EMERGENCY PROCEDURES

LISTING OF REVISED PLANT EMERGENCY PROCEDURES

<u>PROCEDURE</u>	<u>REVISION</u>	<u>TITLE</u>
OERP	43	Radiological Emergency Response Plan
PEP-02.1	38	Initial Emergency Actions
PEP-04.2	11	Emergency Facilities and Equipment

ENCLOSURE 2
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
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Revision Summary

A. Radiological Emergency Response Plan

Revision 43 of the Radiological Emergency Response Plan consists of the following general changes:

- Corrected references to "Shift Supervisor" by replacing with "Shift Superintendent".
- Corrected references to the "Manager - Emergency Preparedness" by replacing with "Supervisor - Emergency Preparedness".
- Replacement of the High Frequency Radio System with a Satellite Telephone Communications System
- Replaced all references to "Southern Bell" with "Bell South".
- Updated the dose assessment source term table (Appendix F)
- Incorporated EAL revisions made in OPEP-02.1 Revision 38
- Clerical, Editorial, and Grammatical Corrections

Following is a breakdown of the changes identified in the Revision Summary..

E-Plan Changes

1. Step 1.0
 - a. Item 5, second paragraph - changed "Manager" to "Supervisor".
2. Step 1.3.1.2
 - a. Paragraph 1, fourth sentence - changed "Supervisor" to "Superintendent".
3. Step 4.2.2.1
 - a. Paragraph 2, Item 1 - changed "Supervisor" to "Superintendent".
4. Step 6.0
 - a. Paragraph 2 - changed "Manager" to "Supervisor".
5. Step 6.1.2.2
 - a. Paragraph 1, fifth sentence - changed "...expanded to involve the federal response organizations..." to read "...expanded to allow involvement of federal response organizations...".
6. Appendix A
 - a. Step A.1.4, last sentence - deleted "HF single side band radio provides direct communication with NRC Region 2 Headquarters."
 - b. Step A.1.8 - new step, "Satellite Telephone Communications" describing the new communications system.
 - c. Step A.2.2 - changed all references to "Southern Bell" to "Bell South".
7. Appendix F
 - a. Table 3 - Brunswick Plant Dose Assessment Source Terms table replaced with updated version.
8. List of Effective Pages
 - a. Revised to reflect EAL-1 and EAL-2 revision change. Specific changes included as part of revision 38 to OPEP-02.1.

B. OPEP-02.1

Revision 38 to OPEP-02.1 consists of the following general changes:

- All references to "Shift Supervisor" have been changed to "Shift Superintendent".
 - Deletion of reference to deleted procedure OBSP-044.
 - Addition of a note to trigger notification of the Maintenance Rule Engineer for applicable EAL entries.
 - Added step to insure appropriate medical personnel are notified in medical events.
 - Revised Emergency Action Levels to incorporate changes allowed by the NRC's Branch Position on Acceptable Deviations to Appendix 1 to NUREG-0654/FEMA-REP-1.
 - Revised and reformatted turnover checklists for compatibility with associated checklists and added guidelines for their use.
 - Editorial and clerical changes.
1. Step 1.0
 - a. Changed "Supervisor" to "Superintendent".
 2. Step 2.0
 - a. Deleted reference to OBSP-44 (item 2.14) and renumbered subsequent references.
 3. Step 4.2
 - a. Deleted "Shift" from the definition of SRO.
 4. Step 5.1
 - a. Changed "Supervisor" to "Superintendent".
 5. Step 5.2
 - a. Revised step to change "The..." to "A..." and changed "Supervisor" to "Superintendent".
 6. Step 6.2.2
 - a. Revised step from "Implement PEP-03.8.2, Personnel Accountability and Evacuation and direct evacuees to report to their Primary Personnel Assembly Location and, direct work group supervisors to inform the Shift Supervisor of any personnel not accounted for within 30 minutes." to "Implement OPEP-03.8.2, Personnel Accountability and Evacuation (Building or Area Evacuation Section); direct affected

personnel to report to their work group supervisor and direct work group supervisors to inform the Shift Superintendent of any personnel not accounted for within 30 minutes."

7. Step 6.3.1
 - a. Added as new step and renumbered subsequent steps..
8. Note following step 6.8
 - a. Revised Note 1 to change "Supervisor" to "Superintendent".
 - b. Added Note 2.
9. Attachment 1
 - a. Emergency Action Level Index, Section 12.0 title - changed to delete "Injury or..."
 - b. Emergency Action Level Index, Section 15.0 title - changed "Supervisor" to "Superintendent".
 - c. Step 2.2.B. - Changed "Supervisor" to "Superintendent".
 - d. Step 4.4.1 - deleted "rate".
 - e. Step 4.4.2 - deleted "a".
 - f. Section 9.0 - completely revised section steps 9.1, 9.2, 9.3, and 9.4 and in step 9.5 changed references to "Southern Bell" to "Bell South".
 - g. Step 12.1 - deleted the Caution and old steps 12.1.1 and 12.1.2 dealing with transportation of contaminated injured personnel and initiation and discharge of ECCS and renumbered the subsequent steps.
 - h. Step 14.2.4 - revised wording to delete "...currently..." and "...by meteorological center to be..." and added \geq to the wind speeds in substeps A and B.
 - i. Step 14.3.3 - revised wording to delete "...currently..." and "...by meteorological center to be..." and added \geq to the wind speeds in substeps A and B.
 - m. Step 15.0 - Changed "Supervisor" to "Superintendent".
10. EAL-1 Flowchart
 - a. Revised to delete "rate" from the first block in the "Abnormal Rad Effluent Levels" flowpath to General Emergency.
11. EAL-2 Flowchart
 - a. Completely revised the classification flowpath for "Loss of Monitors, Alarms, and Communications".

- b. Revised the "Injury or Specific LCO" category to delete "Injury or..." and deleted "transportation of potentially contaminated injured person taken offsite" and "ECCS initiated and discharged to vessel other than by operator action" from the classification leg.
- c. Deleted block to "Contact Corporate Meteorological Center for On Site Wind Estimates > 100 mph" and deleted "...current..." and added ">" to the wind speed in each of the wind evaluation blocks in the Hurricane category classification flowpath.
- d. Revised the "Emergency Declared" "Yes" flowpath block to read "Implement PEP directed actions for the declared event".

12. Attachment 2

- a. Completely reformatted and guidelines added for their use.

13. Attachment 3

- a. Revised to identify TSC specific actions by a dotted line enclosure.
- b. Added a block "Complete and transmit event notification within 15 minutes" in each of the classification legs.
- c. Added "as conditions warrant" in the Unusual Event leg block for "Notify Security to initiate ERO notification".
- d. Added "if conditions warrant" to the "Have Chemistry energize PASS heat trace" in the Unusual Event and Alert legs.
- e. Changed the block in the YES leg of "Event Terminated" to read "Notify Offsite Agencies. Complete and Transmit Event Termination Notification Within 15 minutes."

C. OPEP-04.2

1. General Changes

- a. Reformatted procedure to change from eight sections to five, deleting old Sections 5.0, 6.0, and 7.0.
- b. Added Attachment 7, Dose Projection/Environmental Monitoring Cabinet Inventory List; and Attachment 8, Selective Signaling Individual Location Telephone Numbers
- c. Deleted references to the High Frequency Radio and added a quarterly test of the Satellite Telephone System.

2. Page 4

- a. Step 1.0, second paragraph, first sentence - changed "...at frequency specify for the..." to "...at a frequency specified for the ...".

- b. Step 2.0 - added reference to OPEP-Appendix A and renumbered subsequent steps.
- c. Step 2.8 - changed "OPT-ENG505" to "OPM-ENG505".
- d. Step 2.9 - changed "OPT-ENG008" to "OPM-GEN008" and "...Generator Electrical Inspections..." to "...Generator TAG# 2-TSC-EMERG-GEN Electrical Inspections...".

3. Page 10

- a. Step 5.4.7 - revised to delete Telecommunications Help Desk number and direct reference to OPEP-Appendix A.

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REVISION TO PLANT EMERGENCY PROCEDURES

COPIES OF REVISED PLANT EMERGENCY PROCEDURES