



Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

APR 29 1985

SERIAL: NLS-85-005

E. E. UTLEY
Executive Vice President
Power Supply and Engineering & Construction

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 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
LONG-TERM PLANNING

Dear Mr. Vassallo:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Operating License for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. The proposed revision involves the addition of a paragraph to require the implementation of CP&L's Integrated Plant Modification Plan (the Plan).

DISCUSSION AND SIGNIFICANT HAZARDS ANALYSIS

Enclosure 1 is a proposed revision to the Brunswick operating licenses involving the addition of a paragraph to require the implementation of CP&L's Integrated Plant Modification Plan (Enclosure 2). The Plan provides a summary description of the mechanisms for changing and updating the implementation schedules developed under the Company's Integrated Plant Modification Program for Brunswick, the responsibilities of the NRC and CP&L staffs with respect to the Plan, and the mechanisms for modifying the requirements of the Plan. The implementation schedules, which are not part of the Plan, will be submitted at a later date. Updating of these schedules will be accomplished as described in the Plan under the review of the NRC Project Manager.

In submitting the Plan, we understand that we are not waiving our rights to request hearings or to challenge, pursuant to established NRC regulations, any order which may be issued by the Commission which may affect either Schedule A or Schedule B.

In proposing this Plan, the Company recognizes that certain Schedule A modifications were constrained by previous regulatory deadlines without the benefit of effective integrated scheduling at the Brunswick Plant. For example, Brunswick-1 is currently embarked on an extensive 37-week outage to complete, among other modifications, the upgrade of hundreds of environmentally qualified instruments and equipment, per

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10 CFR 50.49. During the completion of this outage in late 1985, when the most resource intensive activities must occur (startup testing, final lineup, criticality, system surveillance) the Company must prepare for and commence, by November 30, 1985, an equally extensive outage for Brunswick in order to comply with the administrative deadline of 50.49 as extended by NRC. Were the integrated, living schedule, concept to be used to plan these extensive outages, the Brunswick-2 outage would have been merged with the normal refueling interval to March 1986, which would allow an orderly completion of Brunswick-1 outage and sufficient preparation for Brunswick-2 outage.

We could proceed on the outage schedule currently constrained by 50.49 deadlines as extended; however, CP&L believes that the existing 10 CFR 50.49 deadlines may force a significant number of nuclear generating facilities to be unavailable for the winter of 1985-86. In view of the potential adverse affects such a situation could have on the public welfare, and recognizing the Commissioner's directive to the Staff at their April 2, 1985 meeting to develop criteria for evaluating exceptional cases, we hope that the NRC may reconsider its present position with regard to short schedule extensions beyond the November 1985 deadline. In that event, we understand that we are not waiving our rights to apply for such an extension pursuant to 10 CFR 50.49.

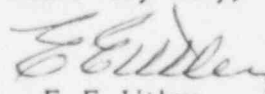
In that the proposed license amendment only requires the implementation of a plan for scheduling of modifications to the plant and does not affect the plant's design or operation, CP&L believes that operation of the facility in accordance with the proposed amendment will not 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or 2) create the possibility of new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in a margin of safety. We, therefore, concluded this amendment involves no significant hazards consideration.

ADMINISTRATIVE INFORMATION

The Company has evaluated this request in accordance with the provisions of 10 CFR 170.12 and determined that a license amendment application fee is required. A check for \$150.00 is enclosed in payment of this fee.

Should you have any questions concerning this submittal, please contact Mr. Sherwood R. Zimmerman (919) 836-6242.

Yours very truly,

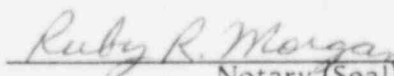

E. E. Utley

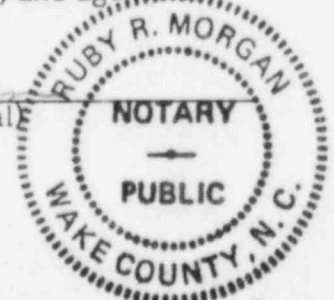
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cc: Mr. L. W. Garner (NRC-BNP)
Dr. J. Nelson Grace (NRC-R11)
Mr. M. Grotenhuis (NRC)

E. E. Utley, 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.

My commission expires: 11/27/89


Notary (Seal)



Enclosure 1
to NLS-85-005

Proposed Revision to the
Brunswick Operating License

PROPOSED LICENSE AMENDMENT

The Integrated Plant Modification Plan for Brunswick Steam Electric Plant Units 1 and 2 (the Plan) submitted on _____, is approved.

- a) The Plan shall be followed by the licensee from and after the effective date of this amendment.
- b) The provisions of this paragraph shall be effective for a period of five years following the date of issuance by the NRC and may be renewed upon application by the licensee.

Enclosure 2
to NLS-85-005

Integrated Plant Modification Plan

Carolina Power & Light Company
Integrated Plant Modification Plan
for Brunswick Steam Electric Plant Units 1 and 2

I. INTRODUCTION

This document describes the Integrated Plant Modification Plan (the Plan) to be used to implement Carolina Power & Light Company's (the Company) Integrated Plant Modification Program (the Program) for the Brunswick Steam Electric Plant Units 1 and 2 (the Plant). The Plan provides a summary description of the Program, mechanism for changing and updating implementation schedules, the interactions of NRC and Company staffs under the Plan, and mechanisms for changing the Plan. The Program enables the Company to effectively manage implementation of modifications to the Plant that have been required or proposed by the NRC, as well as other measures to enhance the safety and reliability of the Plant identified by the Company. The Program objectives are to:

- Ensure conformance to regulatory requirements;
- Provide sufficient lead times for modifications;
- Minimize changes for operators;
- Assure that training requirements are fulfilled;
- Effectively manage financial and human resources; and
- Specify the framework for making changes to developed implementation schedules.

The plan recognizes that fiscal and manpower resources are finite and that the interest of plant safety and performance are best served by careful planning for the use of these resources. The Plan integrates the presently planned work at the Plant over a nominal five year period to ensure that work items are effectively scheduled and coordinated. It also provides a means for new work items to be accommodated, taking into account schedule and resource constraints. The requirements of the Plan are fulfilled by the existence and maintenance of implementation schedules in accordance with the Plan. The implementation schedules and the Company's internal planning and scheduling processes described in the Program which are used to generate the schedules are not under the requirements of the license provision endorsing the Plan.

II. PROGRAM DESCRIPTION SUMMARY

The Program provides for a compilation and assessment of the work items currently in progress or planned. The compilation and assessment takes into account projections for budgets, site manpower, and engineering support requirements for five years, covering Plant activities. It represents a comprehensive picture of Plant work which is regularly updated to reflect changing conditions, including new NRC regulatory requirements and issues. A primary product of the Program is the development of implementation schedules as discussed below.

III. IMPLEMENTATION SCHEDULES

Implementation schedules are developed to reflect major work items in progress or planned. The development process includes the schedules, estimates of resource requirements, establishment of relative priorities and the methodology of integration. The major work items are organized into two implementation schedules:

- Schedule A - Items which have implementation dates mandated by NRC regulations, orders or license conditions.
- Schedule B - Items of either a generic or plant specific nature identified by NRC which have implementation dates committed to by the Company and which would result in either a) plant modifications, b) procedure revisions, or c) changes in facility staffing requirements; and items identified by other agencies or the Company, in anticipation of requirements or for enhancement of Plant reliability or efficiency.

Where appropriate, implementation schedules will identify completion dates keyed to fuel cycle outages.

IV. IMPLEMENTATION SCHEDULE CHANGES

An important aspect of the Plan is the recognition that Schedule A and Schedule B may need to be modified at times. Modifications to implementation schedules may arise from a variety of reasons, such as new work items; modification in the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or Company actions. It is important that the procedure used by the Company for changing the schedules be documented. The NRC must play a role in the oversight of the schedules; accordingly, it is important that the NRC's role, and the interaction between the NRC and the Company be clearly defined, as discussed below. The Company will monitor the progress of the work undertaken, manage its activities to maintain the schedule and act promptly to take necessary actions when a schedule change is needed.

When it is necessary to add a new work item or to modify the implementation schedule for an existing item, the following general guidance will be utilized to the extent appropriate:

- Avoid where practical, rescheduling of items with implementation dates mandated by NRC regulations, orders, and license conditions.
- Consider the relative priority of work items.
- Select a schedule for the new or changed item which will help in maintaining an optimum integrated program of work.
- Minimize rescheduling of items currently scheduled.

In cases where a completion date is keyed to a fuel cycle outage, a change in the outage period shall not be considered a schedule change.

A. Changes to Schedule A

1. Changes to Schedule A are categorized as follows:
 - a. Changes to existing implementation schedules
 - b. Addition of new items
 - c. Addition of items previously included on Schedule B
2. Changes Initiated by the Company
The Company may request NRC approval of changes to Schedule A in accordance with applicable NRC regulations. Such requests will be considered in a timely fashion by the NRC. If the request for a modification of Schedule A is denied, the NRC shall promptly inform the company and provide the reasons for denial.
3. NRC Action Resulting in Changes
The NRC initiates action which will change Schedule A by issuing or revising applicable regulations, orders, or license conditions. Before taking such action, the NRC, to the extent consistent with its overall regulatory responsibilities, will take into account the impact of such action on the Company's ability to complete effectively the items on Schedule A and B, and in consultation with the Company, will try to minimize such impact. The Company will have the opportunity to present alternatives which effectively accommodate the NRC's proposed actions.

B. Changes to Schedule B

1. Changes to Schedule B are categorized as follows:
 - a. Changes to existing implementation schedules
 - b. Addition of new items
2. Changes Initiated by the Company
The Company may make changes to Schedule B items as circumstances require. When proposing planned delays to implementation schedules established by a Company commitment for work items identified by the NRC, the following procedure will apply:
 - a. The Company will notify the NRC in writing at least 30 days or as early as practical in advance of the implementation date affected and include with the written notification, the reasons for the change and any compensatory actions the Company plans to institute.
 - b. The revised schedule proposed by the Company will go into effect unless, within 15 days of receipt of the notification, the NRC requests, in writing, further explanation or discussion concerning the change.
 - c. If the NRC makes such a request, discussion will be initiated to promptly develop a schedule which is mutually acceptable to the Company and the NRC Project Manager while considering overall program impact. During the course of the discussions the Schedule B dates in question are suspended pending the outcome of the discussion.
 - d. If a new schedule is established during these discussions, it will be incorporated into the subsequent semiannual submittal to the NRC.

- e. If a new schedule cannot be established during these discussions, the schedule changes originally proposed by the Company will go into effect unless subsequently modified by NRC order.

In the event of unplanned delays or circumstances beyond the Company's control, the Company shall promptly notify the NRC Project Manager of the new date and incorporate it in a revised Schedule B in the subsequent semiannual submittal to the NRC.

3. Changes initiated by the NRC
The NRC may identify new regulatory issues by means other than regulations, orders, or license conditions which may result in a) plant modifications, b) procedure revisions, or c) changes in facility staffing, for which the NRC may request the Company to provide implementation schedules. Such implementation schedules will be developed in discussions between the Company and the NRC consistent with the objectives of this Plan.

V. PERIODIC REPORTING

The Company will submit an updated implementation schedule report to the NRC semiannually. In the updated report the Company will:

- Summarize implementation schedule changes since the last report.
- Identify new items added to the report.
- Summarize the reason for schedule changes associated with regulatory issues.

VI. MODIFICATIONS TO THE PLAN

The Company and the NRC recognize that this Plan may require future modifications. Accordingly, the Company will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes will become effective upon amendment issuance by the NRC.