



Carolina Power & Light Company

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Brunswick Steam Electric Plant  
P. O. Box 10429  
Southport, NC 28461-0429

April 4, 1985

FILE: B09-13510E  
SERIAL: BSEP/85-0545

Dr. J. Nelson Grace, Administrator  
U.S. Nuclear Regulatory Commission  
Suite 3100  
101 Marietta Street NW  
Atlanta, GA 30323

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
SUPPLEMENTAL RESPONSE TO IE INSPECTION REPORT 83-11 AND 83-26

Dear Dr. Grace:

In our letter of March 30, 1984, Serial No. BSEP/84-0887, Carolina Power & Light Company provided a synopsis of the Fire Protection Improvement Program that was initiated at that time. The enclosure to this letter provides an update of program progress reflecting status, programmatic changes, and a current schedule for completion.

Should you require any additional information, please contact a member of my staff.

Very truly yours,

P. W. Howe, Vice President  
Brunswick Nuclear Project

RMP/sal/LETSMP

Enclosure

cc: NRC Document Control Desk

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ENCLOSURE 1

This enclosure describes the current status, programmatic changes, and completion schedule for the improved Fire Protection Program at Brunswick. As previously described, the task of development was divided into the following five phases:

1. Performing a needs analysis
2. Developing a set of specifications
3. Writing the procedures
4. Fire Protection organization
5. Fire Brigade training

The current status of each of these phases is described below.

Needs Analysis

The needs analysis phase is essentially complete with the exception of interorganizational program implementation requirements which are currently being developed during the Fire Protection procedure technical review process. During this phase, approximately 2,100 commitments/good practices were identified from all of the applicable source documents. Many of these identified commitments/good practices are redundant in that they appear in more than one source document that was reviewed. These commitments/good practices are stored on site in a computer system for future reference.

Specifications and Program Definition

Once the needs analysis was essentially completed as described above, the commitments/good practices were grouped into the following three functional categories: 1) Administrative Controls, 2) Periodic Testing, and 3) Pre-Fire Plans. They were then subdivided within each functional category to identify the various procedures required to implement the total program. This effort resulted in the identification of a total of 265 required safety-related procedures in the three functional categories. This number of procedures may vary somewhat as a result of interorganizational implementation requirements and/or procedure combinations for program efficiency purposes. This effort is essentially complete resulting in a set of commitments/good practices which were utilized in development of each of the 265 proposed procedures.

Procedures

The procedure writing phase was straightforward and is currently approximately 96 percent complete. The identified sets of commitments/good practices were adequately addressed in each procedure to assure regulatory compliance, interprocedural compatibility, and maximum practical Fire Protection Program effectiveness. The current procedure development status is as follows:

	<u>Total</u>	<u>Drafted</u>
1. Fire Protection Procedures (FPP)	36	34
2. Periodic Test Procedure (PT)	106	101
3. Pre-Fire Plan (PFP)	123	121

Currently, the drafted procedures are in various phases of the technical review process with training and implementation planned in stages throughout the remainder of 1985. This staged approach should assure a smooth transition to all aspects of the improved Fire Protection Program without compromising regulatory compliance and/or fire prevention practices.

#### Fire Protection Organization

The proposed Fire Protection Organization remains essentially as described in our March 30, 1984, submittal with the exception that some personnel titles have been changed. These title changes do not affect function; however, to avoid confusion, the following description of the proposed organization with the new personnel titles is provided:

The Fire Protection Organization will be led by the Fire Protection Supervisor (Senior Specialist), who will fulfill the requirements for a Fire Chief. Reporting to him will be a Technical Specialist, Drill Specialist, Administrative Specialist, Record Keeper, Clerk, and an adequate number of qualified personnel to perform required periodic testing of fire protection systems and equipment.

Each operational shift will have an adequate number of qualified Fire Brigade members to meet or exceed technical specification requirements. The Fire Brigade complement is as follows during fire emergencies: A licensed individual is the Shift Fire Commander at the fire scene and reports to the Shift Foreman in the Control Room. A Senior Auxiliary Operator reports to the Shift Fire Commander at the fire scene and implements the fire attack strategies developed by the Shift Fire Commander. The Senior Auxiliary Operator is fully qualified to direct fire fighting activities in the event the Shift Fire Commander becomes disabled or is called to a second fire. The remainder of the Fire Brigade members are Auxiliary Operators who are trained in fire fighting techniques, and they function as a team at the fire scene with the Senior Auxiliary Operator, under the direction of the Shift Fire Commander.

During normal operations, one Auxiliary Operator on each shift is assigned the responsibility of coordinating all Fire Protection related activities that occur during that shift.

This proposed organization is expected to be fully implemented by the end of 1985 following completion of the current training cycle.

### Fire Brigade Training

The Fire Brigade Training Program proposed in our March 30, 1984, submittal remains essentially unchanged with the following exception. The proposed Emergency Medical Technician (EMT) Training has been changed to a First Responder type training for Fire Brigade members that will include first aid and rescue training. Brunswick will rely on off-site local rescue squads for assistance during fire emergencies. These rescue squads maintain qualified EMTs on their staff and can respond to site emergencies very quickly. An established agreement addressing this assistance is maintained in effect.

Fire Academy Training began in August 1984 and is currently 67 percent complete with approximately 60 personnel having been trained to date. It is anticipated that an additional 30 personnel will receive this training during 1985.

Fire Brigade Refresher Training began in January 1985 and will continue on a two-year cycle with the first cycle being completed on January 1, 1987. This refresher training currently meets all 10CFR50, Appendix R, requirements with the exception of Fire Brigade meetings. However, these Fire Brigade meetings will be implemented during 1985 as applicable improved Fire Protection Program procedures are implemented. Practice fire fighting is included in this refresher training program.

Fire Protection Procedure Training began in November 1984 and is currently approximately 10 percent complete. Procedure training will be completed in phases throughout 1985 prior to applicable procedure implementation.

All other training courses described in our March 30, 1984, submittal have been developed and will be implemented during 1985.

### Schedule

A current comprehensive schedule has been developed to provide an effective management tool to coordinate all facets of the improved Fire Protection Program during the transition period. This schedule is attached for your information.

### Closing Comments

Brunswick station personnel have developed and are presently beginning implementation of what we consider a very comprehensive, quality-based Fire Protection Program. This program is designed to meet or exceed the intent of 10CFR50, Appendix R, and current versions of the National Fire Protection Association Codes, wherever practical, within the limits of the Brunswick station design. This improved Fire Protection Program is consistent with the Brunswick station management policy of endorsing a defense-in-depth approach toward protecting CP&L employees and property and the health and safety of the public. The Fire Protection Program development is currently on schedule and we expect the complete program to be fully implemented by the end of 1985.

KEY

● COMPLETE OR IMPLEMENTED

▲ MILESTONE DATES

\*\*\*\*\* PROGRESS

## BRUNSWICK FIRE PROTECTION IMPROVEMENT PLAN

## MILESTONE SCHEDULE

## PROCEDURES

## TRAINING

## FIRE BRIGADE ORGANIZATION

## DRILLS

## PRACTICE FIRE FIGHTING

