

Official

JUN 17 1986

Carolina Power and Light Company
ATTN: ✓ Mr. E. E. Utley
Senior Executive Vice President
Power Supply and Engineering
and Construction
P. O. Box 1551
Raleigh, NC 27602

Gentlemen:

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
REPORT NOS. 50-261/85-33, 50-325/85-36, 50-324/85-36 AND 50-400/85-41

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) Board Reports for your H. B. Robinson, Brunswick, and Shearon Harris facilities. The report was sent to you on January 15, 1986, and a Regional presentation was made on January 23, 1986. You provided comments by letter dated February 21, 1986.

I appreciate your efforts of evaluating the SALP Board Report and providing comments on the Board's evaluation. Your comments on the report are valuable to me as an input for assessment of our program for describing and categorizing performance of licensees. Where weaknesses in our evaluation are justified, I can make adjustments.

H. B. ROBINSON:

With respect to your comments on the H. B. Robinson assessment on radiological controls, we agree that barring any other problems, exposure history should not have a negative impact on the SALP rating. This assumes that total exposure trends are down significantly during the next SALP period as a result of your actions.

In the functional area of Fire Protection, we believe that had our Appendix R audit been conducted after your commitment date, certain of the specific open items concerning qualification testing of fire barriers seals, installation of fire damper assemblies, and III. G.3 detection and suppression requirements for several plant areas may have been enforcement issues. In view of this, I believe that a Category 2 rating in this area is justified.

The area of Quality Programs and Administrative Controls Affecting Quality is addressed as an overall issue for Carolina Power and Light Company (CP&L) in a separate paragraph.

In the Licensing Activities area, the staff agrees that Robinson licensing has consistently improved since receiving a Category 3, two SALP periods ago. As noted in the Board's report, an improving trend during the SALP period was indicated. We do not agree that the natural progression need be from Category 3 to 2 to 1 for the area to be considered as continuously improving. Most of the improvements in the licensing areas, that would warrant a Category 1, occurred toward the end of the SALP period, and thus when weighted against earlier performance, during this SALP period justify a Category 2, with an improving trend.

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Although limited inspections were conducted during this SALP period in the training area, this functional area was evaluated as being very strong, as described in the SALP report. Our inspection activity did not reveal as strong a positive impression as your response alludes to, nor does your response address potential weaknesses that our limited inspection activity failed to detect. Based on our inspection effort, I believe that a Category 2 is a fair assessment.

BRUNSWICK:

As has been identified in the SALP assessment and in numerous NRC-CP&L management meetings, the NRC considers the improvements made at Brunswick in the area of Plant Operations to be substantial during the last several years and that a Category 1 in operations is achievable during the current SALP period. The comments made in response to our SALP indicate that you believe that criticism of the plant staff for failure to clearly identify the plant's position on event-related issues prior to discussions with the NRC is in conflict with our desire to be informed of issues promptly. This conflict should not exist with the following clarification? The NRC management philosophy has not changed and remains one of encouraging interface with the resident office during all phases of issue identification, assessment, and resolution. However, I do feel that early discussions with the NRC should not inhibit your onsite management from taking prompt and decisive positions with respect to Technical Specification, system, and component operability issues. The basic inspection philosophy is that licensees have the complete responsibility for the operation of their facility and also that the NRC has confidence in the licensee's management to the extent that the NRC has reasonable assurance that the facility is being operated satisfactorily. With this in mind, the purpose of our inspection effort is only to verify our expectations.

The SALP Report Radiological Controls functional area correctly stated that Brunswick shipped more solid waste than the national average. The NRC assessment of CP&L's ALARA program compared Brunswick's performance with other BWRs who over the last five years have had similar requirements to perform TORUS modification, hanger inspections, and recirculation pipe repairs. As stated in the Report, when Brunswick's performance in reducing site manrem was compared with the national average, the conclusion reached was that their program was ineffective. Although I agree that the site's total manrem for 1985 was less than 1984, it was still significantly greater than the national average. Accordingly, I believe the ALARA program results support a rating of Category 2.

In the functional area of Emergency Preparedness, review of your response has not changed our position that this area is a Category 2. I believe that notwithstanding your active management attention in this area, the issues discussed in our SALP indicate that a Category 2 rating is justified. The staff acknowledges that the problem noted in the July 1985 exercise concerning delayed county notification does not directly reflect on your performance. Specifically, once the Site Emergency Response Team has been activated, it assumes responsibility for providing information to the various counties.

As stated above, Quality Programs and Administrative Controls are addressed as an overall issue for CP&L in a subsequent paragraph.

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Similar to the Robinson Licensing activities, Brunswick licensing performed at a Category 1 level late in the assessment period, thus receiving a Category 2 with an improving trend.

Our training area inspection effort did not fully disclose the stated improvements described in your response. Based on the fact that limited inspection effort identified several problems and that your simulator has not been updated, I believe a rating of Category 2 is appropriate.

SHEARON HARRIS:

For the Shearon Harris facility, after reviewing your comments, I consider the Emergency Preparedness functional area to still be rated a Category 2. At the end of the SALP period, Harris had 31 NRC emergency preparedness items remaining open and no actual program implementation history. As such, a Category 1, which assumes a history of good performance to the extent that NRC inspection effort can be reduced, was not demonstrated.

The staff agrees that you have taken responsible action to improve the performance in the electrical equipment and cables area. Your efforts, if continued, should reflect an improved SALP rating during the next assessment.

Quality Programs is discussed in a subsequent paragraph.

The Licensing Activities area for Harris is similar to the licensing effort for the two operating facilities. Significant improvement has occurred since receiving a Category 3 in licensing two SALP periods ago. Based on review of your comments, I have determined that a rating change in this area is not warranted.

QUALITY PROGRAMS:

The area of Quality Programs and Administrative Controls Affecting Quality is a difficult area to assess. The parameters that define this SALP area are not as clear as those that describe other areas such as Emergency Planning or Fire Protection. This area encompasses not only the quality assurance organization and its related audit, surveillance, and quality control programs, but also that elusive criteria which relates to performance and quality of construction. This criteria reflects where quality readily belongs--in the hands of the operators, maintenance technicians, construction craftsmen and other personnel who perform front-line duty. Thus, this area is impacted directly by other functional areas. In the Brunswick and Robinson Quality Programs area, we recognize that our inspection and assessment effort did not address the specific strong points that you discuss. Notwithstanding not being knowledgeable of your associated strengths in this area, our review of your performance during this SALP period continues to support our belief that the number and nature of problems identified by the NRC indicates that quality assurance effectiveness needs additional improvements to be representative of a Category 1 rating, and thus I consider the Category 2 at Robinson and Brunswick to be warranted. As you correctly stated, the Quality Programs Category 2 for Harris was based predominately on the Category 3 rating in the Electrical Equipment and Cables section. This is an example of the quality programs section being directly affected by another functional area.

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No reply to this letter is required; however, should you have any questions concerning these matters, I will be pleased to discuss them with you.

Sincerely,

Original Signed by R.D.Walker

J. Nelson Grace
Regional Administrator

- cc: ✓ G. P. Beatty, Jr., Manager
Robinson Nuclear Project Department
- ✓ R. E. Morgan, Plant General Manager
- ✓ P. W. Howe, Vice President
Brunswick Nuclear Project
- ✓ C. R. Dietz, Plant General Manager
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- bcc: ✓ C. Barth, ELD
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