DISTRIBUTION DEMONSTRATION SYSTEM ACCELERATED REGULATORY INFORMATION DISTRIBUTION STEM (RIDS) ACCESSION NBR:9003140289 DOC.DATE: 90/03/01 NOTARIZED: NO DOCKET # FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261 50-324 Brunswick Steam Electric Plant, Unit 2, Carolina Powe 05000324 50-325 Brunswick Steam Electric Plant, Unit 1, Carolina Powe 05000325 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400 AUTH.NAME AUTHOR AFFILIATION LOFLIN, L.I. Carolina Power & Light Co. RECIP.NAME RECIPIENT AFFILIATION R Document Control Branch (Document Control Desk) I SUBJECT: Forwards response to Generic Ltr 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey." D SIZE: 10 DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR | ENCL S TITLE: OR Submittal: General Distribution 05000400 / NOTES: Application for permit renewal filed. A RECIPIENT COPIES RECIPIENT COPIES D ID CODE/NAME LTTR ENCL ID CODE/NAME LTTR ENCL PD2-1 LA 1 1. PD2-1 PD 1 1 D LO,R 5 5 5 5 TOURIGNY, E 5 5 BECKER, D S

NOTE TO ALL "RIDS" RECIPIENTS:

INTERNAL: ACRS

EXTERNAL: LPDR

NRR/DOEA/OTSB11

NRR/DST/SELB 8D

NRR/DST/SRXB 8E

01

OC/LEMB

REG FILE

NSIC

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 39 ENCL 37

6

1

1

1

1

1

3

1

6

1

1

1

0

1

3

1

NRR/DET/ECMB 9H

NRR/DST/SICB 7E

NUDOCS-ABSTRACT

8E2

NRR/DST

OGC/HDS1

NRC PDR

RES/DSIR/EIB

1

1

1

1

1

1

1

1

1

1

1

0

1

1

R

Î

D

S

D

D

S

mA - +



MAR 1 1990

SERIAL: NLS-90-056

United States Nuclear Regulatory Commission ATTENTION: Document Control Desk Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 DOCKET NO. 50-261/LICENSE NO. DPR-23

SHEARON HARRIS NUCLEAR POWER PLANT DOCKET NO. 50-400/LICENSE NO. NPF-63

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

RESPONSE TO NRC GENERIC LETTER 90-01 REQUEST FOR VOLUNTARY PARTICIPATION IN NRC REGULATORY IMPACT SURVEY

Gentlemen:

Carolina Power & Light Company (CP&L) hereby submits a response to NRC Generic Letter No. 90-01 as applicable for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2), the Shearon Harris Nuclear Power Plant (SHNPP), and the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP).

Attached are completed questionnaire sheets for each of the activities listed in the Generic Letter except for INPO assistance visits and other self-assessments. Based upon input received from both NUMARC and INPO, we understand that these areas need not be addressed. Each sheet summarizes the total impacts for all three of CP&L's plants.

We appreciate the opportunity to provide input to this impact assessment and commend the NRC Staff on their initiative in undertaking this assessment with the intent of improving the regulatory process and enhancing the safe operation of nuclear power plants.

9003140289 900301 PDR ADUCK 05000261 P PNU

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

Document Control Desk (NLS-90-056) / Page 2

.

If you have any questions concerning this information, please contact me at (919) 546-6242.

Yours very truly,

Loflin T. Ί.

Manager Nuclear Licensing

LSR/ecc

•

.

Attachments

cc: Mr. R. A. Becker Mr. S. D. Ebneter Mr. L. Garner (NRC - HBR) Mr. R. Lo Mr. W. H. Ruland Mr. J. E. Tedrow Mr. E. G. Tourigny

Questionnaire Sheets

- Notes: (1) The numbers provided are expressed in total man-hours for all three plants.
 - (2) Position titles are interpreted as follows:

•

Plant Department Heads - Managers of Operations, Technical Support, Maintenance, Security, Environmental and Radiation Control, etc.

Plant Manager - The Plant General Managers for each of the three plants

Corporate Department Heads - The Project Managers and Department Managers in the nuclear organization

Chief Nuclear Officer - The Senior Vice President, Nuclear Generation

NRC Regulatory Impact Survey Questionnaire Sheet	
Type of inspection, audit or evaluation: <u>NRC Team Inspection</u>	ns
Based on actual experience over the past several years, about is this activity conducted? Approximately 9 inspections per	t how often year for
the three plants (average of 3 per plant).	
Operations/Construction areas covered:	
Extent of the activity (how many people, for how long) $^{\mathrm{Each}}$	inspection
involves 8-10 inspectors on-site for approximately 10 days.	<u></u>

1.

2.

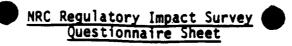
3.

4.

۰.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads ^{830 man-hours} (number involved) _	10
ь.	Plant Manager 75 man-hours (number involved)	3
c.	Corporate Department Heads <u>90 man-</u> (number involved)	⁵
d.	Corporate Vice Presidents (number involved)	
e.	Chief Nuclear Officer 100 man-hours for all activities	•



- 1. Type of inspection, audit or evaluation: Other NRC Resident, Regional, and Headquarters inspections/audits.
- 2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 100 inspections/audits per

year for the three plants (average of 34 per plant).

- 3. Operations/Construction areas covered: Various.
- Extent of the activity (how many people, for how long) Each routine inspection/audit involves 1-2 inspectors for approximately 5 days.

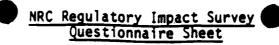
Resident inspectors cover a 30-day period.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads ⁸,300 man-hours (number involved) <u>21</u> hours
b. Plant Manager <u>840 man-hours</u> (number involved) <u>3</u>
c. Corporate Department Heads <u>420 man-</u> (number involved) <u>3</u>
d. Corporate Vice Presidents (number involved) <u>400 man-</u>
e. Chief Nuclear Officer see 5(e) on Sheet 1.

	Sheet 3 o
	NRC Regulatory Impact Survey
	Questionnaire Sheet
Type	of inspection, audit or evaluation: INPO Evaluations
••	es not include assistance visits).
Base is t	d on actual experience over the past several years, about how of his activity conducted? Approximately every 12-18 months for
each	plant.
0per	ations/Construction areas covered: All operational areas.
Exte	ent of the activity (how many people, for how long)
eval	ent of the activity (now many people, for now long)
eval Appr foll	ent of the activity (now many people, for now long) .uation involves 18-24 people for 2 weeks. roximate percentage of total time (on an annual basis) which the lowing managers must spend in direct involvement before, during, response to the activity described in Item #1.
eval Appr foll	nuation involves 18-24 people for 2 weeks.
Appr foll in r	ent of the activity (now many people, for now long) .uation involves 18-24 people for 2 weeks. roximate percentage of total time (on an annual basis) which the lowing managers must spend in direct involvement before, during, response to the activity described in Item #1.
Appr foll in r a.	nuation involves 18-24 people for 2 weeks.
Appr foll in r a. b.	nuation involves 18-24 people for 2 weeks. roximate percentage of total time (on an annual basis) which the lowing managers must spend in direct involvement before, during, response to the activity described in Item #1. Plant Department Heads 500 man- hours (number involved) 15 Plant Manager 130 man-hours (number involved) 3

- - - ` ·



- 1. Type of inspection, audit or evaluation: Insurers: ANI, NML, etc.
- 2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 6 inspections per year per.

plant.

3. Operations/Construction areas covered: Operations, maintenance, fire

protection, environmental and radiation control, inservice inspection.

4. Extent of the activity (how many people, for how long) Each inspection

involves 1-2 inspectors for an average of 2 days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads <u>30 man-hour</u> (number involved) <u>3-4</u>

- b. Plant Manager 20 man-hours (number involved) 3
- c. Corporate Department Heads (number involved)
- d. Corporate Vice Presidents _____ (number involved) _____
- e. Chief Nuclear Officer See 5(e) on Sheet 1

Sheet	5	of	7
0	-	01	

• • • •	NRC Regulatory Impact Survey
1.	Type of inspection, audit or evaluation: EPA, OSHA, DOT
2.	Based on actual experience over the past several years, about how often is this activity conducted? <u>Infrequent</u> .
3.	Operations/Construction areas covered: N/A
4.	Extent of the activity (how many people, for how long)
5.	Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
	a. Plant Department Heads (number involved)
	b. Plant Manager
	c. Corporate Department Heads (number involved)
	d. Corporate Vice Presidents (number involved)
	e. Chief Nuclear Officer
	NOTE: Minor impact by these agencies.

Sheet	6	oŤ	7

۰.	<u>NRC Regulatory Impac</u> Questionnaire S	heet
Тур	e of inspection, audit or evaluation:	State and Local Authorities
	ed on actual experience over the past this activity conducted? <u>Infrequent</u>	
0pe	rations/Construction areas covered:	N/A
	ent of the activity (how many people,	
	N/A	
App		an annual basis) which the involvement before, during, an
App fol in	proximate percentage of total time (on lowing managers must spend in direct response to the activity described in	an annual basis) which the involvement before, during, ar
App fol in	proximate percentage of total time (on lowing managers must spend in direct response to the activity described in	an annual basis) which the involvement before, during, ar i Item #1.
App fol in a.	Proximate percentage of total time (on lowing managers must spend in direct response to the activity described in Plant Department Heads Plant Manager	an annual basis) which the involvement before, during, and Item #1.
App fol in a. b.	Proximate percentage of total time (on lowing managers must spend in direct response to the activity described in Plant Department Heads Plant Manager Corporate Department Heads	an annual basis) which the involvement before, during, an Item #1. (number involved)

NOTE: Minor impact by these agencies.

- • ·

~~```. •

Sheet	7	òf	7

e i st Startestart		NRC Regulatory Impact Survey
	1.	Type of inspection, audit or evaluation: <u>NRC</u> – Required QA Audits
	2.	Based on actual experience over the past several years, about how often is this activity conducted? Approximately 6 times per year per plant.
	3.	Operations/Construction areas covered: N/A
	4.	Extent of the activity (how many people, for how long)
	5.	Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
		a. Plant Department Heads <u>960 man</u> (number involved) <u>21</u> hours
		b. Plant Manager 100 man-hours (number involved) 3
		c. Corporate Department Heads <u>25 man-(number involved)</u> <u>3</u>
		d. Corporate Vice Presidents (number involved)
		e. Chief Nuclear Officer

.