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SUBJECT: Forwards response to Generic Ltr 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey."

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Carolina Power & Light Company

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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.

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P PNU

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(NLS-90-056) / Page 2

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

Yours very truly,



L. I. Loflin
Manager
Nuclear Licensing

LSR/ecc

Attachments

cc: Mr. R. A. Becker
Mr. S. D. Ebnetter
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

1. Type of inspection, audit or evaluation: NRC Team Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 9 inspections per year for the three plants (average of 3 per plant).

3. Operations/Construction areas covered: Various

4. Extent of the activity (how many people, for how long) Each inspection involves 8-10 inspectors on-site for approximately 10 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 830 man-hours (number involved) 10
 - b. Plant Manager 75 man-hours (number involved) 3
 - c. Corporate Department Heads 90 man-hours (number involved) 5
 - d. Corporate Vice Presidents _____ (number involved) _____
 - e. Chief Nuclear Officer 100 man-hours for all activities.

NRC Regulatory Impact Survey
Questionnaire Sheet

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.

4. 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- (number involved) 21
hours
 - b. Plant Manager 840 man-hours (number involved) 3
 - c. Corporate Department Heads 420 man- (number involved) 3
hours
 - d. Corporate Vice Presidents _____ (number involved) _____
 - e. Chief Nuclear Officer see 5(e) on Sheet 1.

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO Evaluations
(does not include assistance visits).

2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately every 12-18 months for
each plant.

3. Operations/Construction areas covered: All operational areas.

4. Extent of the activity (how many people, for how long) Each
evaluation involves 18-24 people for 2 weeks.

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 500 man- (number involved) 15
 _____hours
- b. Plant Manager 130 man-hours (number involved) 3
- c. Corporate Department Heads 50 man- (number involved) 3
 _____hours
- d. Corporate Vice Presidents _____ (number involved) _____
- e. Chief Nuclear Officer see 5(e) on Sheet 1.

NRC Regulatory Impact Survey
Questionnaire Sheet

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 30 man-hours (number involved) 3-4
 - 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

NRC Regulatory Impact Survey
Questionnaire Sheet

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? Infrequent.

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long) _____
N/A

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.

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: State and Local Authorities

2. Based on actual experience over the past several years, about how often is this activity conducted? Infrequent

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long) _____
N/A

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.

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC - 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) _____
Approximately 6 people for 2 weeks.
-
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 960 man- (number involved) 21
 hours
 - b. Plant Manager 100 man-hours (number involved) 3
 - c. Corporate Department Heads 25 man- (number involved) 3
 hours
 - d. Corporate Vice Presidents _____ (number involved) _____
 - e. Chief Nuclear Officer _____