

Official

DEC 19 1989

Docket Nos. 50-325, 50-324
License Nos. DPR-71, DPR-62

Carolina Power and Light Company
ATTN: Mr. Lynn W. Eury
Executive Vice President
Power Supply
P. O. Box 1551
Raleigh, NC 27602

Gentlemen:

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
(NRC INSPECTION REPORT NOS. 50-325/89-28 AND 50-324/89-28)

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) for your Brunswick facility which was sent to you on November 3, 1989; our meeting of November 9, 1989, at which we discussed the report, and your written comments dated December 6, 1989.

We appreciate your suggestion to clarify the last paragraph of Section I.A (page 2). The sentence has been modified to reflect your comment. In addition a date in the first paragraph of the same section has been corrected from November 12, 1989 to November 12, 1988. With this errata, the interim report sent to you on November 3, 1989, constitutes our final SALP report.

We will monitor the implementation of the steps that are being taken to address concerns identified in the report. I have enclosed a summary of the meeting and the slides which were used by the NRC, a copy of your written comments, and the errata sheets for the Final SALP report for the period September 1, 1988 through August 31, 1989.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter with the referenced enclosures will be placed in the NRC's Public Document Room. 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,

Stewart D. Ebnetter
Regional Administrator

Enclosures: (See page 2)

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PDR ADOCK 05000324
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IE 40

DEC 19 1989

Enclosures:

- 1. SALP Presentation Meeting Summary and Slides
- 2. Licensee Response
- 3. Errata Sheets for the Final SALP Report

cc w/encls:

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WEC
RE
sthr
12/15/89
Concur by Phoebe
DRR 12/14
Adams/Fouquier

RII:DRP
DR
 RCarroll
 12/15/89

RII:DRP
DR
 RHDance
 12/15/89

RII:DRP
DR
 DVerrelli
 12/15/89

RII:DRP
DR
 VReyes
 12/19/89

RII:ORA
DR
 JMithoan
 12/16/89

for

ENCLOSURE 1

SALP PRESENTATION MEETING
SUMMARY AND SLIDES

OPERATIONS - CATEGORY 2

- MANAGEMENT EFFORTS WERE SUCCESSFUL IN ARRESTING THE DECLINING TREND OBSERVED DURING LAST ASSESSMENT PERIOD:
 - CHALLENGES TO OPERATOR'S EFFECTIVENESS WERE REDUCED AS EVIDENT BY A SIGNIFICANT DECREASE IN CONTROL BOARD TROUBLE TAGS.
 - ADDITION OF EXTRA OPERATOR PER SHIFT.
- PLANT HOUSEKEEPING AND DRYWELL CLOSEOUT PROCESS CONTINUED TO BE A STRENGTH.
- LICENSED OPERATIONS STAFF CONTINUED TO PERFORM SATISFACTORILY DURING OFF-NORMAL TRANSIENT CONDITIONS.
- PROCEDURAL ADHERENCE WAS ADEQUATE WITH ONLY AN OCCASIONAL EXAMPLE OF FAILURE TO FOLLOW PROCEDURE.

OPERATIONS - CATEGORY 2 (CON'T)

- ° ALTERNATE SAFE-SHUTDOWN PROCEDURES WERE DETAILED AND COMPREHENSIVE. EXTENSIVE MEASURES WERE TAKEN TO IMPROVE EMERGENCY OPERATING PROCEDURES, WITH FURTHER ENHANCEMENT UNDERWAY.

- ° OTHER MANAGEMENT INITIATIVES, SUCH AS A METHOD TO CAPTURE CONDITIONS ADVERSE TO QUALITY THROUGH ASSIGNING INDIVIDUAL RESPONSIBILITY AND A SEMI-ANNUAL REVIEW OF OPERATIONS EVENTS TO FIND OVERALL TRENDS AND SUGGEST IMPROVEMENTS, ARE GOOD.

- ° APPENDIX R AUDIT WAS UNTIMELY, BUT SOUND TECHNICAL JUDGEMENT WAS DEMONSTRATED WITH RESPECT TO RESOLVING IDENTIFIED DEFICIENCIES BEFORE RESTARTING UNIT 1.

- ° CONTROLLING PLANT CONDITIONS FOR A SHUTDOWN UNIT CONTINUED TO BE A MAJOR WEAKNESS.

- ° DESPITE THE INCREASED MANAGEMENT ATTENTION IN PLANT OPERATIONS, ACTION TAKEN WITH RESPECT TO PERSONNEL ERRORS, PARTICULARLY IN THE AREAS OF CONFIGURATION CONTROL AND CLEARANCES, WERE YET TO BE EFFECTIVE.

RADIOLOGICAL CONTROLS - CATEGORY 2

- THE HEALTH PHYSICS (HP) PROGRAM CONTINUED TO BE ADEQUATELY IMPLEMENTED.
- OVERALL QUALITY AND EXPERIENCE LEVEL OF HP STAFF REMAINED A PROGRAM STRENGTH.
- POSITIVE MANAGEMENT ATTENTION/SUPPORT WAS REFLECTED BY THE:
 - SUCCESSFUL COMPLETION OF DECHANNELING AND SUBSEQUENT SHIPMENT OF SPENT FUEL TO SHEARON HARRIS
 - IMPROVEMENTS IN EFFLUENT MONITOR OPERABILITY
 - IMPROVEMENTS IN CONTROLLING PERSONNEL CONTAMINATION THROUGH THE ACQUISITION OF NEW IPM-8 WHOLE BODY FRISKERS
 - WELL DEFINED TRAINING PROGRAMS (HP AND GET) AND THE TIME ALLOCATED FOR EMPLOYEES TO ATTEND THE TRAINING SESSIONS.

RADIOLOGICAL CONTROLS - CATEGORY 2 (CON'T)

- ° THE STATION'S COLLECTIVE RADIATION DOSE REMAINED RELATIVELY HIGH, WITH IGSCC RELATED ACTIVITIES BEING THE MAJOR CONTRIBUTOR.
 - MANAGEMENT'S COMMITMENT TO REPLACE RECIRCULATION PIPE IS A POSITIVE STEP IN REDUCING DOSE IN THE LONG TERM.
 - HYDROGEN WATER CHEMISTRY CONTROL WAS IMPLEMENTED IN UNIT 2, BUT NOT FULLY OPERATIONAL.
 - ACTIONS TAKEN IN RESPONSE TO NRC INITIATIVES INVOLVING ALARA IMPROVEMENTS WERE INEFFECTIVE, LACKING NECESSARY MANAGEMENT ATTENTION.

EMERGENCY PREPAREDNESS - CATEGORY 2

- THE CAPABILITY TO IMPLEMENT CRITICAL ASPECTS OF EMERGENCY PREPAREDNESS (EP) WAS DEMONSTRATED DURING SIMULATED AND ACTUAL EMERGENCY EVENTS.
- THE SITE'S EMERGENCY PLAN, EMERGENCY FACILITIES, STAFFING, AND EQUIPMENT WAS ADEQUATELY MAINTAINED.
- THE EP TRAINING PROGRAM HAD BEEN SUFFICIENTLY CHANGED TO INCLUDE PROCTORED EXAMS AND AUDITABLE TRAINING RECORDS.
- DURING THE 1988 ANNUAL EXERCISE SOME ESSENTIAL ELEMENTS OF EMERGENCY RESPONSE WERE IDENTIFIED AS REQUIRING IMPROVEMENT.
 - NOTIFICATION METHODS AND PROCEDURES
 - ONSITE EMERGENCY ORGANIZATION
 - EMERGENCY CLASSIFICATION SYSTEM
- CORRECTIVE ACTION WAS NOT EFFECTIVE AS EVIDENT BY THE REPEATED FAILURE TO MAKE FOLLOWUP OFFSITE NOTIFICATIONS FROM THE CONTROL ROOM.

MAINTENANCE/SURVEILLANCE - CATEGORY 2

- SIGNIFICANT IMPROVEMENT IN REDUCING THE NUMBER OF SAFETY SYSTEM FAILURES.
- MOV PROGRAM CONSIDERED A STRENGTH.
- AUTOMATED TRACKING SYSTEMS CONTINUED TO BE EXCELLENT TOOLS IN MANAGING THE MAINTENANCE AND SURVEILLANCE OF THE STATION. SUCH SYSTEMS WERE UTILIZED TO IMPROVE THE IDENTIFICATION AND TRACKING OF REPETITIVE FAILURES.
- THE MAINTENANCE AND SURVEILLANCE PROCEDURES UPGRADE PROGRAM INCLUDING ALLOTTED RESOURCES WERE CONSIDERED GOOD.
- OUTSTANDING WORK REQUESTS/JOB ORDERS STEADILY TRENDED DOWNWARD.
- THE INCLUSION OF AN INFRARED THERMOGRAPHY PROGRAM WAS CONSIDERED AN ASSET TO THE OVERALL MAINTENANCE PROGRAM.
- OBSERVATION OF SURVEILLANCE TEST ACTIVITIES SHOWED THAT TEST PERSONNEL WERE TECHNICALLY KNOWLEDGEABLE AND EFFECTIVE IN TEST COORDINATION.

MAINTENANCE/SURVEILLANCE - CATEGORY 2 (CON'T)

- ISI ACTIVITIES ASSOCIATED WITH THE EXAMINATION OF UNIT 1 PIPING AND COMPONENTS FOR IGSCC WERE GOOD.
- THE PROGRAM FOR UPGRADING COMPONENT IDENTIFICATION LABELING AND CORRECTING EXISTING LABELING DEFICIENCIES WAS CONSIDERED DEFICIENT.
- WEAKNESS IN THE MAINTENANCE WORK PLANNING AND PERFORMANCE PROCESS WAS INDICATED BY THE NUMBER OF IDENTIFIED POST MAINTENANCE TEST DEFICIENCIES.
- SEVERAL RECURRING MAINTENANCE RELATED SYSTEM PROBLEMS STILL LACKED THE NECESSARY ATTENTION FOR PROMPT AND COMPLETE RESOLUTION.
- SOME SYSTEMS/EQUIPMENT WERE NOT ADEQUATELY MAINTAINED - THE AUXILIARY BUS DUCTWORK BEING ONE WHICH CONTRIBUTED TO THE UNIT 2 LOSS OF OFFSITE POWER EVENT/MANUAL SCRAM.
- CONTROL OF FUSES HAS BEEN A RECURRING PROBLEM.
- UNNECESSARY SAFETY SYSTEM ACTUATIONS OCCURRED DUE TO THE SHORTING OF INSTRUMENT LEADS DURING SURVEILLANCE TESTING.

SECURITY - CATEGORY 1

- SECURITY ACTIVITIES CONTINUED TO BE A STRENGTH.
- THE SITE'S CONTRACT SECURITY FORCE WAS ADEQUATELY STAFFED AND APPROPRIATELY TRAINED AND EQUIPPED.
- OBSERVED PERFORMANCE OF SECURITY PERSONNEL SHOWED THEM TO BE KNOWLEDGEABLE, ALERT, AND CAPABLE.
- SECURITY MANAGEMENT CONTINUED TO BE INTIMATELY INVOLVED IN SECURITY FORCE ACTIVITIES, AGGRESSIVELY SEEKING EFFECTIVE AND LASTING SOLUTIONS TO SECURITY-RELATED PROBLEMS.
- TWO NON-CITED VIOLATIONS WERE IDENTIFIED AND PROMPTLY CORRECTED BY THE LICENSEE.
 - INATTENTIVE GUARD AT A DEGRADED VITAL AREA BARRIER.
 - FAILURE TO REPORT ABOVE EVENT IN A TIMELY FASHION.

ENGINEERING/TECHNICAL SUPPORT - CATEGORY 2

- PERFORMANCE WAS MIXED, WITH IMPROVEMENT EVIDENT IN THE LATTER HALF OF THE ASSESSMENT PERIOD.
- EFFECTIVE TECHNICAL SUPPORT AND MANAGEMENT INVOLVEMENT WAS DEMONSTRATED ON A NUMBER OF TECHNICAL ISSUES, INCLUDING HPCI RELIABILITY IMPROVEMENTS AND RESOLUTION OF UNIT 1 REACTOR VESSEL NOZZLE CRACK INDICATIONS.
- ACTIONS TAKEN IN THE LATTER HALF OF THE ASSESSMENT PERIOD BROUGHT ABOUT IMPROVEMENTS IN SYSTEM ENGINEERING INVESTIGATION AND ROOT CAUSE DETERMINATIONS.
- SIGNIFICANT PROGRESS WAS MADE TOWARDS THE REDUCTION OF THE ENGINEERING WORK REQUEST BACKLOG, THROUGH THE COMPLETION OF THEIR INITIAL REVIEW AND DISPOSITION.
- ACTIONS TAKEN TOWARDS THE END OF THE ASSESSMENT PERIOD TO ADDRESS EWR RELATED MATERIAL PROBLEMS AND OBSOLETE PARTS, CONFIRMED MANAGEMENT'S INTENTIONS TO RESOLVE THIS ISSUE.

ENGINEERING/TECHNICAL SUPPORT - CATEGORY 2 (CON'T)

- OPERATOR TRAINING WAS CONSIDERED GOOD, WITH A NOTED IMPROVEMENT IN TRAINING REFERENCE MATERIAL.
- MANAGEMENT WAS COMMITTED TO IMPROVING THE SITE SPECIFIC SIMULATOR. A LARGE NUMBER OF DEFICIENCIES WERE CORRECTED AND FURTHER CHANGES HAVE BEEN PLANNED TO ASSURE CERTIFICATION STANDARDS ARE MET PRIOR TO THE DEADLINE.
- ENGINEERING SUPPORT FOR SEVERAL SERVICE WATER ISSUES WAS NOT AGGRESSIVE. ONCE PROMPTED BY THE NRC, HOWEVER, THE RESOLUTION OF THESE ISSUES WAS THROUGH.
- THE PROGRAM FOR DESIGN CHANGE DEVELOPMENT WAS INADEQUATE DUE TO WEAK DESIGN BASE INFORMATION RESOURCE, INADEQUATE INTERFACE DEFINITION, OUTDATED PROCEDURES, AND UNAVAILABILITY OF PREOPERATIONAL TEST DATA.
- ADMINISTRATIVE CLOSEOUT OF SOME MODIFICATIONS WAS UNTIMELY, BEING LEFT OPEN AFTER IMPLEMENTATION ON AN AVERAGE OF 2 YEARS.
- COMMUNICATION PROBLEMS ON SOME ISSUES HINDERED PROMPT INITIAL ACTION.

SAFETY ASSESSMENT/QUALITY VERIFICATION - CATEGORY 2

- AN INCREASED MANAGEMENT PRESENCE IN THE POWER BLOCK AND A DEMONSTRATED WILLINGNESS TO MAKE THE HARD DECISIONS ATTRIBUTED TO THE IMPROVEMENT IN THIS AREA.
- THE CORRECTIVE ACTION PROGRAM WAS IMPROVED THROUGH THE SITE WIDE IMPLEMENTATION OF A CORRECTIVE ACTION PROCEDURE.
- THE END OF THE ASSESSMENT PERIOD APPOINTMENT OF A TECHNICAL ASSISTANT TO THE PLANT GENERAL MANAGER RESPONSIBLE FOR COORDINATING THE SITE CORRECTIVE ACTION PROCESS WAS CONSIDERED A POSITIVE STEP.
- IMPROVEMENTS WERE SEEN IN THE LICENSEE'S ABILITY TO ADEQUATELY ASSESS THE SAFETY SIGNIFICANCE OF DISCREPANT CONDITIONS AND TAKE THE APPROPRIATE CORRECTIVE ACTION.
- ONCE AN ISSUE WAS PROPERLY CATEGORIZED AND THE APPROPRIATE LEVELS OF PLANT MANAGEMENT WERE AWARE, ACTIONS TO RESOLVE THE ISSUE WERE EXTENSIVE.

SAFETY ASSESSMENT/QUALITY VERIFICATION - CATEGORY 2 (CON'T)

- ONSITE QUALITY ASSURANCE ACTIVITIES WERE PROPERLY FOCUSED, WITH AN INCREASED TREND TOWARD PERFORMANCE BASED SURVEILLANCES.

- THE APPENDIX R COMPLIANCE FOCUSED CORPORATE QA AUDIT FOUND SEVERAL SIGNIFICANT PROBLEMS.

- ON SEVERAL OCCASIONS SAFETY REVIEWS LACKED THE NECESSARY VIGOROUS QUESTIONING AND WERE HAMPERED BY A FAILURE TO GET THE RIGHT PEOPLE INVOLVED WHEN ISSUES EMERGED.

- THE ONSITE NUCLEAR SAFETY GROUP'S IMPACT ONSITE HAD DIMINISHED THIS ASSESSMENT PERIOD DUE TO A REDUCTION IN STAFF.

UNITED STATES
NUCLEAR REGULATORY
COMMISSION

SYSTEMATIC ASSESSMENT
OF
LICENSEE PERFORMANCE

(SALP)

CAROLINA POWER AND LIGHT COMPANY

SALP PERIOD

SEPTEMBER 1, 1988 through AUGUST 31, 1989

BRUNSWICK UNITS 1 & 2

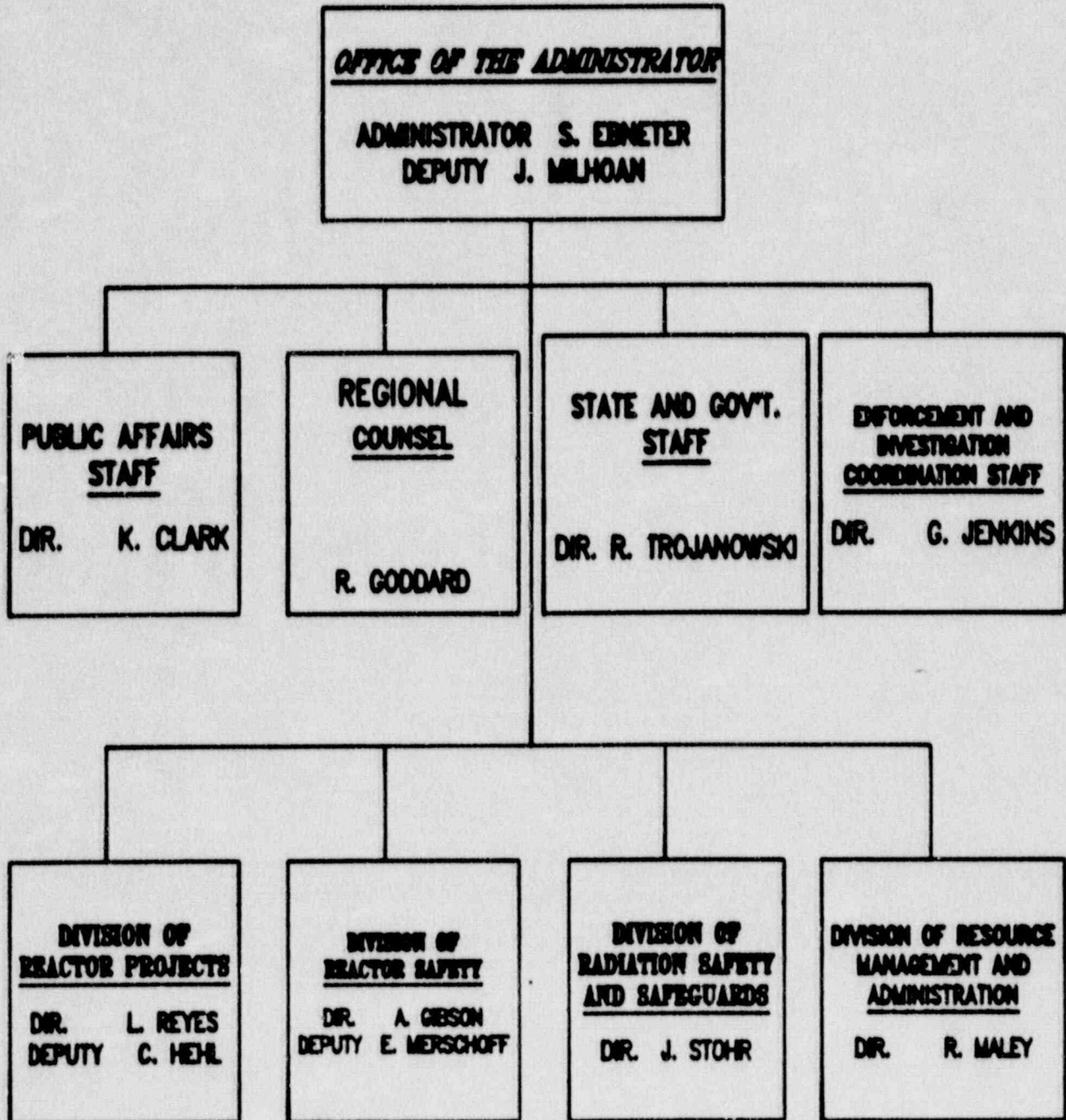
NOVEMBER 9, 1989

SOUTHPORT, NORTH CAROLINA

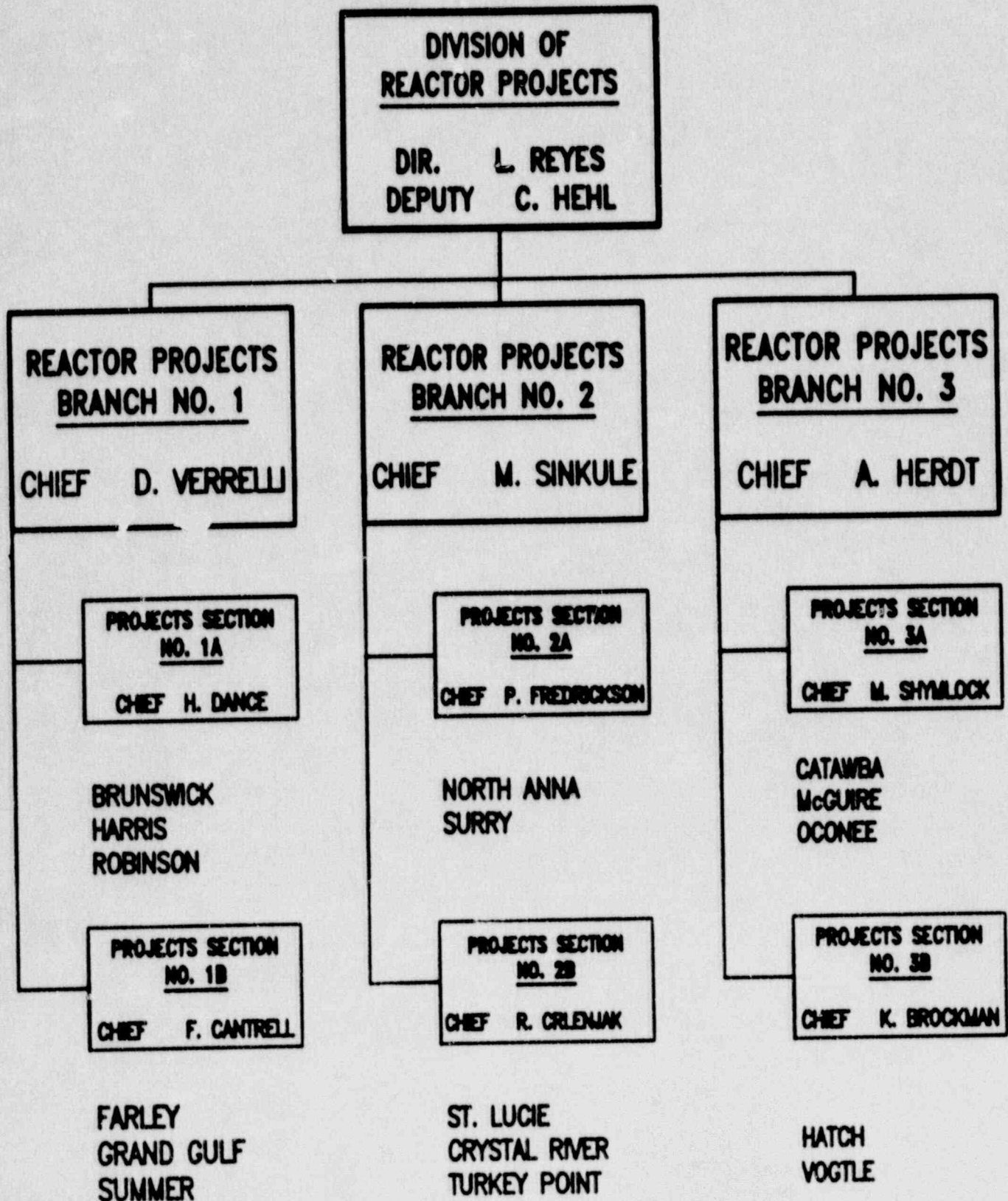
SALP PROGRAM OBJECTIVES

1. IDENTIFY TRENDS IN LICENSEE PERFORMANCE
2. PROVIDE A BASIS FOR ALLOCATION
OF NRC RESOURCES
3. IMPROVE NRC REGULATORY PROGRAM

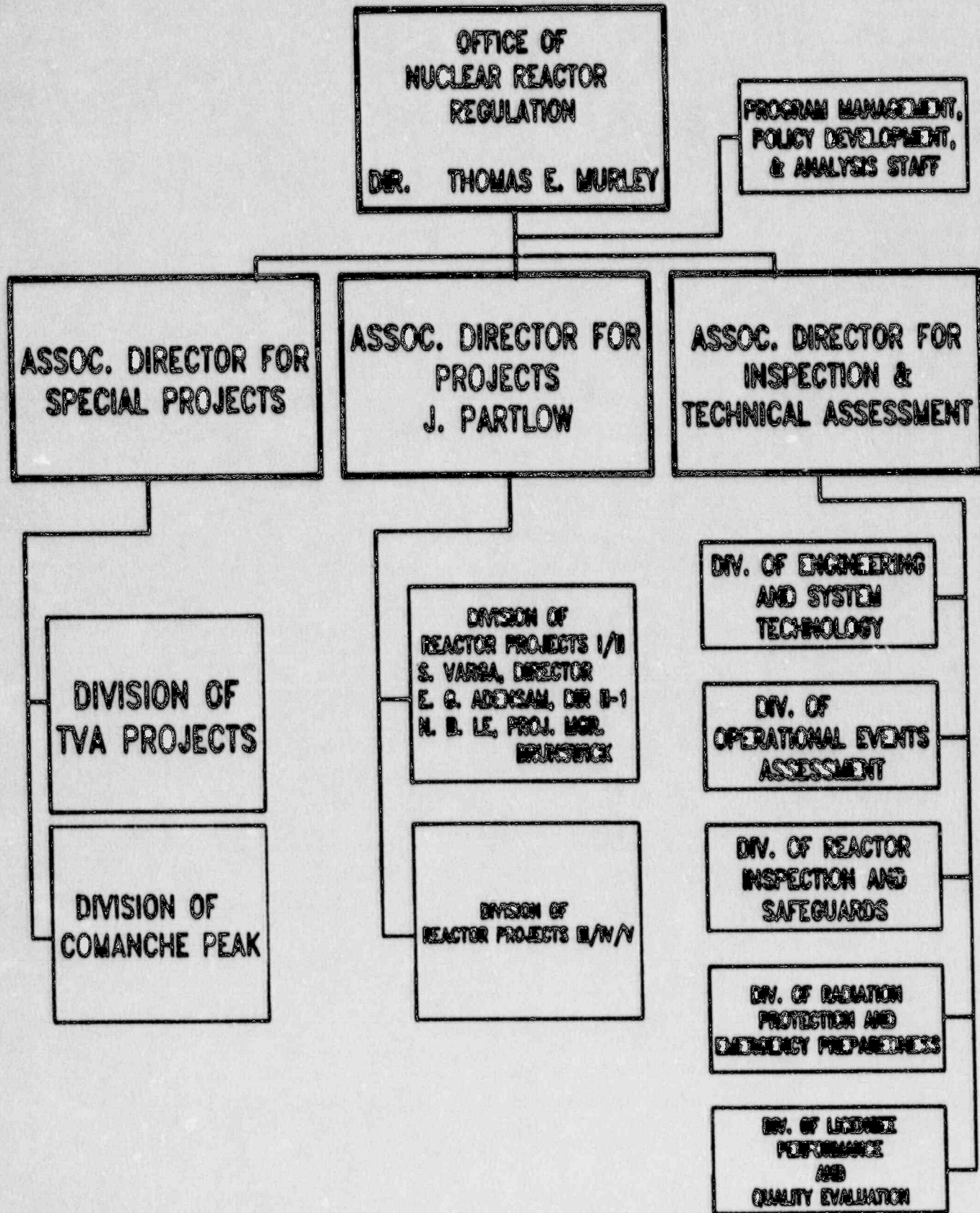
REGION II ORGANIZATION



DIVISION OF REACTOR PROJECTS ORGANIZATION



NRR ORGANIZATION



PERFORMANCE ANALYSIS AREAS

FOR OPERATING REACTORS

A. PLANT OPERATIONS

B. RADIOLOGICAL CONTROLS

C. MAINTENANCE / SURVEILLANCE

D. EMERGENCY PREPAREDNESS

E. SECURITY

F. ENGINEERING / TECHNICAL SUPPORT

G. SAFETY ASSESSMENT / QUALITY VERIFICATION

AREA PERFORMANCE

CATEGORY 1

LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT ARE READILY EVIDENT AND PLACE EMPHASIS ON SUPERIOR PERFORMANCE OF NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES, WITH THE RESULTING PERFORMANCE SUBSTANTIALLY EXCEEDING REGULATORY REQUIREMENTS. LICENSEE RESOURCES ARE AMPLE AND EFFECTIVELY USED SO THAT A HIGH LEVEL OF PLANT AND PERSONNEL PERFORMANCE IS BEING ACHIEVED. REDUCED NRC ATTENTION MAY BE APPROPRIATE.

AREA PERFORMANCE

CATEGORY 2

LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT
IN THE PERFORMANCE OF NUCLEAR SAFETY OR SAFEGUARDS
ACTIVITIES ARE GOOD. THE LICENSEE HAS ATTAINED A
LEVEL OF PERFORMANCE ABOVE THAT NEEDED TO MEET
REGULATORY REQUIREMENTS. LICENSEE RESOURCES ARE
ADEQUATE AND REASONABLY ALLOCATED SO THAT GOOD PLANT
AND PERSONNEL PERFORMANCE IS BEING ACHIEVED. NRC
ATTENTION MAY BE MAINTAINED AT NORMAL LEVELS.

AREA PERFORMANCE

CATEGORY 3

LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT
IN THE PERFORMANCE OF NUCLEAR SAFETY OR SAFEGUARDS
ACTIVITIES ARE NOT SUFFICIENT. THE LICENSEE'S
PERFORMANCE DOES NOT SIGNIFICANTLY EXCEED THAT NEEDED
TO MEET MINIMAL REGULATORY REQUIREMENTS. LICENSEE
RESOURCES APPEAR TO BE STRAINED OR NOT EFFECTIVELY
USED. NRC ATTENTION SHOULD BE INCREASED ABOVE
NORMAL LEVELS.

EVALUATION CRITERIA

1. MANAGEMENT INVOLVEMENT IN ASSURING QUALITY
2. APPROACH TO RESOLUTION OF TECHNICAL ISSUES
FROM A SAFETY STANDPOINT
3. RESPONSIVENESS TO NRC INITIATIVES
4. ENFORCEMENT HISTORY
5. REPORTING AND ANALYSIS OF REPORTABLE EVENTS
6. STAFFING (INCLUDING MANAGEMENT)
7. TRAINING EFFECTIVENESS AND QUALIFICATION

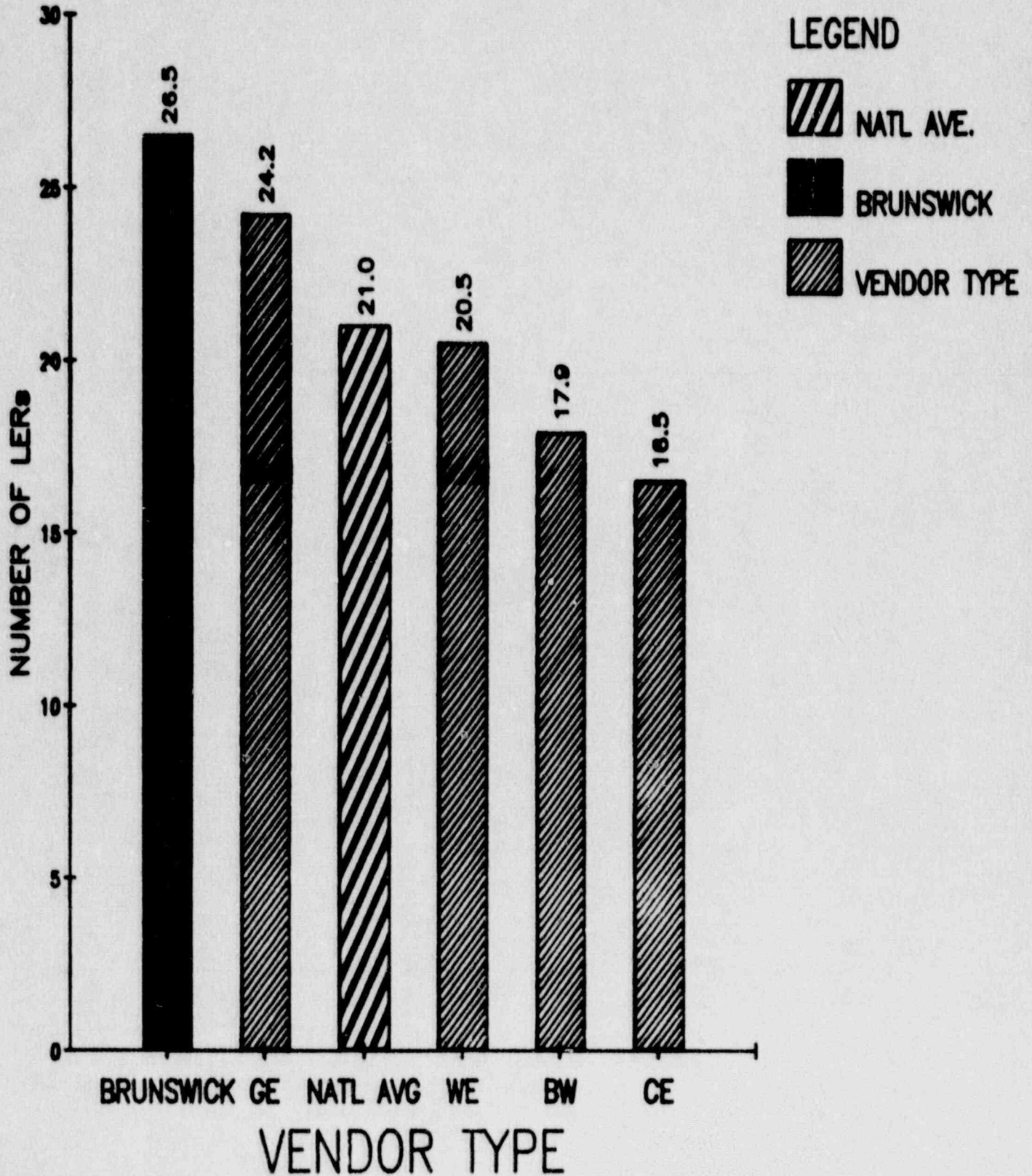
VIOLATION SUMMARY

SEPTEMBER 1, 1998 through AUGUST 31, 1999

	I	II	III	IV	V
BRUNSWICK 1	0	0	3	13	5
BRUNSWICK 2	0	0	1	12	5
REGION II AVE. PER UNIT	0	0	<1	13	2

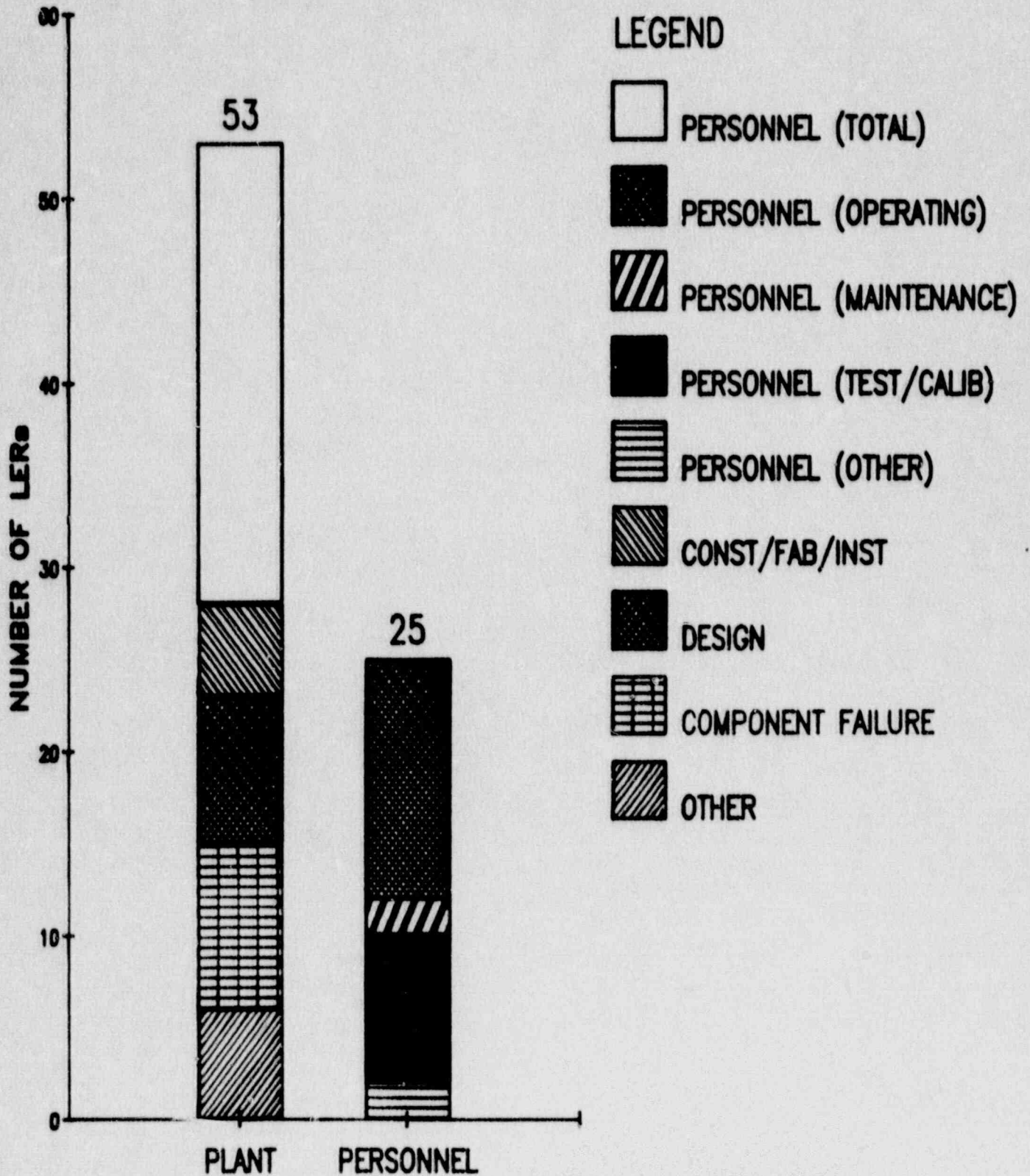
LERs PER UNIT

SEPTEMBER 1, 1988 THROUGH AUGUST 31, 1989



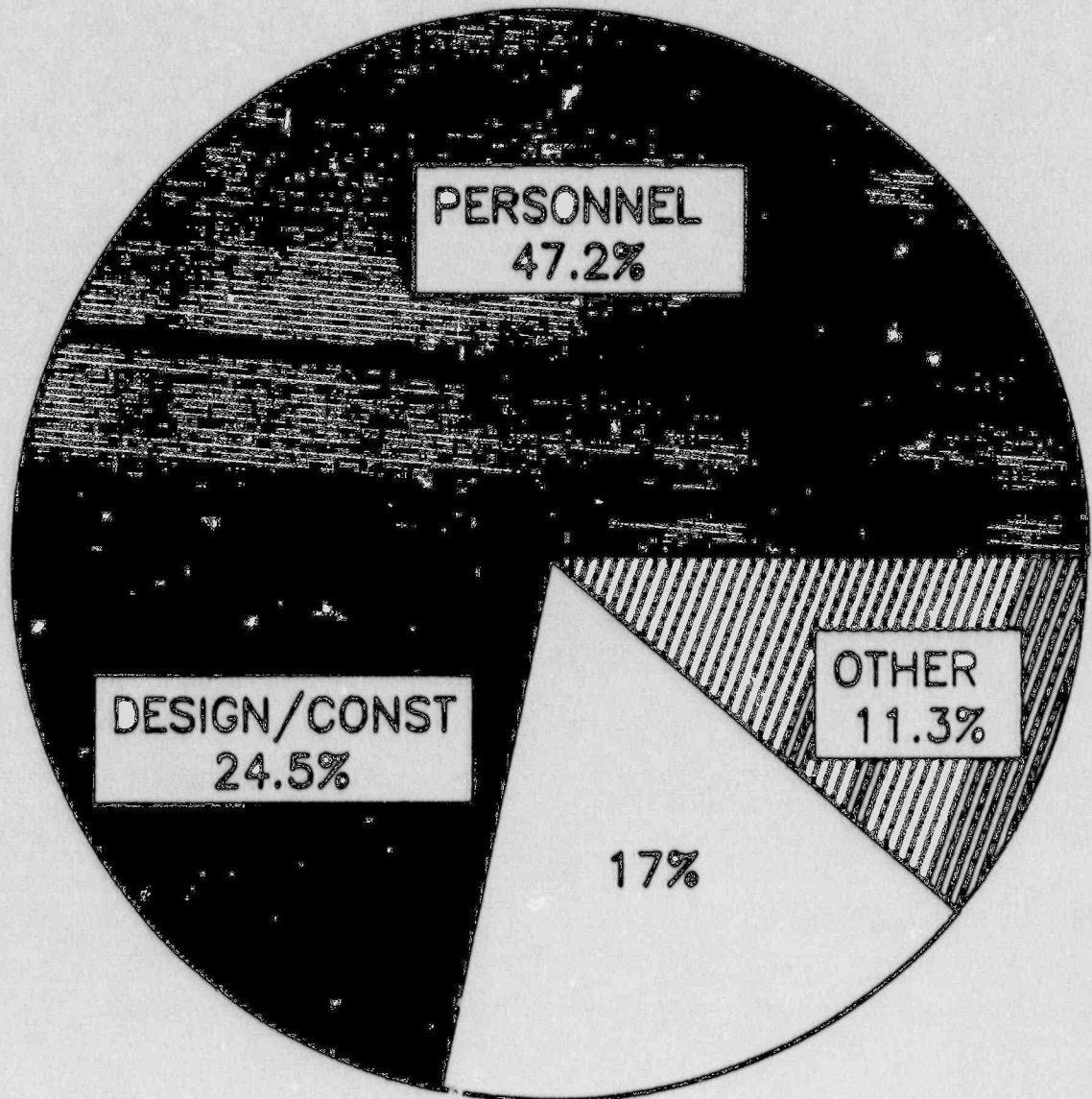
BRUNSWICK LERs

SEPTEMBER 1, 1988 THROUGH AUGUST 31 1989



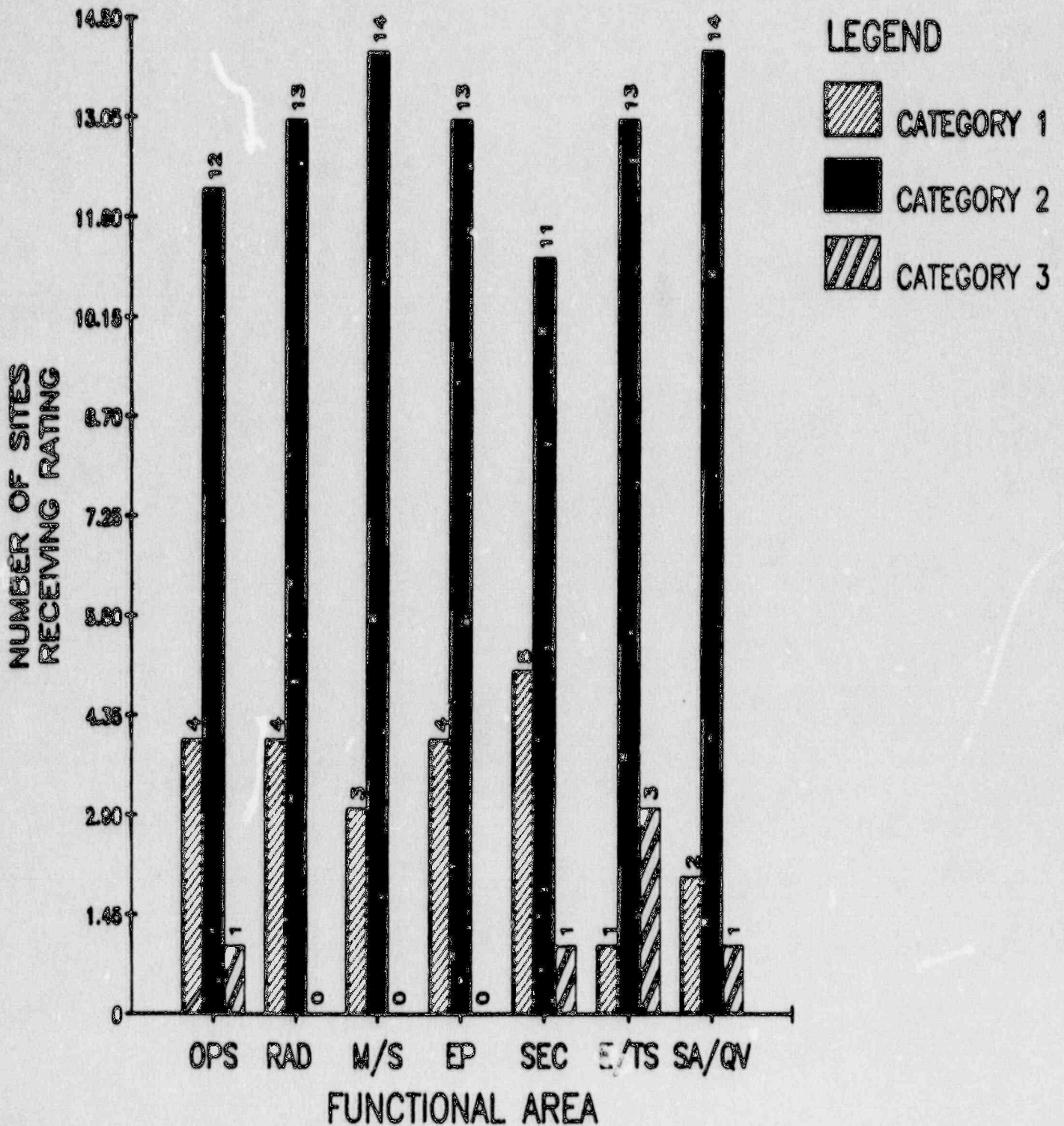
BRUNSWICK LERs (PLANT)

SEPTEMBER 1, 1988 through AUGUST 31, 1989



COMP. FAILURE

FUNCTIONAL AREA COMPARISON FOR REGION II SITES SALP CYCLE 7



CP&L

Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602
(919) 546-6331

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DEC 06 1989

ENCLOSURE 2

LICENSEE RESPONSE

LYNN W. EURY
Executive Vice President
Power Supply

SERIAL: NLS-89-311
10CFR50

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
RESPONSE TO NRC SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Gentlemen:

Carolina Power and Light Company (CP&L) has reviewed the Interim Systematic Assessment of Licensee Performance (SALP) Board Report forwarded by your letter of November 3, 1989. CP&L has also reviewed the additional NRC comments presented during the public SALP Report review meeting of November 9, 1989. The report evaluated the performance of CP&L's Brunswick Nuclear Project during the period September 1, 1988 through August 31, 1989.

The Company appreciates the NRC's efforts to present a balanced report and understands the need to identify and provide additional, objective evidence of our performance improvements. CP&L takes the observations, recommendations, and ratings of the SALP Board very seriously, and will continue to use them as an input into our continuing process of evaluating and improving our overall performance.

As reflected by our comments during the November 9, 1989 meeting, we generally concur with the SALP Board's observations. The following is a suggested clarification to the last paragraph of Section I.A (page 2). The second sentence would be accurate as follows:

All nuclear activities, except Quality Assurance, report to a single Senior Vice President - Nuclear. The Senior Vice President - Nuclear and the Manager - Quality Assurance report to an Executive Vice President.

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Steps have been, and are being taken, to address identified concerns. CP&L will continue to strive toward the goals of performance and operational excellence.

Yours very truly,



Lynn W. Eary

PDM/pdm (\cor\SALPRES)

cc: Mr. S. D. Ebnetter
Mr. W. H. Ruland
Mr. E. G. Tourigny

ENCLOSURE 3

ERRATA SHEETS FOR THE FINAL SALP REPORT

<u>Page</u>	<u>Line</u>	<u>Interim Report Reads</u>	<u>Final Report Reads</u>
coversheet	2	INTERIM SALP REPORT	FINAL SALP REPORT
1	42	November 12, 1989	November 12, 1988
2	32-36	All nuclear activities report to....	All nuclear activities, except Quality Assurance,....

SEE ERRATA SHEET

ENCLOSURE
INTERIM SALP REPORT

U. S. NUCLEAR REGULATORY COMMISSION (NRC)
REGION II

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

INSPECTION REPORT NUMBERS

50-325/89-28 AND 50-324/89-28

CAROLINA POWER AND LIGHT COMPANY (CP&L)

BRUNSWICK 1 AND 2

SEPTEMBER 1, 1988 - AUGUST 31, 1989

SEE ERRATA SHEET

I. INTRODUCTION

The Systematic Assessment of Licensee Performance (SALP) program is an integrated NRC staff effort to collect available observations and data on a periodic basis and to evaluate licensee performance on the basis of this information. The program is supplemental to normal regulatory processes used to ensure compliance with NRC rules and regulations. It is intended to be sufficiently diagnostic to provide a rational basis for allocation of NRC resources and to provide meaningful feedback to the licensee's management regarding the NRC's assessment of their facility's performance in each functional area.

AN NRC SALP Board, composed of the staff members listed below, met on October 16, 1989, to review the observations and data on performance, and to assess licensee performance in accordance with Chapter NRC-0516, "Systematic Assessment of Licensee Performance." The guidance and evaluation criteria are summarized in Section III of this report. The Board's findings and recommendations were forwarded to the NRC Regional Administrator for approval and issuance.

This report is the NRC's assessment of the licensee's safety performance at Brunswick Units 1 and 2 for the period September 1, 1988 through August 31, 1989.

The SALP Board for Brunswick 1 and 2 was composed of:

- L. A. Reyes, Director, Division of Reactor Projects (DRP),
Region II (RII) (Chairman)
- K. E. Perkins, Acting Director, Division of Reactor Safety, RII
- W. E. Cline, Chief, Nuclear Materials Safety and Safeguards Branch,
Division of Radiation Safety and Safeguards, RII
- D. M. Verrelli, Chief, Reactor Projects Branch 1, DRP, RII
- E. G. Adensam, Director, Project Directorate II-1, Office of Nuclear
Reactor Regulation (NRR)
- W. H. Ruland, Senior Resident Inspector, Brunswick, DRP, RII
- N. B. Le, Project Manager, Project Directorate II-1, NRR

Attendees at SALP Board Meeting:

- H. C. Dance, Chief, Project Section 1A, DRP, RII
- E. G. Tourigny, Senior Project Manager, Project Directorate II-1, NRR
- R. E. Carroll, Project Engineer, Project Section 1A, DRP, RII
- T. Foley, Operations Engineer, Division of Licensee Performance and
Quality Evaluation, NRR

A. Licensee Activities

The licensee operated Unit 1 with an availability factor of 51.4%. The assessment period started with the unit in end-of-cycle coastdown at 86.5% power. The refueling outage, which was scheduled to begin November 12, 1989, started a day early due to a turbine control

system initiated scram. The outage lasted 156 days, 86 days longer than planned. Recirculation system piping weld overlays and Appendix R modifications were the primary delay contributors. Significant valve and motor operator maintenance and modifications were also completed. The unit now has 97% barrier fuel, eliminating any preconditioning requirements during the current fuel cycle. Following the refueling outage, Unit 1 underwent normal power operations except when it was taken off line for twenty days in June 1989 to replace the reactor core isolation cooling injection valve and to replace the 1A core spray motor.

Unit 2 started the assessment period at 100% power and ended at 83% end-of-cycle coastdown to the September 1989 refueling outage. There were two forced outages, both involving equipment failure, with one being complicated by personnel error. Setpoint drift in a feedwater control system inverter resulted in a scram, leading to a three day outage in November 1988. A trip of both recirculation pumps, due to a loss of the start-up auxiliary transformer, required operators to manually scram the reactor. This resulted in an eleven day outage in June 1989. The licensee operated the unit with a 96.1% availability factor.

The licensee completed several self-assessments during the evaluation period. A third party consultant, Cresap, reviewed nuclear operations at Brunswick and made recommendations to CP&L management. CP&L performed an Organizational Analysis which examined job responsibilities and functions. At the end of the assessment period, the licensee eliminated certain positions and changed their organization based on the Organizational Analysis recommendations. The Corporate Management Oversight Team reviewed station operations last period and made recommendations that were implemented by the plant this assessment period. Additionally, a major review of the design of motor-operated valves was completed and documented.

Management changes were made at the corporate and site level. All nuclear activities report to an Executive Vice President with all three CP&L nuclear sites reporting to a single Senior Vice President. Personnel reassignments included the maintenance manager, site planning and control manager, training manager, and project manager positions.

B. Direct Inspection and Review Activities

Besides the routine inspections performed by the NRC staff, special inspections were conducted as follows:

- o September 19-23, and October 3-5, 1988; ALARA team inspection to evaluate effectiveness of actions to reduce collective dose and assess managements awareness of, involvement in, and support of Brunswick's program to keep radiation doses as low as reasonably achievable (ALARA).