

SEP 15 1982

Docket Nos. 50-324, 50-325
50-261, 50-400
50-401

Carolina Power and Light Company
ATTN: Mr. E. E. Utley, Senior Executive
Vice President and Chief
Operating Officer
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

Subject: Systematic Assessment of Licensee Performance

The Nuclear Regulatory Commission has completed its periodic evaluation of the performance of your reactor facilities. As you are aware, this evaluation program, the Systematic Assessment of Licensee Performance (SALP), involves:

1. An assessment of facility performance by the NRC staff;
2. The issuance of the staff's findings in the form of a final report, the SALP Board Report;
3. A meeting with the senior staff of your company to present and discuss the Board's assessment;
4. Your response to the SALP Board's assessment (if appropriate); and
5. The resolution of your comments, if applicable, and the resultant approval and public distribution of the SALP report by the Regional Administrator.

I want to thank you for your efforts in evaluating the SALP Board Report and in providing programmatic comments for improving the SALP program. I appreciate these comments and assure you that they will receive careful evaluation in our continuing attempts to make this program more valuable. As you are aware, the Federal Register Notice delineating our revised SALP program was published for comment in March 1982. This revision was a major change to our SALP program.

As stated in our letter to you of May 21, 1982, the SALP Board Report for your facilities was developed during a period in which substantive policy changes were occurring in our SALP program. Your SALP Board Report, covering the period July 1, 1980 through December 31, 1981, was completed prior to the publication of the revised SALP program. It is a transition report which bridges our old system with the new one. All future SALP Board Reports will be based on the new criteria as delineated in the Federal Register Notice of March 1982.

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The SALP process evaluates facility performance in both operational and construction phases as they apply to major functional areas. These areas, which are discreet subsets of overall plant performance, are termed functional areas. In accordance with NRC policy, development of the functional area ratings for your facilities was heavily dependent on the professional opinions of our inspectors, their supervisors, and the senior managers of the NRC. A rating of Category 1 is assigned only when, in the judgement of the NRC staff, little or no improvement in a functional area was attainable and a reduction of inspection activity was justified. A Category 2 rating is a staff finding that the functional area is receiving proper management attention and that the involvement of managers is evident. This Category 2 rating classifies the conduct of nuclear activities as having a proper concern for nuclear safety, and the company's resources as being properly applied. A functional area classified as Category 3 is considered to be satisfactory to assure the safety of the public and the environment; however, a Category 3 classification does identify a need for additional licensee management and NRC attention in the specific functional area.

NRC policy requires my careful review of the SALP Board Report and of your comments. In accordance with this policy, I have reviewed the SALP Board Report and your comments on that report. Based on this review, I have approved the SALP Board Report and authorize its public distribution.

The following discussions relate to my resolution of your comments and are considered to be an integral part of your SALP report:

1. Your comments regarding the Harris facility take issue with several SALP Board Report findings. I have looked into these matters as they relate to your interpretation of inspection report findings, the SALP Board Report, and the categorization of evaluated activities for several specific functional areas. I have determined that insufficient inspection activity was performed to justify a rating of Category 1 in the following functional areas: Site Preparation and Foundation, Fire Protection, and Design and Design Changes. The SALP Board Report is hereby amended such that these functional areas are rated as "Not Evaluated"; but with the recognition that these areas are considered to have had a performance level of, as a minimum, Category 2. In all other functional areas I have determined that the professional opinions of the staff are satisfactorily reflected by the SALP Board Report.

The overall performance of CP&L relative to the Harris facility, reflects favorably upon your management and onsite personnel. It is evident that management attention and involvement are present, and that resources are adequate and effective such that satisfactory regulatory performance is being achieved.

2. With regard to your Robinson facility, I have concluded that insufficient information exists to properly evaluate the functional area of Refueling Operations. The NRC SALP rating for this functional area is hereby amended from Category 2, to "Not Evaluated"; but with the under-

standing that this area is considered to have had a performance level of, as a minimum, Category 2. Additionally, the Surveillance functional area was administratively typed in error on page 23 as Category 3. The Surveillance functional area is rated as Category 2. I have made detailed inquiries regarding your other comments as they pertain to your interpretation of the SALP Board Report and to inspection report findings. After careful consideration of their merit, I have concluded that the SALP Board Report ratings accurately reflect your regulatory performance during this period.

The overall performance of your Robinson facility reflects a proper concern for nuclear safety by the plant and corporate staffs. Management attention and involvement are adequate and resources are being effectively utilized such that satisfactory regulatory performance is being achieved. Certain functional area weaknesses have been identified, however, by the SALP Board Report. You discuss in your response corrective actions which have been initiated in several areas. The NRC will increase attention in the monitoring of your activities in these areas. The ultimate effectiveness of your corrective actions will be evaluated during the course of the year and will be documented in the next SALP Report for the Robinson facility.

3. Several issues are raised in your discussion of the SALP Board's findings for the Brunswick facility. I have looked into these matters as they pertain to your interpretation of operational statistics, inspection report findings, and operating events. I have determined that the professional opinions of the NRC staff are properly reflected in the SALP Board Report.

The overall performance of your Brunswick facility is categorized as satisfactory, but with a need for increased management attention and involvement in certain functional areas as discussed in the SALP Board Report. Increased NRC attention in these functional areas is also appropriate. We will closely monitor your activities and discuss your performance in the next SALP Report. I am aware of several measures which you have already initiated and which have resulted in improved performance. I feel confident, based on recent commitments by your company, that this improvement will continue and will be reflected in the next SALP Board Report for the Brunswick facility. Additionally, certain programs which were in-place during this SALP period, but which had deficiencies in their implementation, will benefit by an additional year of operative experience and should also reflect improved performance at the next SALP Board.

In accordance with 10 CFR 2.790(a), a copy of this letter; the letter of May 21, 1982, from R. C. Lewis, SALP Board Chairman and the enclosed SALP Board Report; and the letter of July 28, 1982, from E. E. Utley responding to the SALP Board Report will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

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

Sincerely,

James P. O'Reilly
Regional Administrator

Enclosure:

1. R. C. Lewis Letter of May 21, 1982,
w/enclosure
2. E. E. Utley Letter of July 28, 1982,
w/attachment

cc: C. R. Dietz, Plant Manager
R. C. Lewis, NRC, Region II
(SALP Board Chairman)
R. M. Parsons, Project General
Manager
R. B. Starkey, Jr., Plant
General Manager

bcc: NRC Resident Inspectors (Brunswick, Harris, and Robinson)
Document Management Branch
State of North Carolina
state of South Carolina

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