



Caroline Power & Light Company

Brunswick Nuclear Project  
P. O. Box 10429  
Southport, NC 28461-0429

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DEC 6 1990

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SERIAL: BSEP/90-0795

Mr. S. D. Ebnetter, Administrator  
U. S. Nuclear Regulatory Commission  
Suite 2900  
101 Marietta Street, NW  
Atlanta, GA 30323

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 & 2  
DOCKET NOS. 50-324, 50-325  
LICENSE NOS. DPR-62, DPR-71  
INTEGRATED ACTION PLAN STATUS

Dear Mr. Ebnetter:

Enclosed is our monthly status report on the Brunswick Integrated Action Plan.

Please give me a call if you have any questions concerning this report.

Very truly yours,

R. B. Starkey, Jr., Vice President  
Brunswick Nuclear Project

WJ 12/4/90

KMC/cj  
Enclosure

cc: BSEP Resident Office  
Mr. K. B. Altman  
Mr. R. E. Carroll  
Mr. J. L. Harness  
Mr. L. I. Loflin

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Carolina Power & Light Company

Company Correspondence

Brunswick Nuclear Project

DEC 6 1990

MEMORANDUM TO: Mr. R. A. Watson  
 FROM: R. B. Starkey, Jr.  
 SUBJECT: Integrated Action Plan

As of October 31, 1990, 46 of 64 Level 1 Action Items were complete; 17 of them significantly ahead of schedule.

Attached are the Level 1 and Level 2 Integrated Action Plans, which are current through October 31. Changes from last month's report are indicated by an asterisk. Also attached are graphs which show our Level 1 and Level 2 progress against the schedule and illustrate our actual and projected schedule performance on Level 1 Action Items.

Four new Level 2 Action Items were added to G3 this month. These additions reflect actions which have been taken to address attention to detail in design engineering.

One Level 1 Action Item was completed in October, per its original schedule. Target completion dates for two Level 1 Action Items were revised in October. The target completion date for D31, "Consolidate, Update, Simplify BNP Procedures," was revised from October 31, 1990 to November 30, 1990, due to the fact that a small number of procedure revisions were still in the review process at the end of October. The target completion date for F1, "Implement Career Development and Job Rotation Process," was revised from To Be Determined to January 31, 1991. The original target completion date for this item had been June 30, 1990, but was revised in June to To Be Determined in order to provide more time for management involvement.

An Integrated Action Plan Schedule of Independent Reviews is also attached, which is current through October 31. It indicates that 35 independent reviews by CP&L personnel are complete and that 11 other independent reviews are underway.

*aw*  
 12/4/90  
 KMC/cj

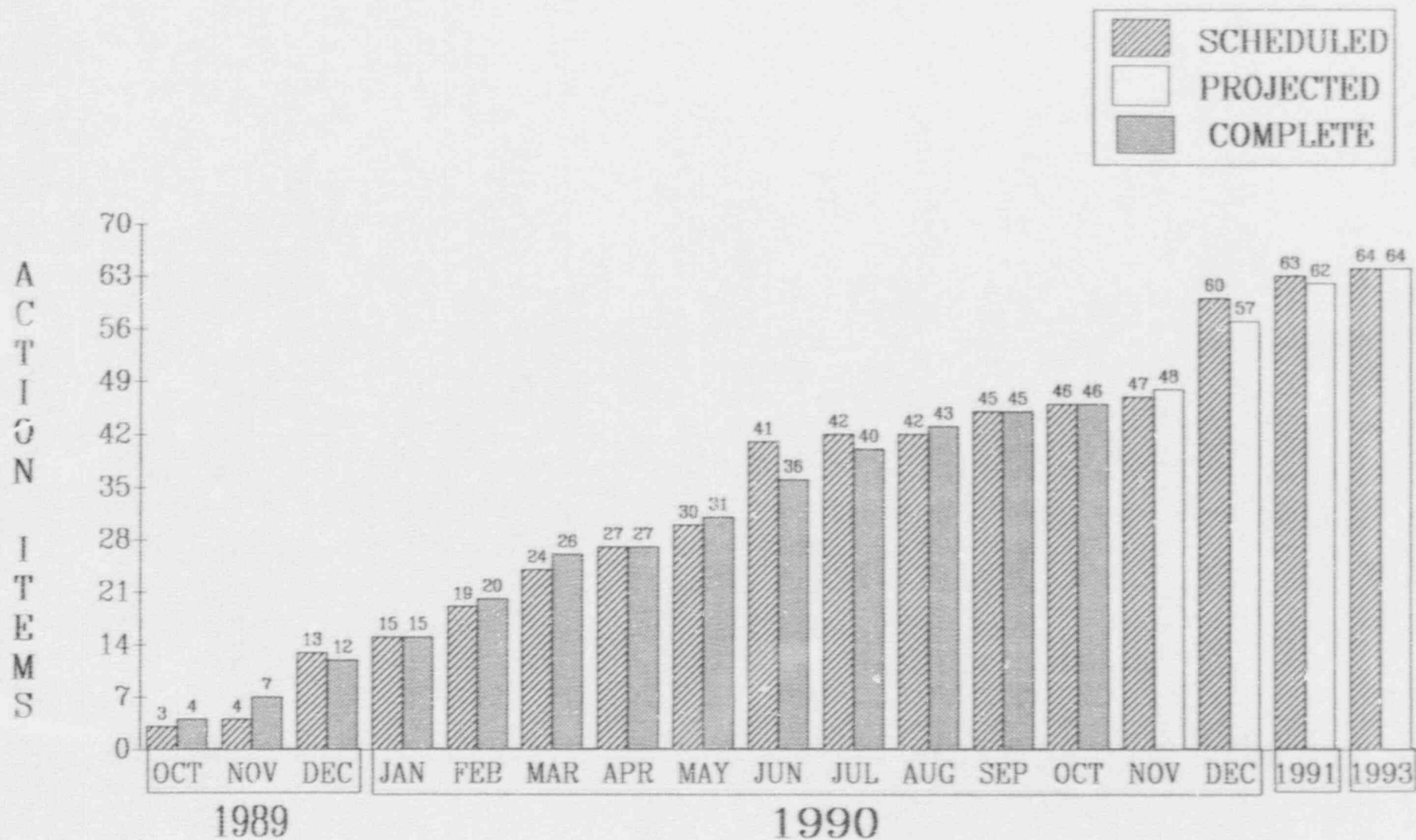
Attachment

cc: Distribution

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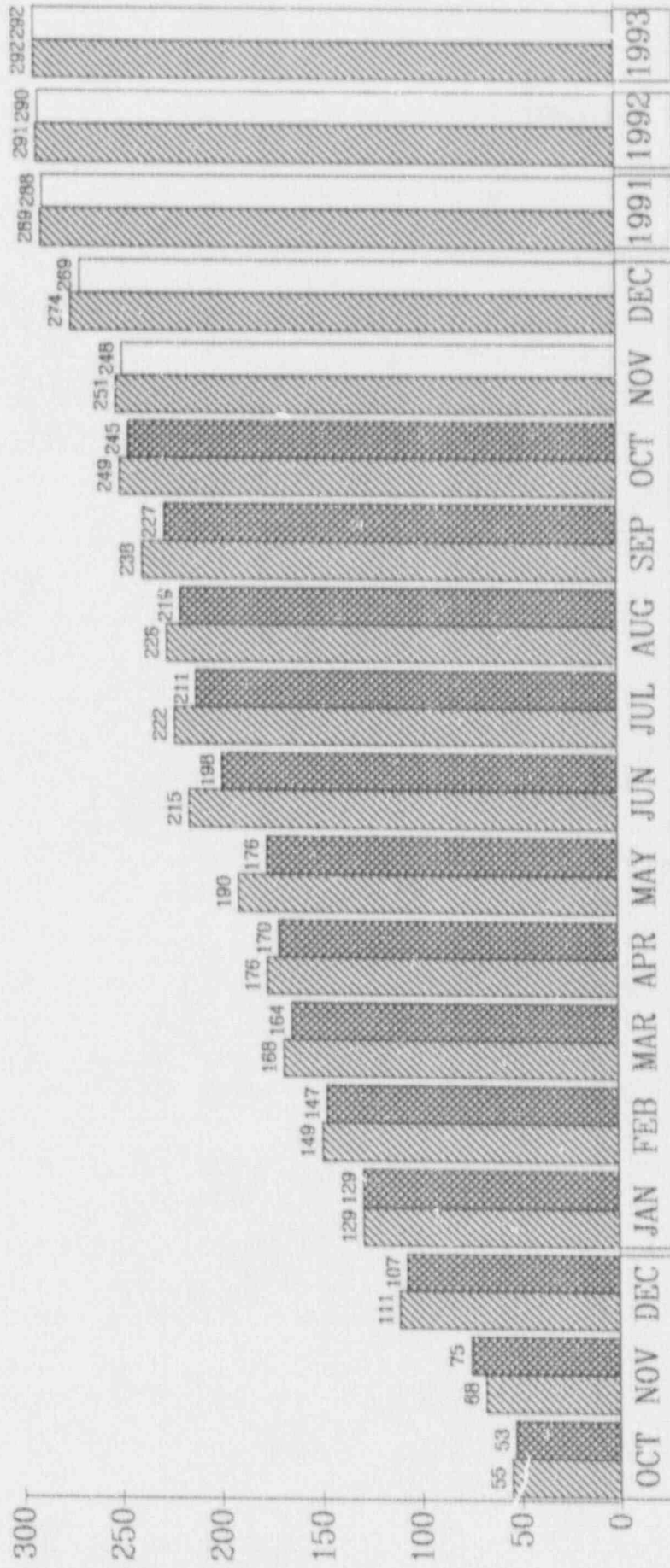
cc: Mr. H. R. Banks	Ms. T. M. Jones	Mr. R. B. Richey
Mr. R. M. Barrett	Mr. B. P. Leonard	Mr. W. W. Simpson
Mr. C. F. Blackmon	Mr. J. P. Leviner	Mr. M. S. Staton
Mr. J. M. Brown	Mr. A. M. Lucas	Mr. J. G. Titrington
Ms. K. M. Core	Mr. L. H. Martin	Ms. M. S. Timberlake
Mr. C. R. Dietz	Mr. B. D. McFeaters	Mr. G. E. Vaughn
Mr. W. J. Dorman	Ms. P. D. Morris	Mr. R. L. Warden
Mr. M. W. Drake	Mr. J. W. Moyer	Mr. R. M. White
Mr. M. D. Hill	Mr. R. C. Phillips	Ms. S. V. Williams
Mr. J. R. Holder	Mr. B. R. Poteat	

# INTEGRATED ACTION PLAN LEVEL 1 STATUS





# INTEGRATED ACTION PLAN LEVEL 2 STATUS

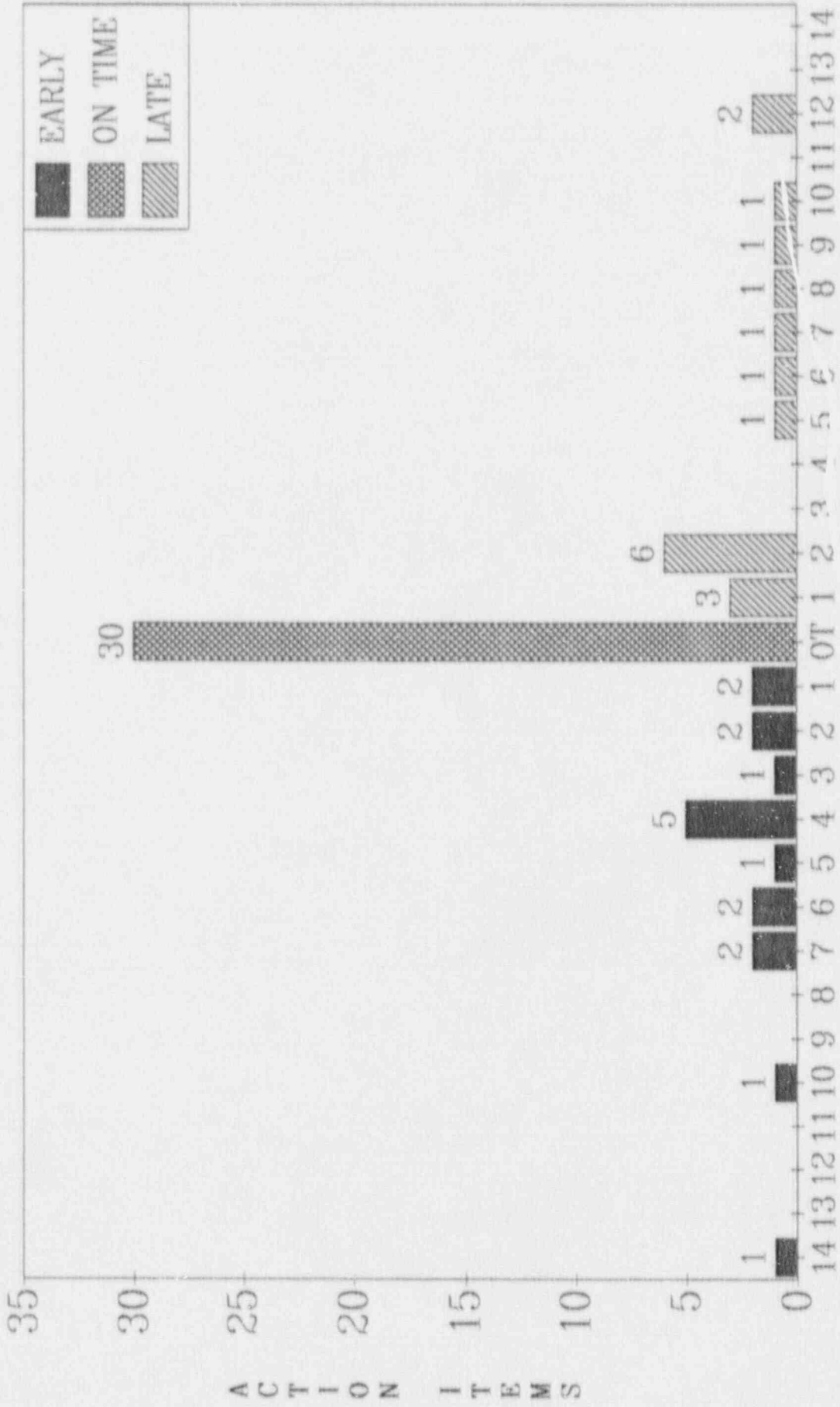


1989 1990

NOTE: TWO ITEMS WHICH WERE DESIGNATED AS "N/A" AND FOUR ITEMS WHICH WERE TRANSFERRED AND INCORPORATED INTO OTHER ACTION ITEMS HAVE BEEN DELETED FROM THE SCHEDULED AND PROJECTED TOTALS.

T A S K S

IAP LEVEL 1 SCHEDULE PERFORMANCE  
 46 COMPLETED ITEMS & 18 PROJECTED ITEMS  
 AS OF OCTOBER 31, 1990



MONTHS < = > ORIGINAL TARGET

**BRUNSWICK NUCLEAR PROJECT**  
**INTEGRATED ACTION PLAN STATUS: October 31, 1990**

<u>IAP NO.</u>	<u>ACTION ITEM</u>	<u>ORIGINAL TARGET DATE</u>	<u>CURRENT TARGET DATE</u>	<u>COMMENTS</u>
A1	Communication Strategy for Goals, Priorities, Expectations	12/31/90	Complete	
A2	Improve External Relationships	01/31/90	Complete	The CP&L/NRC Interaction Plan (revision 2) has been published and implemented.
B1	Implement Technical Support Improvements	09/30/90	Complete	A portion of the original scope of this item has been transferred to B7, Construct Permanent Office Building.
B2	Implement NED Organizational Improvements	06/30/90	Complete	
B3	Implement Nuclear Training Organizational Improvements	06/30/90	Complete	
B4	Implement Control & Administration Organizational Improvements	12/31/89	Complete	
B5	Implement Nuclear Plant Support Organizational Improvements	06/30/90	Complete	
B6	Implement Outage Management & Modifications Organizational Improvements	12/31/89	Complete	OA

\* Indicates change from previous month's report.

IAPSI

**BRUNSWICK NUCLEAR PROJECT**  
**INTEGRATED ACTION PLAN STATUS: October 31, 1990**

<u>IAP NO.</u>	<u>ACTION ITEM</u>	<u>ORIGINAL TARGET DATE</u>	<u>CURRENT TARGET DATE</u>	<u>COMMENTS</u>
B7	Construct Permanent Office Building	10/31/93	10/31/93	This item was established in September 1990, to track completion of a new facility for Technical Support and other personnel.
C1	Implement Corporate Nuclear Prioritization Process	06/30/90	Complete	Programs/processes are in place to prioritize new work and existing backlogs.
C2	Establish NED Budget Item for Generic Work	12/31/89	Complete	1990 Budget.
C3	Establish Budget & Release Process for Non-IPBS Engineering	12/31/89	Complete	
C4	Develop Long Range Planning Budgets for Emerging Issues/Regulations	12/31/90	Complete	
D1	Resolve Surveillance Test Program Questions	03/31/90	Complete	
D2.1	Improve Management of Maintenance Backlog	06/30/90	Complete	
D2.2	Strengthen Maintenance Planning Functions	06/30/90	Complete	
D3	Fine Tune MOV Maintenance Program	06/30/90	Complete	
D4	Develop Post-Maintenance Testing for ASME Code Repairs	10/15/89	Complete	

\* Indicates change from previous month's report.

IAPSI

**BRUNSWICK NUCLEAR PROJECT**  
**INTEGRATED ACTION PLAN STATUS: October 31, 1990**

<u>IAP NO.</u>	<u>ACTION ITEM</u>	<u>ORIGINAL TARGET DATE</u>	<u>CURRENT TARGET DATE</u>	<u>COMMENTS</u>
D5	Implement Recommendations of HPCI Reliability-Centered Maintenance Study	12/31/90	02/28/91	
D6	Address Service Water System Design Issues	11/30/90	11/30/90	Tied to the Unit 1 Refueling Outage. Unit 2 is complete.
D7	Confirm Design Basis for Key Brunswick Systems	12/31/91	12/31/93	Management has reviewed and approved a proactive approach which will provide a comprehensive reconstitution of the BNP safety-related system design basis. This is a major scope increase for Action Item D7.
D8	Complete Update of Corporate and Site Design Procedures	03/31/90	Complete	
D9	Implement Corrective Action Program Improvements	04/30/90	Complete	
D10	Develop and Institutionalize Corporate Corrective Action Program	12/31/90	12/31/90	
	Develop Corporate Program for Consistent Performance of Safety Reviews	02/15/90	Complete	
D12	Improve Business Planning Process	06/30/90	Complete	
D13	Review BNP Procedures for Compliance with PAM Intent	04/01/90	Complete	

\* Indicates change from previous month's report.

IAPSI

**BRUNSWICK NUCLEAR PROJECT  
INTEGRATED ACTION PLAN STATUS: October 31, 1990**

<u>IAP NO.</u>	<u>ACTION ITEM</u>	<u>ORIGINAL TARGET DATE</u>	<u>CURRENT TARGET DATE</u>	<u>COMMENTS</u>
D14	Improve Consistency of Procurement Processes by Nuclear Plants	10/01/90	Complete*	
D15	Require Nuclear Services Department Involvement in Regulatory Driven Modifications	12/31/90	12/31/90	
D16.1	Increase Role of Nuclear Plant Support in Development of Consistency among Nuclear Plants	12/31/90	Complete	
D16.2	Formalize Initiatives to Standardize Processes and Procedures	12/31/90	Complete	
D17	Increase Use of ISD's Directives and Resources	12/31/89	Complete	
D18	Submit Simulator Certification	12/31/90	02/15/91	This item delayed approximately two months due to utilization of the simulator for additional operator training, which impacted certification testing and modifications.
D19.1	Implement System for Responding to Training Requests	05/31/90	Complete	AI-11 has been written and approved.
D19.2	Provide Coordinated Response to Regulatory-related Training Requests	7/31/90	Complete	
D20	Revise Standing Instructions Procedure to Require Index Log	10/27/89	Complete	OG-01 (revision 0) dated 10/24/89.

\* Indicates change from previous month's report.

IAPSi



**BRUNSWICK NUCLEAR PROJECT  
INTEGRATED ACTION PLAN STATUS: October 31, 1990**

<u>IAP NO.</u>	<u>ACTION ITEM</u>	<u>ORIGINAL TARGET DATE</u>	<u>CURRENT TARGET DATE</u>	<u>COMMENTS</u>
D21	Review SWFCG Charter/Guides for Current Goals, Priorities	07/31/90	Complete	
D22	Implement Tagging and Labeling Improvement Program	02/28/90	Complete	AI-97 (revision 2) approved 01/09/90.
D23	Integrate PM Vibration Program with ASME Sec. XI IST Program	12/31/90	12/31/90	
D24	Implement Budgeting of Small Engineering Projects	12/31/90	Complete	
D25	Use Project Management Approach in Planning/Execution of Outages	07/31/89	Complete	
D26	Formalize Plant Work Schedule Adherence Control	12/31/89	Complete	
D27	Improve Tracking/Disposition of Temporary Repairs/Conditions to Expedite Elimination	12/31/89	Complete	
D28	Revise EOP's to Simplify and Match BWROG Guidelines	12/31/90	12/31/90	
D29	Implement NGG Guideline Re: Structure of CP&L ISI Programs, and Establishment of 6-Month Information Exercises	06/30/90	Complete	
D30	Implement Actions for Administrative Cost Containment	06/30/90	Complete	

\* Indicates change from previous month's report.

IAPSI

**BRUNSWICK NUCLEAR PROJECT  
INTEGRATED ACTION PLAN STATUS: October 31, 1990**

<u>IAP NO.</u>	<u>ACTION ITEM</u>	<u>ORIGINAL TARGET DATE</u>	<u>CURRENT TARGET DATE</u>	<u>COMMENTS</u>
D31	Consolidate, Update, Simplify BNF Procedures	09/30/90	11/30/90*	*Consolidation, elimination and update of procedures is 95% complete.
D32	Implement Brunswick Nuclear Project Department Licensed Operator Training Improvements	01/15/91	01/15/91	
D33	Implement Nuclear Services Department Licensed Operator Training Improvements	03/29/91	08/31/91	This item extended until 08/31/91 in order to accommodate additional Level 2 actions.
E1	Define, Track Operational and Management Performance; Document Goals to be Used to Manage Performance	12/31/89	Complete	
E2	Ensure Improvement Programs are Implemented/Monitored	09/30/90	Complete	
E3	Revise LOR Program, Emphasizing Effective Control Room Log Entries	01/31/90	Complete	
E4.1	Issue Integrated Audit/Surveillance Plan for BNF Engineering	12/31/90	12/31/90	
E4.2	Develop Corporate QA Performance-Based Overview Plan	12/31/90	Complete	Portions of this action item have been transferred to Item E5 because of potential for overlapping efforts.
E4.3	Adjust Audit Improvements in Progress to Address DET Conclusions	12/31/90	Complete	

\* Indicates change from previous month's report.

**BRUNSWICK NUCLEAR PROJECT  
INTEGRATED ACTION PLAN STATUS: October 31, 1990**

<u>IAP NO.</u>	<u>ACTION ITEM</u>	<u>ORIGINAL TARGET DATE</u>	<u>CURRENT TARGET DATE</u>	<u>COMMENTS</u>
E5	Analyze Methods of Independent Assessments for Performance Evaluation	12/31/89	12/31/90	Scope expanded to include development of a company-wide program to improve the quality of CP&L's nuclear oversight functions.
E6	Revise PT's for Proper Evaluation of Service Water Pump Performance	04/28/90	Complete	Revisions approved 11/24/89.
F1	Implement Career Development and Job Rotation Process	06/30/90	01/31/91*	*Development of program recommendations for management review has required more time and effort than was originally anticipated.
F2	Incorporate Quality, Safety and Cost Effectiveness Criteria in Performance Appraisal Program	06/30/90	Complete	
F3	Review Awards and Incentives; Develop Plans for Enhancements	12/31/90	12/31/90	
F4	Provide Formal Training in Business Fundamentals	03/31/90	Complete	
G1	Implement Actions to Resolve People Issues, Including Employee Suggestion System	02/28/90	12/31/90	Instead of a Brunswick-only system, a corporate program will be developed, with Brunswick as an implementation pilot. An implementation design team has been formed to develop, pilot, and evaluate this program by the end of 1990.

\* Indicates change from previous month's report.

**BRUNSWICK NUCLEAR PROJECT**  
**INTEGRATED ACTION PLAN STATUS: October 31, 1990**

<u>IAP NO.</u>	<u>ACTION ITEM</u>	<u>ORIGINAL TARGET DATE</u>	<u>CURRENT TARGET DATE</u>	<u>COMMENTS</u>
G2	Reemphasize and Encourage Support of TQ Process	03/31/90	Complete	
G3	*Improve Organizational and Individual Ownership Commitments, Including: Procedural Adherence in Operations; and Attention to Detail in Design Engineering.	03/31/90	12/30/90	*Scope expanded to include Nuclear Engineering Dept. efforts in the area of engineering design.

\* Indicates change from previous month's report.



**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
A1	CRC 1 RC 5 CRC 11	Communication Strategy for Goals, Priorities, Expectations:	Starkey BNP	Complete	
		a. Develop and document strategy for Brunswick.	Core C&A	Complete	Issued to Site Management by R. B. Starkey memo dated 02/05/90.
		b. Track and document implementation of strategy components.	Core C&A	Complete	One year of historical documentation of the com- munications strategy has been collected and organized as of the end of June.

\* Indicates change from previous month's report.

IAPS2

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
A2		Improve External Relationships:	Watson NGG	Complete	
	CRE 33	a. Centralize accountability for NRC/ INPO effectiveness.	Watson NGG	Complete	OA
	CRE 34 CRO 27 CRO 28	b. Finalize CP&L/NRC Interaction Plan.	Cutter NSD	Complete	
	CRO 29 CRO 30	c. Assign clear responsibilities, goals, and time frames for each policy and program development action in the CP&L/NRC Interaction Plan.	Cutter NSD	Complete	CP&L/NRC Interaction Plan (revision 2) has been published which assigns clear responsibilities, goals, and time frames for each policy and program development.

\* Indicates change from previous month's report.

IAPS2



**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
B1		Implement Technical Support Improvements:	Helme Tech Support	Complete	
	CRE 10	a. Clearly define and communicate mission and functions.	Helme Tech Support	Complete	The mission and functions have been defined and communicated to Technical Support Management. They are contained in ENP-01, Rev. 5, dated 02/08/90.
	CRE 11	b. Consolidate/streamline organization structure.	Helme Tech Support	Complete	OA
	CRE 12	c. Determine long-range human resource needs.	Helme Tech Support	Complete	OA
	CRE 13	d. Continue system engineering development efforts.	Helme Tech Support	Complete	ENP-606, (revision 2) was issued on February 15, 1990.
	CRE 14	e. Relocate Technical Support personnel to within the plant protected area.	Simpson C&A	Transferred	This item was transferred to B7, which was created to track construction of a new permanent office building at Brunswick, which will house Technical Support and other personnel. One-third of all Technical Support personnel are presently located within the plant protected area, including the Manager, Technical Support, and four other managers and supervisors. A Brunswick facilities plan has been developed to eliminate all temporary office facilities on site.

\* Indicates change from previous month's report.

IAPS2

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
B2		Implement Nuclear Engineering Department Organizational Improvements:	Brown NED	Complete	
	CRE 1 CRE 6	a. Complete organization and staffing of Brunswick site NED group.	Brown NED	Complete	OA
	CRE 5 CRE 7 CRE 8	b. Determine long-range human resource needs.	Brown NED	Complete	OA
	CRE 9	c. Establish a Brunswick-Raleigh NED rotation program, by developing a policy to include appropriate tasks and skills, candidate performance, schedule and temporary assignments.	Brown NED	Complete	NED policy on personnel rotation approved on February 28, 1990.
	CRE 21	d. Develop detailed and plant specific implementation plans for standardized site/NED procurement functions.	Simpson C&A	Complete	
	CRE 27	e. Transfer Brunswick EDDBS function and personnel to NED	Simpson C&A	Complete	The EDDBS function was transferred to NED in 1989, as recommended by Cresap. In early 1990, the EDDBS group was temporarily transferred back to Brunswick in order to facilitate effective implementation of an enhanced commercial grade procurement program.

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

IAPS2

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
B3		Implement Nuclear Training Organizational Improvements:	Martin Nuclear Training	Complete	
	CRA 32	a. Review activities performed at the E&E Center and plants, to identify work needing more emphasis and tasks that are not being cost effectively performed.	Martin Nuclear Training	Complete	OA
	CRA 33	b. Where appropriate, reallocate training responsibilities and personnel among nuclear program training units.	Martin Nuclear Training	Complete	OA
	CRA 34	c. Redirect organizational focus of resources remaining at the E&E Center.	Martin Nuclear Training	Complete	
	CRA 35	d. Implement procedures and practices to improve instructor utilization.	Martin Nuclear Training	Complete	
	CRA 39	e. Transfer Real-Time Training from all plant organizations to the Brunswick Training Unit, except Operations RTT.	Martin Nuclear Training	Complete	
	CRA 40	f. Address BTU use of contractors.	Martin Nuclear Training	Complete	
	CRA 41	g. Clarify training mission, roles, and responsibilities between BTU and the E&E Center.	Martin Nuclear Training	Complete	
	CRA 42	h. Resolve conflicting objectives between BTU and Brunswick Plant and industry regulators.	Martin Nuclear Training	Complete	

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

IAPS2

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
B4		Implement Control & Administration Organizational Improvements:	Simpson C&A	Complete	
	CRA 3 CRA 5	a. Clarify roles and responsibilities for completing plans and budgets.	Smith B&BP	Complete	
	CRA 23	b. Evaluate Information Services staffing needs and document in Business Plan.	George SISU	Complete	
	CRE 23	c. Transfer all site procurement engineering activities and personnel to Control & Administration.	Simpson C&A	Complete	
	CRE 24	d. Develop Procurement Engineering mission statement, job descriptions, and performance goals.	Jones Proc Eng	Complete	
	CRE 25	e. Develop plan to limit Procurement Engineering design basis responsibility consistent with the CDO concept.	Simpson C&A	Complete	
	CRE 26	f. Develop long-range staffing plan for Procurement Engineering	Jones C&A	Complete	

\* Indicates change from previous month's report.

IAPS2



**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
B5		Implement Nuclear Plant Support Organizational Improvements:	Hill NPS	Complete	
	CRA 50	a. Undertake thorough review of activities performed by NPSS cost reporting and administrative services units.	Hill NPS	Complete	OA
	CRA 51	b. Merge NPSS cost and administrative units and eliminate/downsize activities and functions not core to Company's overall objectives.	Hill NPS	Complete	OA
	CRO 24	c. Establish a stronger role for the Nuclear Plant Support Section.	Hill NPS	Complete	OA
	CRO 26	d. Staff the NPSS with individuals who have plant experience, using rotation program.	Hill NPS	Complete	
	CRA 52	e. Standardize remaining corporate nuclear support activities.	Coats	Complete	

\* Indicates change from previous month's report.

IAPS2

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
B6		Implement Outage Management & Modifications Organizational Improvements:	Holder OM&M	Complete	
	CRA 38	a. Reassign and/or eliminate training activities performed by BCU.	Kelly OM&M	Complete	
	CRE 04	b. Continue efforts to evaluate alternative methods for modification/outage support.	Kelly OM&M	Complete	

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

IAPS2



**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
B7	CRE 14	Construct Permanent Office Building:	Simpson C&A	10/31/93	This item was established on September 1990, to track construction of a new permanent office building at Brunswick, which will house Technical Support and other personnel. The scheduled target dates are preliminary and will be adjusted as more information becomes available through the site investigation and bidding processes.
		a. Develop a Brunswick Site Facilities Plan	Broadway Mgmt. Svcs.	Complete	
		b. Provide project scope and funding to the Nuclear Engineering Department, to begin site investigation and development of a request for bids.	Simpson C&A	Complete	
		c. Complete site investigation and issue requests for bids.	Fuller NED	03/31/91	
		d. Award bid for design.	Simpson C&A	05/31/91	
		e. Complete site preparation.	Simpson C&A	05/31/92	
		f. Award bid for construction.	Simpson C&A	06/30/92	
		g. Complete construction and begin relocation of personnel.	Simpson C&A	10/31/93	

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IAPS2

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
C1	CRA 6	Implement Corporate Nuclear Prioritization Process:	Wagoner OM&M	Complete	Programs/processes are in place to prioritize new items and existing backlogs.
		a. Develop guidelines/procedures for use of the prioritization process.	Wagoner OM&M	Complete	
		b. Develop guidelines/procedures for linkage between priority ranking and budget inclusion.	Wagoner OM&M	Complete	
	CRE 15	c. Finalize TQ Team efforts to develop corporate prioritization.	Wagoner OM&M	Complete	
	CRE 16	d. Adapt corporate process of prioritization of work to Brunswick.	Wagoner OM&M	Complete	Site processes now incorporate Nuclear Prioritization Process.
	CRE 17 CRE 18	e. Apply prioritization process to new work and existing backlogs.	Wagoner OM&M	Complete	

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

IAPS2

BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
C2	CRE 2	Establish A Nuclear Engineering Department Budget Item for Generic Work.	Brown NED	Complete	Accomplished as part of 1990 budgeting process.

\* Indicates change from previous month's report.

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
C3	CRE 3 CRE 18	Establish Budget and Release Process for Non-IPBS Engineering:	Wagoner OM&M	Complete	12/18/89 memo from L. V. Wagoner to R. E. Heime, re: Identifying, Scoping, and Scheduling Work through PCN-G0015A, "Small Modifications."
		a. Develop criteria for this category of project (e.g., engineering manhours, type of work, etc.)	Worth Tech Support	Complete	
		b. Estimate number of projects which will fit this category.	Worth Tech Support	Complete	
		c. Establish a budget item in 1990 Business Plan/budget.	Worth Tech Support	Complete	
		d. Develop releasing mechanism and approval levels for funds for such projects.	Worth Tech Support Wagoner OM&M	Complete	
		e. Establish a cost tracking mechanism.	Worth Tech Support Wagoner OM&M Smith B&BP	Complete	

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**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
C4	CRE 35	Develop Long-range Planning Budgets for Emerging Issues/Regulations:	Vaughn NSD	Complete	
		a. Annually, in support of long-range planning process, coordinate development/update of comprehensive cost and schedule forecast for emerging issues/regulations.	Loflin Licensing	Complete	

\* Indicates change from previous month's report.

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

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D1		Resolve Surveillance Test Program Questions:	Starkey BNP	Complete	
	a.	Develop a plan to sample the Tech Spec. data base to gauge accuracy.	Jones ONS	Complete	
	b.	Re-evaluate the Brunswick electrical distribution system for compliance with GDC-17.	Brown NED	Complete	Completed on 03/08/90.
	c.	Complete actions in response to LER 1-89-016 (stroke time testing for certain containment isolation valves.)	Starkey BNP	Complete	LER submitted 11/1/89, BSEP/89-0961.
	d.	Improve sampling plan for QA surveillance of Technical Specification requirements.	Dorman CQAD	Complete	

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

IAPS2



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D2.1	CRE 18	Improve Management of Maintenance	Warden	Complete	
	CRO 21	Backlogs:	Maintenance		
	CRO 22				
	CRO 23				
	a.	Apply the Nuclear Prioritization Process to the maintenance backlog.	Smith Maintenance	Complete	On November 6, 1989, the new prioritization system was implemented.
	b.	Improve utilization of the Automated Maintenance Management System.	Warden Maintenance	Complete	
	c.	Implement a new Maintenance Backlog Management Procedure.	Warden Maintenance	Complete	SOP 2.45, "Maintenance Work Order Management" was issued in September, 1989.

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

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D2.2	CRO 19	Strengthen Maintenance Planning Functions:	Warden Maintenance	Complete	
		a. Finalize the charter/mission statement of the Brunswick Maintenance Planning Subunit.	Musser Maintenance	Complete	
		b. Complete the position description for the Maintenance Planner/Analyst.	Musser Maintenance	Complete	
		c. Establish specific guidelines for Planner/Analyst.	Musser Maintenance	Complete	
		d. Develop or acquire a formal Maintenance Planner/Analyst Training Program. Planner/Analyst Supervisors working with representatives from the Brunswick Training Unit have developed training matrices for each planner position.	Musser Maintenance	Complete	
		e. Implement Planner/Analyst Training Program at Brunswick for existing and prospective Planner Analyst.	Musser Maintenance	Complete	
		f. Increase the amount and scope of Maintenance planning completed before scheduled outages.	Musser Maintenance	Complete	

The NRC considers this Action Item "Open."

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D3		Fine Tune MOV Maintenance Program:	Warden Maintenance	Complete	
	a.	Revise OCM-M0500 (lubrication of actuator gear boxes).	Warden Maintenance	Complete	
	b.	Review and make necessary changes to MOV testing procedures.	Musser Maintenance	Complete	
	c.	Review adequacy of MOV preventive maintenance program and scheduling.	Musser Maintenance	Complete	
	d.	Review engineering procedures for consistency.	Johnson Tech Support	Complete	

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D4		Develop Post-Maintenance Testing for ASME Code Repairs:	Helme Tech Support	Complete	
	a.	Complete development of ENP-16.12.	Helme Tech Support	Complete	
	b.	Complete development of PLP-08.	Helme Tech Support	Complete	

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D5	CRO 13 CRO 14	Implement Recommendations of HPCI Reliability-Centered Maintenance Study:	Helme Tech Support	02/28/91	HPCI engineer is on site (effective March 6, 1990).
		a. Review HPCI RCM and list recommendations, evaluate and prioritize recommendations, categorize recommendations, perform cost/benefit analysis of recommendations, and perform potential problem analysis.	Helme Tech Support	Complete	
		b. Obtain management direction on recommendations.	Helme Tech Support	Complete	The Manager - Technical Support held a meeting with the responsible System Supervisor and System Engineer to discuss the recommendations.
		c. Implement changes requiring procedure revisions only.	Helme Tech Support	12/31/90*	*MI revisions were completed by 11/01/90. Additional scope for procedure revisions (PT-9.2, OI-3.4 and a new maintenance procedure) are targeted for 12/31/90.
		d. Initiate PID's on items requiring modifications, if any.	Helme Tech Support	Complete	No PID's are to be issued, per the HPCI RCM report.
		e. Obtain vendor concurrence on recommendations affecting vendor recommendations.	Helme Tech Support	Complete*	

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D5	CRO 15	f. Initiate diesel generator RCM in conjunction with CNS SSFI on diesel generators, by performing actions in (a.) above for diesels.	Helme Tech Support	Complete*	
		g. Present results to management of HPCI work to date.	Helme Tech Support	Complete*	
		h. Establish program to review impact of HPCI RCM quarterly.	Helme Tech Support	Complete*	
	CRO 16	i. Assess value of RCM for RCIC and other safety systems.	Helme Tech Support	Complete*	
		j. Repeat actions of HPCI RCM for diesel generators, starting with (b.) above.	Helme Tech Support	Complete*	
	CRO 17	k. Present results of RCIC and other safety systems' RCM review to management with recommendations.	Helme Tech Support	Complete*	

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D6		Address Service Water System Design Issues:	Brown NED	11/30/90	
	a.	Issue final report documenting hydraulic bases for system and system compliance with the bases.	Bishop NED	Complete	Issued 12/28/89.
	b.	Complete review of SW mods. to ensure that they are encompassed by design analyses and test activities.	Bishop NED	Complete	Review completed 04/30/90. Documentation has been filed.
	c.	Complete installation of upgraded cross-tie valves.	Bishop NED	11/30/90	Tied to Unit 1 Refueling Outage. Unit 2 complete.
	d.	Complete upgrade of fourth SW pump motor.	Bishop NED	Complete	
	e.	Establish temperature monitoring program to track remaining life for SW pump motors.	Bishop NED	Complete	
	f.	Issue final SW project report.	Bishop NED	Complete	Issued 12/29/89.
	g.	Perform a safety system functional inspection (SSF1) of the SW system.	Jones ONS	Complete	

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D7		Confirm Design Basis for Key Brunswick Systems:	Brown NED	12/31/93	
	a.	Complete the United Engineers & Constructors (UE&C) and General Electric System Design Criteria Turnover Project.	Bishop NED	12/31/93	*The UE&C file turnover schedule has been brought forward from 12/31/91 to 12/31/90. The GE design basis document effort is scheduled to be completed by 12/31/91, with nine of 15 DBD's now working. The work authorization for the remaining work has been approved. The comprehensive reconstitution of the BNP Safety-Related system design basis, in the form of collated and validated design basis documents, is scheduled for completion by 12/31/93. The CP&L Licensing file search has started and is 40% complete.
	b.	Complete the UE&C Piping Design Turnover Project.	Langlois NED	12/31/91	*Schedule completion being monitored by large and small bore piping system milestone charts. One of fifteen small bore systems is complete. Six of seventeen large bore systems are complete. Next system scheduled completion date is 11/15/90.

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D7		c. Evaluate the results of the SW modification review and SSFI findings and the HPCI and SLC SSFI results, and commitment date. Management to identify and document any further necessary actions.	Brown NED Bishop NED	Complete	SSFI completed 12/20/89. The evaluation report was issued 06/28/90, meeting the commitment date. Management has reviewed the recommendations and concurred.

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D8		Complete Update of Corporate and Site Design Procedures.	Brown NED	Complete	The completion of this item resulted in instructions being issued on the superseding, cross-referencing and dispositioning of 24 procedures versus the 27 procedures previously reported.

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D9		Implement Corrective Action Program Improvements:	Harness BSEP	Complete	
	CRO 3	a. Develop a Brunswick nonconformance policy statement.	Harness BSEP	Complete	PGMM 90-002, revision 1.
	CRO 4 CRO 5	b. Establish incentives for self-identification of nonconformances.	Harness BSEP	Complete	PGMM 90-002, revision 1.
		c. Issue revisions of PLP-04 which 1) lower the threshold levels, 2) improve trending, and 3) improve training.	Moyer Operations	Complete	PLP-04, revision 3 issued March 30, 1990.
	CRO 6 CRE 32	d. Complete additional training on PLP-04.	Moyer Operations	Complete	
		e. Identify Brunswick corrective action program coordinator.	Harness BSEP	Complete	
		f. Identify a senior Human Performance Evaluation System (HPES) coordinator at Brunswick.	Harness BSEP	Complete	
		g. Issue PLP-06, System Engineer Program.	Helme Tech Support	Complete	

The NRC considers this Action Item "Open."

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D10		Develop and Institutionalize Corporate Corrective Action Program:	Watson NGG	12/31/90	Nuclear Generation Group is meeting with task force members periodically and providing guidance.
	a.	Establish a group task force to develop the corporate Corrective Action Program.	Watson NGG	Complete	
	b.	Complete task force assignment.	Burkhart NPS	12/31/90	Activity of Task Force is continuing on track, as stated above.

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D11		Develop Corporate Program for Consistent Performance of Safety Reviews:	Martin Nuclear Training	Complete	
	a.	Complete development of a corporate program to ensure a consistent method for performing safety reviews (10CFR50.59), incorporating the best features from CP&L's three nuclear sites and supporting organizations, and NUMARC guidance.	Lawford CNS	Complete	Program Manual approved on February 14, 1990.
	b.	Procedure development, training, and implementation of the program.	Martin Nuclear Training	Complete	240 on-shift personnel were trained as safety reviewers. This program will be used on an ongoing basis to support outage needs and to compensate for attrition from the qualified population.

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D12		Improve Business Planning Process:	Simpson C&A	Complete	
	CRA 1	a. Formalize the process for initiating and finalizing budget and business plan targets.	Smith B&BP	Complete	
	CRA 2	b. Enhance the business planning process to clarify the "roll down" from the long-range plan and "roll into" the budget.	Simpson C&A	Complete	
	CRA 10	c. Ensure that business plans and budgets are receiving appropriate attention.	Simpson C&A	Complete	
		d. Ensure contents of business plans are appropriately communicated.	Smith B&BP	Complete	
		e. Improve consistency between the business plan, the long-range plan, and the backlog of modification projects.	Simpson C&A	Complete	
	CRA 9	f. Assign budget and cost control responsibilities for corporate programs to support departments.	Simpson C&A	Complete	

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D13		Review BNP Procedures for Compliance with PAM Intent:	Hill NPS	Complete	
	a.	Develop list of criteria to utilize in procedure review.	Frazier/Daniels NPS	Complete	
	b.	Obtain copies of recently issued procedures (since 7/1/89) and perform review.	Daniels NPS	Complete	Report issued 12/28/89.
	c.	If deviations of significance exist, recommend corrective actions to bring procedure development in compliance.	Simpson C&A	Complete	Response to report issued February 27, 1990.

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

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D14	CRE 20 CRE 22	Improve Consistency of Procurement Processes by Nuclear Plants:	Hill NPS	Complete*	*See M. D. Hill memo 10/08/90 and R. A. Watson memo 10/05/90 in IAP file.
		a. Assign Manager, Corporate Nuclear Technical Support to manage tasks a through h.	Hill NPS	Complete	Assigned task 11/17/89.
		b. Identify all related and overlapping Cresap, DET, and IAP recommendations and other regulatory or Company activities.	Waldorf NPS	Complete	
		c. Summarize results of "b" and provide for management review.	Waldorf NPS	Complete	
		d. Interview individually affected NGG managers and Senior VP, NGG, to obtain management expectations in view of their review of summarized results in "c".	Waldorf NPS	Complete	
		e. Summarize interview results and transmit to interviewees.	Waldorf NPS	Complete	
		f. Develop a definitive set of management objectives based on the expectations gathered during the interviews.	Waldorf NPS	Complete	
		g. Present objectives to NGG dept. heads and Sr. VP, NGG, and obtain feedback on needed changes and endorsement of agreed-to objectives.	Waldorf NPS	Complete*	

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D15	CRE 36	Require NSD Involvement in Regulatory-Driven Modifications:	Vaughn NSD	12/31/90	
		a. Develop NSD/NED interface document to ensure up-front, continued, and close-out involvement of NSD.	Loflin/Licensing Lucas/NED	Complete	Interface document signed and issued July 11, 1990.
		b. Revise NSD and NED work flow procedures, as necessary.	Loflin/Licensing Lucas/NED	12/31/90	*NED draft guideline developed.

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D16.1	CRE 19 CRO 25	Increase Role of NPS in Development of Consistency Among Nuclear Plants:	Cutter NSD	Complete	
		a. Direct NPS to identify, cost justify, and pursue opportunities to achieve consistency among the nuclear projects, where warranted.	Cutter NSD	Complete	OA
		b. Direct NPS to provide focused direction to Operations, Maintenance, Technical Support, and Outage managers at the 3 nuclear sites.	Cutter NSD	Complete	OA
		c. Specify within the NPS Business Plan those factors that will be targeted for assessment or surveillance during the year.	Hill NPS	Complete	M. D. Hill memo NPSS-90-318 dated 05/23/90 - "Brunswick Integrated Action Plan."

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D16.2	CRE 19 CRE 38	Formalize Initiatives to Standardize Processes and Procedures:	Vaughn NSD	Complete	
		a. Assign NPS the responsibility for standardizing processes.	Cutter NSD	Complete	
		b. Develop an action plan that identifies major candidate processes, and schedules evaluations.	Hill NPS	Complete	M. D. Hill memo NPSS-90-318 dated 5/23/90, "Brunswick Integrated Action Plan"
		c. Assemble teams to conduct evaluations and make recommendations.	Hill NPS	Complete	Each evaluation action plan establishes the "team" or manager responsible for the conduct of that evaluation.

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D17	CRA 24	Increase use of ISD's Directives and Resources:	Simpson C&A	Complete	
		a. Establish SISU as point of coordination for information system resource justification.	George SISU	Complete	
		b. Utilize ISD guidelines for hardware and software requisition/replacement.	George SISU	Complete	
		c. Establish SISU as point of coordination for ISD-sponsored training.	George SISU	Complete	
	CRA 25	d. Formalize activities of site computer users forum.	George SISU	Complete	
		e. Ensure that BNP personnel are aware of the resources available through SISU.	George SISU	Complete	

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D18		Submit Simulator Certification:	Leonard* BTU	02/15/91	
	a.	Integrate and complete the test program for the upgraded boiler/core models.	Geise BTU	Complete	
	b.	Complete test program required for certification.	Geise BTU	11/15/90*	*This target date was mistakenly listed as 11/15/91 in previous reports.
	c.	Complete document to support certification.	Geise BTU	01/01/91	
	d.	Submit certification package to management for review.	Geise BTU	01/15/91	
	e.	Submit package to NRC.	Geise BTU	02/15/91	

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D19.1	CRA 36	Implement System for Responding to Training Requests:	Martin Nuclear Training	Complete	
		a. Provide for coordination of requests through a single point of contact; develop criteria for screening, establish committee for review, and integrate reviews into periodic meetings.	Martin Nuclear Training	Complete	Administrative Procedure, AI-11 has been approved.
		b. Create mechanism for transfer of funds from plant to training section for expanded training scope or requests for new services.	Martin Nuclear Training	Complete	

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D19.2	CRA 37	Provide Coordinated Response to Regulatory-Related Training Requests:	Leonard* BTU	Complete	
		a. Develop regulatory commitment data base for training activities: match requesting agency with request and company response, update data base interactively to ensure it contains a living history of responses.	Leonard* BTU	Complete	
		b. Establish mechanisms to screen new regulatory-related requests against past initiatives: ensure that responses to regulatory agencies take into account historical commitments.	Leonard* BTU	Complete	

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D20		Revise Standing Instructions Procedure to Require Index Log:	Moyer Operations	Complete	OG-01, revision 10, dated 10/24/89.
		a. Approve revised Standing Instructions.	Simon Operations	Complete	

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D21		Review SWFCG Charter/Guides for Current Goals, Priorities:	Peeler OM&M	Complete	
	a.	Review current SWFCG Process.	Peeler OM&M	Complete	
	b.	Compare with existing procedures.	Peeler OM&M	Complete	
	c.	Draft new SWFCG procedures.	Peeler OM&M	Complete	
	d.	SWFCG review new procedure.	Peeler OM&M	Complete	
	e.	AMMS process review (possible changes to support SWFCG, incorporate changes into SWFCG procedures).	Peeler OM&M	Complete	
	f.	Revise SWFCG procedures as necessary following review.	Peeler OM&M	Complete	
	g.	Approve and implement procedure.	Peeler OM&M	Complete	
	h.	Verify adequacy of new procedure.	Peeler OM&M	Complete	

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D22		Implement Tagging and Labeling Improvement Program:	Warden Maintenance	Complete	
	a.	Provide draft recommendations.	Hagewood Maintenance Titlington Operations	Complete	
	b.	Management Review.	Warden Maintenance Moyer Operations	Complete	
	c.	Appoint label coordinator and review.	Harness BSEP Warden Maintenance	Complete	
	d.	Centralize equipment and personnel.	Hagewood Maintenance Titlington Operations	Complete	
	e.	Draft procedure and interface agreement.	Hagewood Maintenance	Complete	
	f.	Labeling procedure approved, and action plan for retagging.	Hagewood Maintenance	Complete	AI-97, Rev. 2, approved 01/09/90.

The NRC considers this Action Item "Open."

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D23		Integrate Preventative Maintenance Vibration Program with ASME Sec. XI IST Program:	Helme Tech Support	12/31/90	
	a.	Approve and implement a Vibration Monitoring Procedure.	Helme Tech Support	Complete	ENP 2702.2 approved 11/28/89.
	b.	Ensure all equipment is marked, indicating points from which to take readings.	Helme Tech Support	Complete	Equipment will be marked as baseline data is taken in order to reduce radiation exposure.
	c.	Purchase data collector instrumentation to be used to collect the vibration data.	Helme Tech Support	Complete	
	d.	Provide Real-Time Training to Auxiliary Operators on operation of data collectors.	Helme Tech Support	Complete	
	e.	Develop reference values and baselines to establish the initial points and determine the "alert" and "required action" ranges.	Helme Tech Support	12/31/90	
	f.	After establishing mark points and ranges, revise PT's accordingly.	Helme Tech Support	12/31/90	Upon completion of the PT revisions this item will be closed.

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D24		Implement Budgeting of Small Engineering Projects.	Helme Tech Support	Complete	

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D25		Use Project Management Approach in Planning/Execution of Outages.	Moore OM&M	Complete	
	CRO 20	a. Adopt a modified project management approach to planning and executing unit outages.	Moore OM&M	Complete	

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D26	CRO 18	Formalize Plant Work Schedule Adherence Control:	Harness BSEP	Complete	
		a. Issue a policy statement that establishes as a goal Maintenance supervisors scheduling 80% of their manpower on the weekly schedule developed by the Site Work Force Control Group (SWFCG).	Harness BSEP	Complete	Reference PGMM 89-003 dated 12/14/89.
		b. Establish a practice of holding accountable anyone who makes a decision to interrupt or postpone a scheduled job.	Harness BSEP	Complete	Reference PGMM 89-003 dated 12/14/89.
		c. Direct the SWFCG to issue weekly to Section/Unit Managers an annotated copy of the previous week's schedule that shows for those scheduled jobs which were interrupted or not started: reason for the decision, person who made decision, number of manhours diverted to other work, and impact on plant.	Holder OM&M	Complete	SOP-2.41, rev. 2, 01/22/90, addresses this accountability and documents per Attachment A of the SOP.

\* Indicates change from previous month's report.

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D27	CRE 18 CRO 10 CRO 11 CRO 12	Improve tracking/disposition of temporary repairs/conditions to expedite elimination:	Helme Tech Support	Complete	
		a. Identify temporary conditions that require tracking and disposition at BNP.	Helme Tech Support	Complete	The types of conditions which are termed as "temporary conditions" have been identified. The definition will be formalized in PLP-011, the Tracking of Plant Temporary Conditions.
		b. Designate a unit manager to track each type of temporary condition.	Harness BSEP	Complete	
		c. Establish a priority for close-out efforts through application of the site-wide nuclear plant prioritization system.	Helme Tech Support	Complete	Temporary conditions are prioritized using BSP-36. Review and closeout will occur routinely at the monthly PNSC meeting.
		d. Assign responsibility for each item, with completion dates assigned.	Harness BSEP	Complete	
		e. Track performance against targets: report status monthly to BNP Section/ Project management; include assessment of schedule deviations/technical problems with corresponding corrective actions; assess the significance of backlog quarterly; and adjust priorities accordingly.	Helme Tech Support	Complete	This item was reported complete in March 1990, but was re-opened as a result of an independent internal review. Revision 1 of PLP-011 was approved by the PGM on August 13, 1990. Section 6.3 has been added to more explicitly define the scope of PNSC.

\* Indicates change from previous month's report.



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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D27		f. Proceduralize program to track, disposition and control temporary repairs.	Helme Tech Support	Complete	
		g. Incorporate into applicable BNP procedures: committee review/ approval of temporary conditions; prioritization of close-outs; requirement to develop detailed support for each extension request; and backlog significance assessment.	Helme Tech Support	Complete	Revision 1 of PLP-011 was approved by the PGM on August 13, 1990. Section 6.2 was added, which requires that extensions of temporary condition due dates be approved by the PGM. The temporary condition extension request (Form 2) is required to document the justification for an extension.

\* Indicates change from previous month's report.

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D28		Revise EOP's to Simplify and Match BWROG Guidelines:	Moyer Operations	12/31/90	Work in progress; on target.
	a.	Prepare PSTG.	Ahern Operations	Complete	Reference OI-37 (draft).
	b.	Prepare writer's guide.	Ahern Operations	Complete	Reference OI-28, rev. 14, dated 12/18/89.
	c.	Write procedures.	Ahern Operations	Complete	Draft procedures have been placed in IAP file.
	d.	Preliminary verification.	Ahern Operations	Complete	
	e.	Preliminary validation	Ahern Operations	Complete	
	f.	Incorporate changes.	Ahern Operations	Complete	
	g.	Final verification and validation.	Ahern Operations	Complete	
	h.	Training.	Ahern Operations	Complete	
	i.	Follow-up training, if required.	Ahern Operations	12/31/90	Additional training to be conducted in the next LOR cycle, Oct. 22 - Nov 23.
	j.	Incorporate changes, approve.	Ahern Operations	12/31/90	

\* Indicates change from previous month's report.

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**BRUNSWICK NUCLEAR PROJECT  
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10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D29		Implement NGG Guideline Re: Structure of CP&L ISI Programs, and Establishment of 6-month Information Exchanges:	Hill NPS	Complete	
	a.	Assign individual within Corporate Nuclear Technical Support Unit to manage this task.	Waldorf NPS	Complete	
	b.	Assign individual from designated departments to participate and support this task: BNP, HNP, RNP, NED.	Dept. Mgrs BNP/HNP/RNP NED	Complete	
	c.	Assigned individuals meet to establish the desired "basic structure" of CP&L's ISI programs (responsibility and organization structure).	Bauer NPS	Complete	
	d.	Summarize desired structure and identify any inconsistencies between nuclear project departments with recommendations as to final structure.	Bauer NPS	Complete	
	e.	Obtain Senior Management decision on recommendations.	Hill, NPS Cutter, NSD Watson, NGG	Complete	
	f.	Draft NGGG and action steps for implementation for each affected department.	Assigned NPS Task Manager and assigned support personnel	Complete	Items f. through j. revised due to reeval- uation of recommendations by Senior Management.
	g.	Transmit Nuclear Generation Group Guideline for approval.	Frazier NPS	Complete	

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D29		h. Transmit action steps for approval.	Hill NPS	Not Applicable	See memo dated 06/26/90 from M. D. Hill to W. W. Simpson, subject: IAP Item D29.
		i. Approve Nuclear Generation Group Guideline.	Designated Dept. Mgrs & Watson, NGG	Complete	Guideline was approved on July 16, 1990.
		j. Approve action steps for implementing steps as called for in Implementation guideline.	Designated Dept. Mgrs & Watson, NGG	Not Applicable	See memo dated 06/26/90 from M. D. Hill to W. W. Simpson, subject: IAP Item D29.

\* Indicates change from previous month's report.

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D30		Implement Actions for Administrative Cost Containment:	Simpson C&A	Complete	
	CRA 7				
	CRA 11	a. Eliminate/consolidate financial reports and improve accounting and financial reporting processes.	Boyte CC&A	Complete	
	CRA 12				
	CRA 15				
	CRA 13	b. Evaluate and recommend cost containment methodologies.	Boyte CC&A	Complete	
	CRA 14	c. Eliminate/minimize performance of financial functions within nonfinancial units.	Simpson C&A	Complete	OA
	CRA 16	d. Identify and eliminate accounting process inefficiencies.	Boyte CC&A	Complete	
	CRA 26	e. Improve contracting practices.	Gray M&CS	Complete	
	CRA 27				
	CRA 28				
	CRA 29				
	CRA 31				
	CRA 17	f. Improve effectiveness of secretarial/clerical support.	Willetts Office Services	Complete	
	CRA 18				
	CRA 19	g. Improve document control practices.	Kesmodel Records Mgmt	Complete	
	CRA 20				
	CRA 21				
	CRA 22				
	CRE 28	h. Re-evaluate the Equipment Database System (EDBS) development effort, and modify direction as appropriate.	Jones Proc Eng	Complete	
	CRE 29				
	CRE 30				
	CRE 31				

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D31		Consolidate, Update, Simplify BNP Procedures:	Simpson C&A	11/30/90*	
	CRE 37	a. Identify and document all site procedures, including purpose, content, administrator, and distribution.	Kesmodel Records Mgmt	Complete	Listing developed. Retained in Records Management unit.
		b. Identify and evaluate relevant administrative processes.	Kesmodel Records Mgmt	Complete	Administrative and site procedures have been revised to identify processes.
		c. Identify regulatory bases for procedures.	Kesmodel Records Mgmt	Complete	Revision 126 to Administrative procedure identifies regulatory basis.
		d. Develop evaluation schedule.	Kesmodel Records Mgmt	Complete	Evaluation to determine major candidate procedures completed.
		e. Conduct evaluations and update, consolidate, simplify, and eliminate procedures.	Kesmodel Records Mgmt	11/30/90*	*Evaluations completed. Revision to BSP-01 which established distinction between Brunswick Site Procedures and the Operating Manual has been approved. Changes to Admin procedure to address this item have been approved. Consolidation, elimination, and update of procedures is 95% complete.

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D32		Implement Brunswick Nuclear Project Department Licensed Operator Training Improvements	Harness BSEP	01/15/91	
	T 2.3.2	a. Review the Operations organization, with a focus on changes needed to reinforce team concepts, both on shift and in the simulator. Based on the review results, establish a schedule for any additional corrective actions.	Harness BSEP	Complete	The review was complete 06/90. Based on the review, an operating structure has been proposed (and approved) emphasizing team concept. Additionally, the MCR command structure has also been prestructured.
	T 2.4.3	b. Evaluate the Operations control room command structure, and based upon the review results, establish a schedule for any additional corrective actions.	Harness BSEP	Complete	Completed implementation 09/10/90. Memo to R. B. Starkey, Jr. from J. L. Harness, dated 10/10/90 documents further actions but closes this out.
	T 1.1.4	c. Issue a communication to Nuclear Generation Group managers and supervisors, stressing the importance of: ensuring a thorough transfer of information when personnel leave a position; maintaining an effective nuclear generation succession plan and rotational program; allocation of resources in a timely manner, when a key vacancy occurs; investigation and action to the reasons for personnel turnover; and the controlled timing of internal transfers of key personnel.	Simpson C&A	Complete	

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D32	T 2.3.1 T 2.3.3	d. Establish a task force to evaluate long term command and control standards, and establish a completion schedule for task force activities.	Harness BSEP	Complete	Team has been functioning and commenced active meetings in September, 1990.
	T 2.1.10	e. Review the policy for Brunswick Operations Unit observation and participation in industry activities, and revise as necessary to encourage	Harness BSEP	01/15/91	*Recommendation for OI-01 has been submitted. Revision will be complete by target date.

\* Indicates change from previous month's report.

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D33		implement Nuclear Services Department Licensed Operator Training Improvements	Leonard* BTU	08/31/91	
	T 2.1.4	a. Review the adequacy of training staffing levels, and identify near term needs.	Leonard* BTU	Complete	
	T 2.1.6 T 2.2.3 T 2.4.1	b. Increase the number of simulator training hours to a minimum of sixteen hours per quarter per licensed operator, and assess the impact of this change on the adequacy of training staffing levels.	Leonard* BTU	Complete	
	T 2.4.6	c. Revise the Licensed Operator Requalification Training Instruction to ensure operators receive adequate simulator training time in all licensed positions for which they may be examined.	Leonard* BTU	Complete*	
	T 1.2.3 T 2.2.2	d. Establish rigorous standards, performance expectations, and monitor operator performance, via reports and personal involvement, especially for the annual dynamic simulator evaluation. Periodically sample the results of simulator training to monitor operator performance. (Periodic monitoring and assistance in administering annual simulator examinations will be provided by Operations.) Place these requirements in the appropriate training instructions.	Leonard* BTU Moyer Operations	Complete*	

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
D33	T 1.2.1 T 2.2.5	e. Revise the appropriate training procedure to establish objective simulator performance evaluation criteria for both Licensed Operator Requalification and Hot License examinations, at least as stringent as the NRC test criteria.	Leonard* BTU	Complete*	
	T 2.4.4	f. Incorporate installation of an uninterruptible power supply for the simulator into the prioritized work planning process.	Leonard* BTU	12/15/90	Purchase requisition initiated for installation in 1990.
	T 1.2.2 T 2.2.6	g. Establish a remedial training program which addresses the operators' deficiencies, minimizes the disruption to Operations and Training work schedules, and provides rigorous feedback to enhance the operator training program.	Leonard* BTU	12/15/90	
	T 2.1.5	h. Review and establish long-term resource staffing needs and associated training staff requirements.	Leonard* BTU	12/31/90	
	T 2.1.3	i. Revise the responsibilities of the existing Training Advisory Committee to include a review, on a quarterly basis, of changes in operating philosophy, regulatory requirements, operator crew composition, et cetera (other than simulator changes), that might affect the training program.	Leonard* BTU	12/31/90	
	T 1.1.2 T 2.1.8	j. Improve the use of available information by establishing guidance to assure that industry information is properly analyzed, disseminated, and used to improve performance.	Leonard* BTU	01/15/91	

\* Indicates change from previous month's report.

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D33	T 1.1.3 T 2.1.9	k. Establish guidance for Brunswick Training Unit observation and participation in industry activities, and incorporate this guidance into Nuclear Training Section procedures.	Leonard* BTU	01/15/91	
	T 2.1.1	l. Enhance the process for the identification and incorporation of needed changes to the simulator training process.	Leonard* BTU	01/15/91	
	T 2.1.2	m. Establish procedural guidance which provides direction for ensuring that simulator modifications are properly identified, and that appropriate training for these modifications is provided to licensed personnel.	Leonard* BTU	01/15/91	
	T 2.1.7 T 2.2.4	n. Incorporate scheduling of training on Emergency Core Cooling System malfunctions and interlocks into appropriate documents.	Leonard* BTU	01/15/91	
	T 2.2.1	o. Develop a self-assessment process that will be used to increase the effectiveness of the training program, based on test results at the conclusion of each Hot License Class and each year's Licensed Operator Requalification, which will serve to identify weaknesses and changes needed in the LOR and HLC programs.	Leonard* BTU	01/15/91	

\* Indicates change from previous month's report.

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D33	T 1.1.6	p. Conduct an independent evaluation, prior to the 1990 examinations, using personnel who are not directly conducting training of the Licensed Operator Requalification examination readiness, and incorporate a requirement for the independent evaluations of the Licensed Operator Requalification and Hot License examination readiness into the Brunswick Training Instructions.	Leonard* BTU	Complete*	*Evaluation results paralleled those resulting from CP&L evaluations.
	T 2.2.5 T 2.4.2	q. Develop a formal Simulator Scenario Writers's Guide for all phases of the Licensed Operator Requalification examination, to include guidelines for the development of more challenging scenarios into the Licensed Operator Requalification examination, and to identify equipment and training aides to be used in simulator training scenarios, and to include direction in the periodic use of video and audio equipment to allow the operators to become accustomed to them.	Leonard* BTU	02/28/91	
	T 1.1.1	r. Develop self-assessment criteria that will be used to increase the effectiveness of the training program, based on test results at the conclusion of each Hot License Class and each year's Licensed Operator Requalification, which will serve to identify weaknesses and changes needed in the LOR and HLC programs. Implement the criteria in the appropriate unit and section training procedures.	Leonard* BTU	03/29/91	

\* Indicates change from previous month's report.

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D33		s. Implement scheduled improvements in operator training program procedures.	Leonard* BTU	08/31/91	*A project coordinator has been assigned to manage this improvement program. Weekly status reports are issued, and periodic status briefings are provided to project and operations managers.

\* Indicates change from previous month's report.

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E1		Define, Track Operational and Management Performance; Document Goals to be Used to Manage Performance:	Starkey BNP	Complete	
	a.	Develop preliminary department goals for 1990 - 1994.	Starkey BNP	Complete	
	b.	Direct Section Managers to develop section goals for 1990 - 1994 which support department goals.	Starkey BNP	Complete	Memo from R. B. Starkey, Jr. dated 11/29/89.
	c.	Direct Section Managers to ensure that goals are established for all levels of their organizations which support their section goals.	Starkey BNP	Complete	
	d.	Review section goals.	Starkey BNP	Complete	Section goals reviewed by 12/31/89.
	e.	Revise department, section, and lower level goals as necessary.	Starkey BNP	Complete	No revisions were deemed necessary.

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

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E2	CRO 1 CRO 2	Ensure Improvement Programs Are Implemented/Monitored:	Starkey BNP	Complete	
		a. Identify programs/initiatives requiring completion at Brunswick.	Starkey BNP	Complete	Letter dated 01/03/90 from W. W. Simpson documented that this activity was completed on 12/18/89.
		b. Designate a project manager for each project.	Starkey BNP	Complete	Letter dated 01/17/90 from R. B Starkey designated 8 project managers for the 8 improvement programs.
		c. Establish a completion plan for each project.	Starkey BNP	Complete	
		d. Establish a tracking mechanism for each project.	Starkey BNP	Complete	

The NRC considers this Action Item "Open."

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E3		Revise LOR Program, Emphasizing Effective Control Room Log Entries:	Martin Nuclear Training	Complete	
	a.	Revise LOR-SIM-GEN01 to add emphasis to log-keeping practices.	Poulk Nuclear Training	Complete	
	b.	Deliver training during Phase I LOR 1990.	Poulk Nuclear Training	Complete	

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E4.1		Issue Integrated Audit/Surveillance Plan:	Banks CQAD	12/31/90	
	a.	Identify BNP engineering activities.	Kosmatin/ Dorman CQAD	Complete	
	b.	Define QA Auditing Unit and BNP QA/QC Unit audit/surveillance responsibilities for 1990.	Kosmatin/ Dorman CQAD	Complete	
	c.	Implement BNP engineering audit/surveillance plan.	Kosmatin/ Dorman CQAD	Complete	
	d.	Evaluate results to determine if increased and more effective overview has been achieved.	Kosmatin/ Dorman CQAD	12/31/90	

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E4.2		Develop Corporate QA Performance-based Overview Plan:	Banks CQAD	Complete	Items a and b were completed as originally planned. Responsibility for the scope of items c through e has been transferred due to potential overlap with IAP Item E5, "Analyze Methods of Independent Assessments for Performance Evaluation." The development of plans for performance-based assessments is within the scope of Item E5.
	a.	First draft developed.	Whitehead/Rose/ Dorman/Baur CQAD	Complete	
	b.	Issue draft for comments.	Whitehead/Rose/ Dorman/Baur CQAD	Complete	
	c.	Resolve comments and make presentation to CQAD management.	Whitehead/Rose/ Dorman/Baur CQAD	Transferred	
	d.	Resolve comments and obtain necessary approvals.	Whitehead/Rose/ Dorman/Baur CQAD	Transferred	
	e.	Implement plan.	Whitehead/Rose/ Dorman/Baur CQAD	Transferred	

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
E4.3		Adjust Audit Improvement Plans in Progress to Address DET Conclusions:	Banks CQAD	Complete	
	a.	Identify adjustments required.	Whitehead CQAD	Complete	
	b.	Incorporate into ongoing improvement plans; create new improvement plans as necessary.	Whitehead CQAD	Complete	

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
E5		Analyze Methods of Independent Assessments for Performance Evaluation:	Banks CQAD	12/31/90	The scope of this item includes the original intent of IAP E4.2c., d., and e., which have been transferred to this Action Item.
		a. Select members for Project Quality Team to analyze nuclear evaluation and oversight functions.	Eury EVP	Complete	
		b. Gather data on industry evaluations and programs to incorporate best practices into Company programs.	Bowles/PQT CQAD	Complete	Initial data gathering complete. Additional contacts will be made if it appears beneficial.
		c. Identify desired changes in nuclear evaluation and oversight functions and attendant organizational structures.	Bowles/PQT CQAD	Complete	The Nuclear Assessment Project Quality Team report and recommendations were submitted to Senior management on August 1, 1990.
		d. Implement desired changes in nuclear evaluation and oversight functions and attendant organizational structures.	Eury EVP	12/31/90	

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E6		Revise PT's for Proper Evaluation of Service Water Pump Performance:	Moyer Operations	Complete	
	a.	Revise SW Pump PT's 1PT-24.1-1 and 2PT-24.1-2, based on Technical Support mark-up.	Mabry Operations	Complete	Revisions approved 11/24/89.

The NRC considers this Action Item "Open."

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<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
F1	CRA 43 CRA 44 CRA 45	Implement Career Development and Job Rotation Process:	Watson NGG	01/31/91*	
	CRA 46 CRC 4 CRC 10	a. Modify commitments made to Auxiliary Operators.	Watson NGG	Complete	
	CRC 14 CRC 26 CRC 29	b. Develop a job rotation and management development program.	Watson NGG	01/31/91*	*Management review of recommended program is currently underway.
	CRC 30 CRC 31 CRO 8 CRO 9	c. Incorporate use of employee involvement techniques into supervisory and managerial skills training.	Goodnight Emp. Relations	01/31/91*	
		d. Review nuclear supervisory training programs to determine adequacy and effectiveness in building management skills.	Watson NGG	01/31/91*	This task will be completed as part of b. above.
		e. Implement a senior operations (SOS and SF) personnel shift rotation program at Brunswick.	Harness BSEP	Complete*	*Completed SOS and SF rotation in 01/90. Rotated shifts again following LOR in 07/90.

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F2	CRC 12 CRC 17 CRC 18 CRC 28	Incorporate Quality, Safety and Cost Effectiveness Criteria in Performance Appraisal Program:	Starkey BNP	Complete	
		a. Evaluate the proposed CP&L performance appraisal program for applicability to Brunswick.	Simpson C&A	Complete	
		b. Develop criteria for appraisal of leadership skills.	Warden Maintenance	Complete	Presentation to Site Management made on 02/26/90.
		c. Identify other criteria for incorporation into appraisal program.	Simpson C&A	Complete	
		d. Develop performance appraisal training program for Brunswick	Simpson C&A	Complete	The training program has been developed for supervisors, which covers the leadership evaluation process, and an update of the performance appraisal program.
		e. Conduct training of Brunswick managers and supervisors.	Simpson C&A	Complete	Leadership program training completed 07/31/90.
		f. Revise position descriptions of all Brunswick personnel.	Simpson C&A	Complete	Accountabilities for quality, safety, and cost effectiveness have been incorporated into position descriptions effective 07/31/90.

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F3	CRA 8	Review Awards and Incentives	Watson	12/31/90	A corporate program is under development and will be reviewed for specific application to the Nuclear Generation Group. (Brunswick will be one of three pilot projects, beginning in December, 1990.)
	CRC 3	Possibilities and Develop Implementation	NGG		
	CRC 8	Plan for Enhancements:			
	CRC 9				
	CRC 16	a. Consider alternate rewards techniques	Watson	12/31/90	
	CRC 19	that share cost savings with	NGG		
	CRC 20	employees.			
	CRC 21				
	CRC 22	b. Consider recognition programs that	Watson	12/31/90	
	CRC 23	focus on group innovations.	NGG		
	CRC 24				
	CRC 25	c. Ensure that the performance	Watson	12/31/90	
	CRC 27	appraisal system and the merit pay	NGG		
		system are appropriately linked.			
		d. Consider methods for non-financial	Watson	12/31/90	
	recognition.	NGG			
	e. Identify training, as required, for	Watson	12/31/90		
	implementation of new rewards and	NGG			
	incentives programs.				

\* Indicates change from previous month's report.

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
F4	CRA 4 CRA 7 CRA 9 CRA 30	Provide formal Training in Business Fundamentals:	Simpson C&A	Complete	
		a. Develop budgeting and business planning course objectives and curriculum.	Smith B&BP	Complete	
		b. Identify personnel to be trained in budgeting and business planning and schedule class.	Smith B&BP	Complete	
		c. Conduct budgeting and business planning classes.	Smith B&BP	Complete	
		d. Develop contract administration course objectives and curriculum.	Gray M&CS	Complete	Memo BSEP/89-1103, 12/13/89, from C. H. Gray to Plant Management Group.
		e. Identify personnel to be trained in contract administration classes.	Gray M&CS	Complete	
		f. Conduct contract administration training.	Gray M&CS	Complete	

\* Indicates change from previous month's report.

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
G1	CRC 2 CRC 6 CRC 7	Implement Actions to Resolve People Issues, Including an Employee Suggestion System:	Simpson C&A	12/31/90	Instead of a Brunswick-only System, a corporate program will be developed, with Brunswick as an implementation pilot. An implementation design team has been formed to develop, pilot, and evaluate this program by the end of 1990.
	CRC 13	a. Establish a system for employees to make suggestions to management.	Simpson C&A	12/31/90	
		b. Provide for effective follow-up by management to suggestions.	Simpson C&A	12/31/90	
		c. Ensure that cost-effectiveness is the key focus of the suggestion system.	Simpson C&A	12/31/90	

\* Indicates change from previous month's report.



**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
G2	CRA 47 CRA 48	Re-emphasize and Encourage Support of TQ Process:	Simpson C&A	Complete	
		a. Evaluate status of management TQ training and development needs.	Core C&A	Complete	Memo to W. W. Simpson from K. M. Core, 01/18/90, "Status of Management TQ Training Needs."
	CRA 49 CRC 15	b. Develop communication program for middle management, re-emphasizing importance of the Total Quality program.	Core C&A	Complete	

The NRC considers this Action Item "Open."

\* Indicates change from previous month's report.

IAPS2

**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
G3	CRO 7	*Improve Organizational and Individual Ownership Commitments, Including Procedural Adherence in Operations, and Attention to Detail in Design Engineering.	Moyer Operations Brown* NED	12/30/90	*Action Items G3i, j, k, and l were added to the integrated Action Plan this month, however all were completed in months prior to October.
		a. Survey operators' attitudes.	Titrington Operations	Complete	
		b. Initiate contract request for procedure writers.	Titrington Operations	Complete	
		c. Approve funds and contract for procedure writers.	Moyer Operations	Complete	
		d. Organize review and schedule OI-28 backlog reduction.	Titrington Operations	Complete	
		e. Monitor backlog reduction.	Titrington Operations	Complete	Reports are issued monthly. A June report was issued.
		f. Perform second operator survey.	Titrington Operations	Complete	
		g. Compare results of survey and provide recommendations.	Titrington Operations	Complete	
		h. Complete reduction of backlog.	Titrington Operations	12/30/90	Work in progress; on target.

\* Indicates change from previous month's report.



**BRUNSWICK NUCLEAR PROJECT  
LEVEL 2 IAP**

10/31/90

<u>IAP NO.</u>	<u>REF.</u>	<u>ACTION ITEM</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>	<u>COMMENTS</u>
	i.	*Perform a statistical assessment of the causes of the field revisions of a sample of 12 plant modifications	Brown* NED	Complete*	*The 1989 statistical assessment determined that 9% of the field revisions involved design errors, but none which would propagate through the mod. to cause an unresolved safety question.
	j.	*Develop and implement a program for systematically reviewing field revisions.	Brown* NED	Complete*	*Program ongoing, per NED Guideline E-17.
	k.	*Revise the quality assessment guideline to include criteria for field revision reviews.	Brown* NED	Complete*	*Ref. NED Guideline E-17, Rev. 2, dated 02/28/90.
	l.	*Review the Unit 2 B208R1 outage field revisions, using E-17 criteria.	Brown* NED	Complete*	*The assessment of 617 field revisions to 45 plant mods. showed that the number of design-related field revisions continues to be a low percentage of the total number of field revisions.

\* Indicates change from previous month's report.

IAPS2

INTEGRATED ACTION PLAN  
 SCHEDULE OF INDEPENDENT REVIEWS  
 October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
A1	Communication Strategy for Goals, Priorities, Expectations	Audit Services	August 1990	Complete
A2	Improve External Relationships	Corporate QA	May 1990	Complete
B1	Implement Technical Support Improvements	Audit Services	May 1990 August 1990 December 1990*	Rescheduled from November to December due to resource constraints*
		Corporate QA*	December 1990*	
B2	Implement NED Organizational Improvements	Management Services	July 1990	Complete
		Corporate QA*	December 1990*	
B3	Implement Nuclear Training Organizational Improvements	Management Services	December 1990	Underway
B4	Implement Control & Administration Organizational Improvements	Management Services	December 1990	Underway
B5	Implement Nuclear Plant Support Organizational Improvements	Management Services	July 1990	Complete

\* Indicates a change from previous month's report.

\*\*Schedule subject to change based upon availability of resources and shifting priorities.

INTEGRATED ACTION PLAN  
 SCHEDULE OF INDEPENDENT REVIEWS  
 October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
B6	Implement Outage Management & Modifications Organizational Improvements	Audit Services	August 1990	Complete
B7	Construct Permanent Office Building	To be Determined	1993	
C1	Implement Corporate Nuclear Prioritization Process	Management Services	August 1990	Complete
		Corporate QA*	December 1990*	
C2	Establish NED Budget Item for Generic Work	Management Services	May 1990	Complete
C3	Establish Budget & Release Process for Non-IPBS Engineering	Management Services	December 1990	Underway
C4	Develop Long Range Planning Budgets for Emerging Issues/Regulations	Management Services	1991	Complete*
D1	Resolve Surveillance Test Program Questions	Audit Services	July 1990	Complete
		Corporate QA*	December 1990*	

\* Indicates a change from previous month's report.

\*\*Schedule subject to change based upon availability of resources and shifting priorities.

INTEGRATED ACTION PLAN  
 SCHEDULE OF INDEPENDENT REVIEWS  
 October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
D2.1	Improve Management of Maintenance Backlog	Management Services	July 1990	Complete
D2.2	Strengthen Maintenance Planning Functions	Management Services	July 1990	Complete
D3	Fine Tune MOV Maintenance Program	BNP Site QA	To be determined*	On hold, pending CP&L's response to NRC questions*
D4	Develop Post-Maintenance Testing for ASME Code Repairs	BNP Site QA	July 1990	Complete
D5	Implement Recommendations of PPCI Reliability-Centered Maintenance Study	BNP Site QA	April 1991	
D6	Address Service Water System Design Issues	BNP Site QA	February 1991	
D7	Confirm Design Basis for Key Brunswick Systems	BNP Site QA	March 1992	
D8	Complete Update of Corporate and Site Design Procedures	Audit Services Corporate QA*	May 1990 December 1990*	Complete

\* Indicates a change from previous month's report.

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INTEGRATED ACTION PLAN  
 SCHEDULE OF INDEPENDENT REVIEWS  
 October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
D9	Implement Corrective Action Program Improvements	BNP Site QA	March 1991	This item has been partially reviewed. Completion of the review has been deferred until the review of D10 can be accomplished.
D10	Develop and Institutionalize Corporate Corrective Action Program	BNP Site QA	March 1991	
D11	Develop Corporate Program for Consistent Performance of Safety Reviews	BNP Site QA Corporate QA*	December 1990* December 1990*	Underway
D12	Improve Business Planning Process	Management Services	August 1990	Complete
D13	Review BNP Procedures for Compliance with PAM Intent	Audit Services	May 1990	Complete
D14	Improve Consistency of Procurement Processes by Nuclear Plants	Management Services	December 1990	Underway
D15	Require Nuclear Services Department Involvement in Regulatory Modifications	Management Services	1991	

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INTEGRATED ACTION PLAN  
 SCHEDULE OF INDEPENDENT REVIEWS  
 October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
D16.1	Increase Role of Nuclear Plant Support in Development of Consistency among Nuclear Plants	Management Services	June 1990	Complete
D16.2	Formalize Initiatives to Standardize Processes and Procedures	Management Services	July 1990	Complete
D17	Increase Use of ISD's Directives and Resources	Management Services	May 1990	Complete
D18	Submit Simulator Certification	BNP Site QA	March 1991	
D19.1	Implement System for Responding to Training Requests	Management Services	December 1990	Underway
D19.2	Provide Coordinated Response to Regulatory-related Training Requests	Management Services	December 1990	Underway
D20	Revise Standing Instructions Procedure to Require Index Log	Corporate QA	May 1990	Complete

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INTEGRATED ACTION PLAN  
 SCHEDULE OF INDEPENDENT REVIEWS  
 October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
D21	Review SWFCG Charter/Guides for Current Goals, Priorities	Management Services	August 1990	Complete
D22	Implement Tagging and Labeling Improvement Program	Audit Services	May 1990	Complete
D23	Integrate PM Vibration Program with ASME Sec. XI IST Program	BNP Site QA	January 1991	
D24	Implement Budgeting of Small Engineering Support Projects	Management Services	May 1990	Complete
D25	Use Project Management Approach in Planning/ Execution of Outages	Audit Services	August 1990	Complete
D26	Formalize Plant Work Schedule Adherence Control	Management Services	June 1990	Complete
D27	Improve Tracking/Disposition of Temporary Repairs/ Conditions to Expedite Elimination	BNP Site QA Corporate QA*	July 1990 December 1990*	Complete
D28	Revise EOPs to Simplify and Match BWROG Guidelines	BNP Site QA	March 1991	

\* Indicates a change from previous month's report.

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INTEGRATED ACTION PLAN  
SCHEDULE OF INDEPENDENT REVIEWS  
October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
D29	Implement NGG Guideline Re: Structure of CP&L ISI Programs, and Establishment of 6-Month Information Exchanges	BNP Site QA	August 1990	Complete
D30	Implement Actions for Administrative Cost Containment	Management Services	August 1990	Complete
D31	Consolidate, Update, Simplify BNP Procedures	Audit Services	December 1990*	Rescheduled from November to December due to resource constraints*
D32	Implement Brunswick Nuclear Project Department Licensed Operator Training Improvements	Corporate Nuclear Safety	April 1991	
D33	Implement Nuclear Services Department Licensed Operator Training Improvements	Corporate Nuclear Safety	September 1991	
E1	Define, Track Operational and Management Performance; Document Goals to be Used to Manage Performance	Audit Services	August 1990	Complete

\* Indicates a change from previous month's report

\*\*Schedule subject to change based upon availability of resources and shifting priorities.

INTEGRATED ACTION PLAN  
 SCHEDULE OF INDEPENDENT REVIEWS  
 October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
E2	Ensure Improvement Programs Are Implemented/Monitored	Management Services	August 1990	Complete
E3	Revise LOR Program, Emphasizing Effective Control Room Log Entries	BNP Site QA	July 1990	Complete
E4.1	Issue Integrated Audit/Surveillance Plan for BNP Engineering	Audit Services	January 1991	
E4.2	Develop Corporate QA Performance- Based Overview Plan	Audit Services	January 1991	
E4.3	Adjust Audit Improvements in Progress to Address DET Conclusions	Audit Services	August 1990	Complete
E5	Analyze Methods of Independent Assessments for Performance Evaluation	Audit Services	January 1991	
E6	Revise PTs for Proper Evaluation of Service Water Pump Performance	BNP Site QA	July 1990	Complete

\* Indicates a change from previous month's report.

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INTEGRATED ACTION PLAN  
 SCHEDULE OF INDEPENDENT REVIEWS  
 October 31, 1990

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE**	COMMENTS
F1	Implement Career Development and Job Rotation Process	Management Services	1991	Underway
F2	Incorporate Quality, Safety and Cost Effectiveness Criteria in Performance Appraisal Program	Management Services	August 1990	Complete
F3	Review Awards and Incentives; Develop Plans for Enhancements	Management Services	1991	Underway*
F4	Provide Formal Training in Business Fundamentals	Management Services	July 1990	Complete
G1	Implement Actions to Resolve People Issues, including Employee Suggestion System	Audit Services	January 1991	Revised due to change in completion date of Action Item.
G2	Reemphasize and Encourage Support of TQ Process	Audit Services	August 1990	Complete
G3	Improve Organizational and Individual Ownership Commitments, Including Procedural Adherence	Audit Services	January 1991	

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