JAN 24 1991 Docket Nos. 50-325, 50-324 License Nos. DPR-71, DPR-62 Carolina Power and Light Company ATTN: Mr. Lynn W. Eury Executive Vice President Power Supply P. O. Box 1551 Raleigh, NC 27602 Gentlemen: SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE REPORT NOS. 50-325/90-38 AND 50-324/90-38 This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) Report for your Brunswick facility which was sent to you on December 7, 1990; our meeting of December 19, 1990, at which we discussed the report; and your written response dated January 16, 1991. Enclosed is our summary of the December 19, 1991 meeting and a copy of the slides used during this meeting. Also enclosed is a revision to the Initial SALP Report and constitutes the Final SALP Report. We have reviewed your written response and find that no changes to the Initial SALP Report are needed. No reply to this letter is necessary; however, should you have any further questions concerning this matter, I will be pleased to discuss them with you. Sincerely. Stewart D. Ebneter Regional Administrator Enclosures: 1. Meeting Summary 2. SALP Slides 3. CP&L Letter dated January 16, 1991 4. Revision Sheet cc w/encls: (See page 2) 9102110087 9101 ADOCK 05000324

cc w/encls: R. B. Starkey, Jr. Vice President Brunswick Nuclear Project P. O. Box 10429 Southport, NC 28461

J. L. Harness Plant General Manager Brunswick Steam Electric Plant P. O. Box 10429 Southport, NC 28461

R. E. Jones, General Counsel Carolina Power & Light Company P. O. Box 1551 Raleigh, NC 27602

Ms. Frankie Rabon Board of Commissioners P. O. Box 249 Bolivia, NC 28422

Dayne H. Brown, Director Division of Radiation Protection N. C. Department of Environmental, Commerce & Natural Resources P. O. Box 27687 Raleigh, NC 27611-7687

H. A. Cole Special Deputy Attorney General State of North Carolina P. O. Box 629 Raleigh, NC 27602

Robert P. Gruber Executive Director Public Staff - NCUC P. O. Box 29520 Raleigh, NC 27626-0520

bcc w/encls: (See page 3)

```
bcc w/encls:
K. M. Carr, Chairman
T. M. Roberts, Commissioner
F. J. Remick, Commissioner
K. C. Rogers, Commissioner
J. R. Curtiss, Commissioner
J. M. Taylor, EDO
H. L. Thompson, Jr., EDO
R. W. Borchardt, Regional
  Coordinator, EDO
T. E. Murley, NRR
S. Varga, NRR
E. Adensam, NRR
T. Le, NRR
R. Nease, SALP Coordinator, NRR
Regional Administrators, RI, RIII
  RIV, and RV
K. Clark, RII, PAO
D. Verrelli, DRP, RII
H. Christensen, DRP, RII
R. Carroll, DRP, RII
K. Landis, Chief, TSS
NRC Resident Inspector
DRS and DRSS Branch Chiefs,
  and Section Chiefs
INPO
IMPELL
Document Control Desk
```

NRR Commend by Phone
The Del RII; DRP RII: DRP RII; DRS - De Pull DV CJulian JStohr RPrevatte DVerrelli EMerschoff. 01/23/91 01/25/91 01/43/91 01/13/91 01/23/91 RIMORA EAdens In JMilhoan 01/24/91 01/1/191

ENCLOSURE 1

MEETING SUMMARY

- A meeting was held at 10:00 a.m. on December 19, 1990, at the Brunswick Visitor's Center to discuss the SALP Board Report for the Brunswick Facility.
- B. Licensee Attendees:
 - S. H. Smith, Jr., President & CEO
 - L. W. Eury, Executive Vice President
 - R. A. Watson, Senior Vice President
 - G. Vaughan, VP Nuclear Services
 - R. Lucas, Manager, Nuclear Engineering
 - L. Loflin, Manager Nuclear Assessment Department
 - H. Banks, Manager Corporate QA Department
 - R. B. Starkey, Vice President Brunswick Project
 - J. L. Harness, Plant Manager

The list of licensee attendees above does not include the large number of CP&L employees that were present at the SALP presentation. The personnel were supervisors, plant operators, maintenance personnel, and various members of the plant staff. This large turnout was beneficial to the SALP process and is highly recommended for future presentations.

C. NRC Attendees:

- S. D. Ebneter, Regional Administrator, Region II (RII)
- E. W. Merschoff, Deputy Director, Division of Reactor Projects (DRP), RII E. G. Adensam, Director, Directorate II-1, Office of Nuclear Reactor Regulation (NRR)
- N. B. Le, Project Manager, NRR
- R. L. Prevatte, Senior Resident Inspector Brunswick, DRP, RII
- W. Levis, Resident Inspector Brunswick, DRP, RII
- D. J. Nelson, Resident Inspector Brunswick, DRP, RII
- R. E. Carroll, Jr., Project Engineer, DRP, RII
- J. F. Wechselberger, EDO Region II Coordinator

UNITED STATES NUCLEAR REGULATORY COMMISSION



SYSTEMATIC ASSESSMENT
OF
LICENSEE PERFORMANCE
(SALP)

CAROLINA PÓWER AND LIGHT COMPANY

SALP CYCLE 9

SEPTEMBER 1, 1989

THROUGH

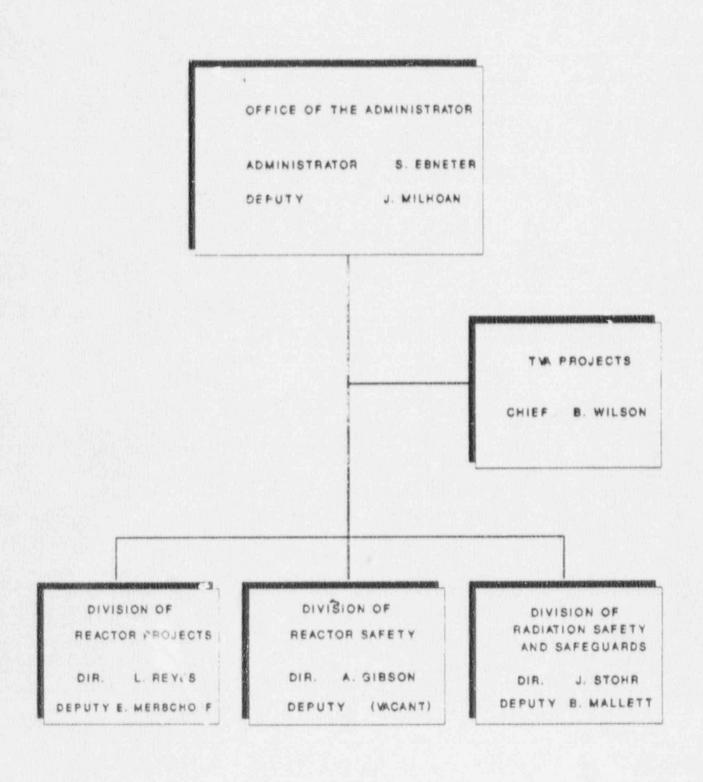
SEPTEMBER 30, 1990

BRUNSWICK 1 AND 2
SOUTHPORT, NORTH CAROLINA
DECEMBER 19, 1990

SALP PROGRAM OBJECTIVES

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

REGION II ORGANIZATION



DIVISION OF REACTOR PROJECTS CRGANIZATION

DIVISION OF REACTOR PROJECTS

DIR. L. REYES

DEPUTY E. MERSCHOFF

REACTOR PROJECTS BRANCH NO. 1

CHIEF D. VERRELLI

PROJECTS SECTION NO. 1A

CHIEF H. CHRISTENSEN

BRUNSWICK HARRIS ROBINSON

PROJECTS SECTION NO. 18

CHIEF F. CANTRELL

FARLEY GRAND GULF SUMMER

NRR ORGANIZATION

OFFICE OF NUCLEAR REACTOR REGULATION

DIR. T. MURLEY

ASSOC. DIRECTOR FOR PROJECTS

J. PARTLOW

DIVISION OF REACTOR PROJECTS I/II

S. VARGA, DIR. I/II G. LAINAS, ASST. DIR. II

E. ADENSAM, DIR. II-I T. LE, PROJECT MANAGER BRUNSWICK

DIVISION OF
REACTOR PROJECTS HI/IV/V
AND
SPECIAL PROJECTS

ASSOC. DIRECTOR FOR
INSPECTION AND
TECHNICAL ASSESSMENT

DIVISION OF ENGINEERING TECHNOLOGY

DIVISION OF OPERATIONAL EVENTS ASSESSMENT

DIVISION OF REACTOR INSPECTION AND SAFEGUARDS

DIVISION OF RADIATION
PROTECTION AND
EMERGENCY PREPAREDNESS

DIVISION OF LICENSEE PERFORMANCE AND QUALITY EVALUATION

DIVISION OF SYSTEMS TECHNOLOGY

PERFORMANCE ANALYSIS AREAS FOR OPERATING REACTORS

- A. PLANT OPERATIONS
- B. RADIOLOGICAL CONTROLS
- C. MAINTENANCE/SURVEILLANCE
- D. EMERGENCY PREPAREDNESS
- E. SECURITY/SAFEGUARDS
- F. ENGINEERING/TECHNICAL SUPPORT
- G. SAFETY ASSESSMENT/QUALITY VERIFICATION

EVALUATION CRITERIA

- 1. MANAGEMENT INVOLVEMENT AND CONTROL
 IN ASSURING QUALITY
- 2. APPROACH TO IDENTIFICATION AND RESOLUTION OF TECHNICAL ISSUES FROM A SAFETY STANDPOINT
- 3. ENFORCEMENT HISTORY
- 4. REPORTING, ANALYSIS AND CORRECTIVE ACTION OF REPORTABLE EVENTS
- 5. STAFFING (INCLUDING MANAGEMENT)
- TRAINING EFFECTIVENESS AND QUALIFICATION

AREA PERFORMANCE

CATEGORY 1

AND INVOLVEMENT IN NUCLEAR SAFETY
OR SAFEGUARDS ACTIVITIES RESULTED
IN A SUPERIOR LEVEL OF PERFORMANCE.
NRC WILL CONSIDER REDUCED LEVELS
OF INSPECTION EFFORT.

AREA PERFORMANCE

CATEGORY 2

AND INVOLVEMENT IN NUCLEAR SAFETY
OR SAFEGUARDS ACTIVITIES RESULTED
IN A GOOD LEVEL OF PERFORMANCE.
NRC WILL CONSIDER MAINTAINING
NORMAL LEVELS OF INSPECTION
EFFORT.

AREA PERFORMANCE

CATEGORY 3

AND INVOLVEMENT IN NUCLEAR SAFETY
OR SAFEGUARDS ACTIVITIES RESULTED
IN AN ACCEPTABLE LEVEL OF PERFORMANCE;
HOWEVER, BECAUSE OF THE NRC'S CONCERN
THAT A DECREASE IN PERFORMANCE MAY
APPROACH OR REACH AN UNACCEPTABLE
LEVEL, NRC WILL CONSIDER INCREASED
LEVELS OF INSPECTION EFFORT.

VIOLATION SUMMARY

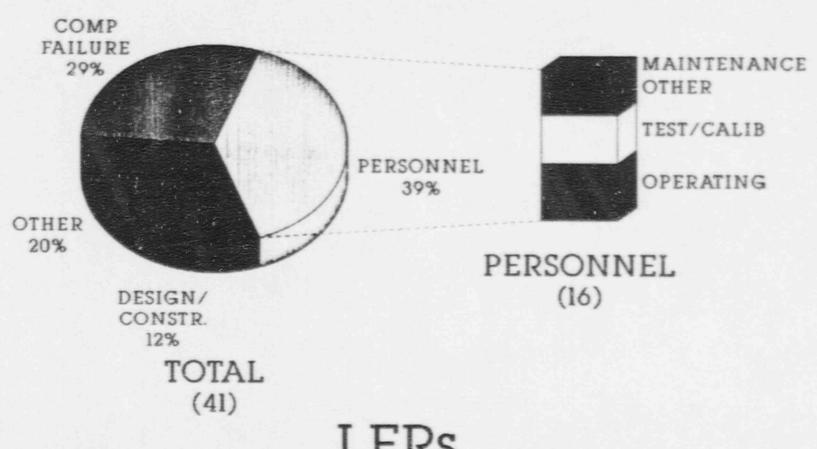
(CYCLE 9)

SEPTEMBER 1, 1989 THROUGH SEPTEMBER 30, 1990

	1	II	Ш	IV	٧
BRUNSWICK 1	0	0	2	10	0
BRUNSWICK 2	0	0	2	13	2
PER OPERATING	0	0	- 1	10	<1

BRUNSWICK

SEPTEMBER 1, 1989 - SEPTEMBER 30, 1990 (CYCLE 9)



LERs

OPERATIONS (CATEGORY 2)

OVERALL QUALITY OF OPERATIONS REMAINED GOOD

STRENGTHS

- PLANT PERFORMANCE
- PLANT CONDITION
- CORRECTIVE ACTIONS

- MANAGEMENT INVOLVEMENT
- OPERATOR PERFORMANCE
- PROCEDURES
- CONFIGURATION CONTROL

RADIOLOGICAL CONTROL (CATEGORY 2)

OVERALL PERFORMANCE IN RADIOLOGICAL CONTROLS REMAINED GOOD

STRENGTHS

- SOURCE MANAGEMENT
- DOSE MANAGEMENT
- PERSONNEL

- PROCEDURAL COMPLIANCE
- · SPENT FUEL SHIPMENTS

MAINTENANCE/ SURVEILLANCE (CATEGORY 2 AND IMPROVING)

OVERALL QUALITY OF MAINTENANCE AND SURVEILLANCE IS GOOD AND HAS SHOWN AN IMPROVING TREND THROUGHOUT THE ASSESSMENT PERIOD

STRENGTHS

- MATERIAL CONDITION
- STAFFING
- MANAGEMENT
- PROCEDURES

- WORK CONTROL
- PROCEDURAL COMPLIANCE

EMERGENCY PREPAREDNESS (CATEGORY 2)

PERFORMANCE IN THE AREA OF EP REMAINED GOOD

STRENGTHS

- · STAFFING
- EXERCISE SCENARIOS
- PERFORMANCE DURING ACTUAL EVENTS
- FACILITIES

- CORRECTIVE ACTIONS
- MAINTAINING/IMPROVING PERFORMANCE

SECURITY (CATEGORY 1)

PERFORMANCE IN THE AREA OF SECURITY HAS REMAINED EXCELLENT

STRENGTHS

- MANAGEMENT
- STAFF
- HARDWARE
- PERFORMANCE

CHALLENGES

MAINTAINING PERFORMANCE

ENGINEERING/ TECHNICAL SUPPORT CATEGORY 3

PERFORMANCE IN THIS AREA HAS DECLINED, AND ALTHOUGH ACCEPTABLE, REQUIRES ATTENTION

IMPROVEMENTS

- INTEGRATED ACTION PLAN
- DESIGN BASIS RECONSTITUTION
- TECHNICAL SUPPORT
- SIMULATOR UPGRADES

WEAKNESSES

- DESIGN CHANGES
- OPERATOR TRAINING
- USE OF CONTRACTORS

SAFETY ASSESSMENT/ QUALITY VERIFICATION CATEGORY 2

PERFORMANCE IN THIS AREA HAS REMAINED GOOD

IMPROVEMENTS

- MANAGEMENT INVOLVEMENT
- SITE INCIDENT INVESTIGATIONS
- · INTEGRATED ACTION PLAN
- · ONSITE NUCLEAR SAFETY
- QUALITY ASSURANCE
- REGULATORY COMPLIANCE ACTIVITIES

- SELF ASSESSMENT
- · CORPORATE NUCLEAR SAFETY



JAN 18 1991

SERIAL: NLS-91-007

R. A. WATEON Benter Vice Frameent Number Generation

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

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

Centlemen:

Carolina Power & Light Company (CP&L) has reviewed the Initial Systematic Assessment of Licensee Performance (SALF) Board Report forwarded by your letter of December 7, 1990 (Inspection Report Nos. 50-325/90-38 and 50-324/90-38). This report provided results from the evaluation period September 1, 1989 through September 30, 1990.

The Company appreciates the NRC's assessment of our performance in the functional areas evaluated and will use your observations and findings summarized in the report in our efforts to continue improving our overall performance. We are in agreement with the NRC finding that the overall performance of the Brunswick Plant was good, but recognize the need to continue to strive for improved performance.

As discussed with you during our December 19, 1990 public meeting, we are committed to ensuring continued improvement through implementation of the Integrated Action Plan improvement programs and initiatives. The Company will implement actions and provide the management involvement necessary to assure good performance is maintained in the functional areas cited and to enhance performance in the engineering/technical support, operator training, and self assessment functions. We are confident that theses improvements will be deconstrated during the upcoming SALP period.

Yours very truly,

R. A. Watson

WRN/wrs (\cor\salplcr)

cc: Mr. S. D. Ebreter

Mr. N. B. Le Mr. R. L. Prevatte

910230319

ENCLOSURE 4

REVISION SHEET

Page	Line	Initial Report Reads	Final Report Reads
Coversheet	2	Initial SALP Report	Final SALP Report

ENCLOSURE INITIAL SALP REPORT

U. S. NUCLEAR REGULATORY COMMISSION

BEGION 11

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

SINSPECTION REPORT NUMBER

50-325/90-38 and 50-324/90-38

CAROLINA POWER AND LIGHT

BRUNSWICK UNITS 1 AND 2

SEPTEMBER 1, 1989 - SEPTEMBER 30, 1990

ENCLOSURE FINAL SALP REPORT

U. S. NUCLEAR REGULATORY COMMISSION REGION II

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
INSPECTION REPORT NUMBER
50-325/90-38 and 50-324/90-38
CAROLINA POWER AND LIGHT
BRUNSWICK UNITS 1 AND 2
SEPTEMBER 1, 1989 - SEPTEMBER 30, 1990