



Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

SERIAL: NLS-92-098

MAR 30 1992

R. A. WATSON
Senior Vice President
Nuclear 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
SUPPLEMENTAL REPLY TO NOTICE OF VIOLATION (EA 91-158)

Gentlemen:

On January 3, 1992, the Nuclear Regulatory Commission issued a Notice of Violation (EA 91-158) for issues at the Brunswick Steam Electric Plant, Units 1 and 2. Details of the NRC inspections are provided in Inspection Report Nos. 50-325/91-26 and 50-324/91-26 dated November 22, 1991. By letter dated February 14, 1992 (Serial: NLS-92-031), Carolina Power & Light Company responded to the Notice of Violation.

Subsequently, by letter dated February 27, 1992, the Nuclear Regulatory Commission acknowledged receipt of the Company's response. The letter further stated that the February 14, 1992 response was considered incomplete in that it failed to identify and fully discuss the reasons why the corrective actions for the violations discussed in earlier enforcement action EA 91-045 did not effectively prevent the occurrences covered in the subsequent violation. The enclosure to this letter provides CP&L's supplemental reply to the Notice of Violation.

Please refer any questions regarding this submittal to Mr. M. R. Oates at (919) 546-6901.

Yours very truly,

R. A. Watson

WRM/wrm (lvpl\ea91158s.wpf)

Enclosure

cc: Mr. S. D. Ebnetter
Mr. N. B. Le
Mr. R. L. Prevatte

030028

7204030125 920330
PDR ADOCK 05000324
G PDR

LEO
111

R. A. Watson, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Betty Jean Gaung
Notary (Seal)

My commission expires: 9-23-95



ENCLOSURE

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NOS. DPR-71 & DPR-62
SUPPLEMENTAL REPLY TO NOTICE OF VIOLATION AND
PROPOSED IMPOSITION OF CIVIL PENALTY

VIOLATION I:

10 CFR Part 50, Appendix J, Criterion XVI, Corrective Actions, requires in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, effective measures were not established to promptly identify and correct deficiencies that resulted in the continuing breakdown of management control over work control activities similar to those previously identified in NRC enforcement action (EA) 91-045 which was issued on May 31, 1991, as evidenced by the examples cited within the Notice of Violation and Proposed Imposition of Civil Penalty.

SUPPLEMENTAL RESPONSE TO VIOLATION I:

The corrective actions for the violation discussed in earlier NRC enforcement action EA 91-045 may not have been completely effective in preventing the occurrences in enforcement action EA 91-158 for two primary reasons: (1) the correction of some of the noted deficiencies is an iterative and lengthy process that requires time and changing human behavior, and (2) some of the corrective actions had not been completed at the time of the occurrences identified in EA 91-158.

The following corrective actions were completed at the time of the occurrences identified in NRC enforcement action EA 91-158:

- o Please Listen Training - Completed August 1, 1991
- o BSP-50, Site Command Control and Communications Manual issued on April 8, 1991

These corrective actions helped employees focus upon their work and emphasized self checking, communications and the importance of following procedures.

The corrective actions listed below were still forthcoming at the time of the occurrences identified in NRC enforcement action EA 91-158. The actual or projected completion schedule and projected benefits are also noted.

- o Efforts to increase supervisory presence in the field were initiated in April of 1991. As indicated by the events delineated in EA 91-158, this effort has not provided all of the desired results. Ongoing enhancements to the Site Work Force Control Group (SWFCG) process are expected to alleviate some Maintenance supervisory administrative burden and allow increased in-field supervision. Site Work Force Control Group process refinements are expected to be implemented by September 30, 1992.
- o Although not requested per se in this supplemental response, please be advised that beginning in April 1992, key unit managers are being assigned an assistant on an interim basis to analyze their respective work processes, develop improvements in those processes and be a part of implementing enhancements there to. Improved work processes are expected to reduce the probability of work control deficiencies and ultimately to reduce administrative burdens in each work group and consequently provide supervision additional time for in-field oversight of work activities.
- o Periodic meetings have been established between the Vice President - Brunswick Nuclear Project and supervision on expectations, performance standards and employee coaching. This is an on-going effort and will continue as long as management considers it necessary.
- o Substantially increased Quality Control and Nuclear Assessment Department surveillances of work activities were initiated in April 1991 as an interim measure designed to supplement supervisory presence in the field until the above actions have progressed to the degree required to maintain the appropriate level of supervisory oversight.

While the actions described above have not been fully effective in preventing certain recurrences of work control issues, they have produced trends in performance in a number of areas that indicate early signs of success. Examples of improved trends are fewer personnel error Licensee Event Reports, fewer personnel error Adverse Condition Reports, lower radiation exposure, fewer contamination events and a decrease in the number of unsuccessful Emergency Safety Feature actuations.

The Company recognizes the difficulty of changing human performance in the short term and does not view the above improvement trends as evidence that our endeavors in this area are complete. Internal and external assessments have been performed, and will continue to be performed, to determine the effectiveness of corrective actions. New improvement initiatives and refinements to existing initiatives arising from these assessments include:

- o Direct on-site support from the Employee Relations Department, including a full time Organizational Development Specialist and a part time (currently 40 percent) Resources Professional, is being provided to focus attention on personnel planning and development. The Organizational Development Specialist is expected to

support this effort up to May 1993 and the Resource Professional is a permanent assignment.

- o A corporate approach to Effective Performance Management (EPM) was initiated in 1988 to focus on priority tasks, communication, evaluation, and reward. A project team was initiated in 1990. Pilot training programs were conducted in October and November of 1990. Effective Performance Management training started in 1991. Exempt and 60 percent of non-exempt company personnel have completed this training. The remainder of non-exempt personnel are expected to complete this training by end of the third quarter 1992.
- o First line supervisor assessment centers are being utilized to assist in selection of future supervisors because of a recognized need throughout the Nuclear Generation Group. The centers evaluate an individual's application of supervisory skills via scenarios. Assessment of twelve prospective supervisors has been completed since November 1991. Additional assessments are ongoing.
- o A Supervisory Development Project was initiated in December 1990. Ninety-one supervisors were surveyed in April 1991. The results of these surveys were reviewed in August 1991 and incorporated within the supervisory development training course curriculum. Course development was completed in February 1992. A pilot five week course targeting first line supervisors with a focus on teamwork and twenty-seven attributes of leadership will commence in May and August of 1992. This course is available to personnel within the Nuclear Generation Group and twenty Brunswick Plant personnel will be among the first to be trained, with approximately ten from Brunswick attending each class of twenty five scheduled to be conducted in 1992. Pilot course assessment will follow to support curriculum enhancement. This program is intended to be ongoing training.
- o A Technical Training Center to provide Maintenance and Environment & Radiation Control hands-on training was conceptualized in May 1991 and opened in March 1992. The facility includes four labs, a hands on/mock up facility, and classrooms to support realistic simulation of work activities.
- o Project Management Training, a one week course focusing on skills such as scheduling, people selection, brainstorming, etc., was initiated approximately five years ago. Two courses providing training to forty-four personnel were held in 1989, three courses providing training to sixty-five personnel were held in 1991, and two courses providing training to forty-seven personnel were held in 1992 with two additional courses planned for 1992.
- o Management Advanced Systems Training, a thirteen week course targeted for managers and senior staff, was initiated in March 1992. The second class will be held in the fall of 1992. This is ongoing training that is being initiated with two or three classes per year.

- o Nuclear Generation Group Education and Training Project was initiated in 1991 to enhance training and development in the Nuclear Generation Group. Phase One, which included visits to other plants and interviews of line and training staff personnel from the three nuclear sites, is complete. Phase Two, which was initiated in December 1991 will provide recommendations and implementation plans for actions to enhance Nuclear Generation Group employee training and development. Phase Two recommended actions will be presented to the Education and Training Steering Committee by the end of May 1992.

In summary, while it is not possible to completely eradicate occurrences due to human behavior, CP&L believes continued efforts in this area will result in a decrease in the frequency and significance of work control issues.