# Carolina Power & Light Company

Nuclear Services Department
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FEB 24 1992

SERIAL: NLS-92-050

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

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

Gentlemen:

Carolina Power & Light Company has reviewed the Initial Systematic Assessment of Licensee Performance (SALP) Board Report forwarded by your letter of December 10, 1991 (Inspection Report Nos. 50-325/91-37 and 50-324/91-37). This report provided results from the evaluation period October 1, 1990 through Novemb 2, 1991.

The Company acknowledges 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 improve our overall performance. We are in agreement with the NRC finding that the Brunswick Plant has been operated in a safe manner during the assessment period.

Your letter requested that CP&L address each of the functional areas rated as Category 3. Enclosure 1 describes our planned corrective actions to achieve improved performance in the Maintenance and Safety Assessment/Quality Verification functions.

As discussed with you during the January 23, 1992 public meeting, 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 maintenance and self-assessment functions.

Yours very truly,

G. E. Vaughn

WRM/wrm (salp1991.wf5)

Enclosure

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



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ENCLOSURE 1

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

MAINTENANCE FUNCTIONAL AREA:

A number of initiatives are being implemented to achieve sustained improvements in the area of work control:

- Enhanced Quality Control (QC) surveillance of selected maintenance activities with emphasis on work control and procedure adherence.

- The on-line scheduling/planning process of maintenance backlog and surveillance items is being transferred from the first line Maintenance supervisors to the Site Work Force Control Group (SWFCG). This will allow the supervisors more time in the field and provide for a more consistent approach to the process.

- A new Maintenance Staff manager was assigned in December 1991. The new manager was a Naval Officer and holds a Masters degree in Engineering Administration and a Bachelor of Science degree in both Mechanical Engineering and Engineering Science. Prior to this assignment, the manager worked in the Outage Management & Modification (OM&M) organization for approximately five (5) months. The manager's charter is to develop an integrated action plan for improvement of the maintenance work control process. The scope of the plan will include the Plant Services organization, the Site Work Force Control Group, the maintenance clearance center, and the operations clearance center. The anticipated date for the action plan is June 26, 1992. In support of this effort, maintenance personnel have visited the Limerick, Davis Besse, and Shearon Harris plants to identify good practices. In addition, a senior Maintenance Manager from Duke Power Company is scheduled to give a presentation at the Brunswick Plant on work control planning during the week of February 24, 1992. The good practices obtained during the visits and presentation will be utilized to improve the work control process.

- A new manager has been assigned to both the Maintenance Unit 1 Mechanical sub-unit and the Unit 1 Instrumentation and Control (I&C) sub-unit. In addition, a Nuclear Engineering Department (NED) Electrical Unit Manager has been temporarily assigned to assist both sub-unit managers, to provide coverage during their training, and to be the focal point for maintenance integration into the improved work control process mentioned in the previous paragraph.

  The Unit 1 Mechanical sub-unit manager holds a Mechanical Engineering degree and has previous experience in Technical Support. The I&C sub-unit manager is a former Naval Officer, has an Electrical Engineering Degree, and has been a member of the Outage Management & Modification organization

for approximately one year prior to this assignment. The Nuclear Engineering Department Electrical sub-unit manager assisting the Maintenance sub-unit managers was formerly an I&C manager at the Shearon Harris Plant.

- An interim, full time training coordinator has been assigned to the Maintenance Manager from the Maintenance Training area of the Nuclear Services Department. The coordinator will analyze maintenance training needs and implement improved training to ensure the training received is the training needed to increase performance effectiveness. A permanent maintenance training coordinator in the I&C and the Mechanical/Electrical areas will be assigned after the interim coordinator assignment.

- A Leatherman Leadership Survey was performed during 1991 to assess the supervisory staff. Training is currently being developed to assist supervisors who were not rated in the survey's top 25 percent. The training is scheduled to begin in mid 1992.

- Additional management training programs are scheduled to be provided in 1992. Examples of the programs include: four (4) Project Management courses to be started in February and completed in June; two (2), one month long first line supervisor training and development sessions scheduled for May and August; and five (5) Managing Relationships at Work courses scheduled in February, May, June, July, and August of 1992. Maintenance supervisor training is being improved with respect to effective on-the-job coaching.

- A Technical Training Center for the Maintenance and Environmental and Radiation Control (E&RC) groups is being readied to provide plant specific "hands on" equipment training. The center is expected to open in March of 1992. The center will house four (4) labs (i.e., chemistry, electrical, mechanical, and I&C), an I&C and craft "hands on/mock up" training facility, and classrooms.

- A pilot program has been initiated which provides four (4) certified System Engineers to the Maintenance Planning sub-unit. This program is expected to raise the level of planning expertise. Maintenance planning standards and training will be developed as part of the improved, integrated work control process action plan mentioned previously.

- The Nuclear Assessment Department (NAD) assessed work control during the Brunswick Nuclear Project Sitewide Assessment conducted from October 28 - November 15, 1991. The Nuclear Assessment Department issued the associated report on December 16, 1991. Plant management reviewed each issue and responded to the report on January 30, 1992. Fifteen action items have been assigned by plant management to track implementation of the corrective actions identified in the response. Six (6) items have been assigned to the Plant Management, three (3) to the Training organization, two (2) each to OM&M and Control and Administration (C&A), and one (1) each to Regulatory Compliance and the Site Work Force Control Group. The first action item is associated with the development of an action plan to reduce the frequency of plant events and

is scheduled to be complete by February 28, 1992. The longest term action item is associated with the clean up of materials in the spent fuel pool and has a December 31, 1993 scheduled completion date.

- An INPO Special Assistance visit in the area of work control was conducted the week of February 10 - 14, 1992. The associated report is expected to be issued on February 21, 1992.

- Other departments and nuclear sites are being visited or researched for good practices which would be applicable to maintenance. The Brunswick Plant diesel maintenance team and its supervisor recently participated with Duke Power's McGuire Plant maintenance department in a complete overhaul of their Nordberg diesel engine.

The Company is providing management attention and support to the Diesel Generator Enhancement Program. A weekly status of the action items is provided to management with expected actions for overdue items. A detailed monthly status provides the master schedule, a summary of significant work performed during the month, the plan status, the major findings and their disposition during the month, and the outstanding problems. The action item plan was originally prepared August 16, 1991. The plan includes 18 major items with 132 associated sub-action items. The January 7 - 31, 1992 status report, dated February 11, 1992, reported that 77 sub-items are complete and 55 are on schedule. The anticipated completion date for the 18 major items is December 31, 1992.

Additionally, an assessment of component failures will be conducted to ensure appropriate maintenance is being afforded to equipment that affects safe operation of the plant. The Corrective Action Program (CAP) has identified an apparent adverse trend in the area of component failures. This is to be documented for action determination in the Corrective Action Program's January 1992 report, expected to be issued February 24, 1992. The specific course of action and schedule to assess this apparent trend has not yet been determined. Personnel from the Technical Support, Maintenance, and Corrective Action Program organizations are currently working together to determine the correct course of action.

SAFETY ASSESSMENT/QUALITY VERIFICATION FUNCTIONAL AREA:

Corrective Action Program:

Training is in progress to improve the quality and the effectiveness of Root Cause Analyses (RCA) and the overall Corrective Action Program. The RCA training will be in three categories:

1.) Initial RCA training for personnel who have not had training.
2.) Refresher RCA training for personnel who were trained in the past.
3.) Overview RCA training for supervisors who review RCAs but have not had the initial training.

The overall Corrective Action Program training is targeted for first line supervisors and above. The supervisor Corrective Action Program training should be completed by the second quarter of 1992.

An INPO Special Assistance visit in the area of the Brunswick Plant Corrective Action Program is scheduled for the week of March 2, 1992. Additionally, the Corporate Corrective Action Program

organization is scheduled to review selected areas of the Brunswick Plant Corrective Action Program in the first half of 1992.

Plant Nuclear Safety Committee:

The Company intends to continue the improved effectiveness noted within the SALP report of the Plant Nuclear Safety Committee (PNSC).

Nuclear Assessment Department:

The staffing and training of Nuclear Assessment Department personnel was essentially complete on July 1, 1991. The quality of the assessment reports improved as noted in the SALP report, and that improvement continued with the recently completed Brunswick Plant Site-Wide, Training and Corrective Action Program assessments. Recognizing weakness in the original March 1991 Environmental and Radiation Control Functional Assessment, a thorough supplemental report was issued on September 8, 1991. Future Nuclear Assessment Department efforts will be focused on self-assessment within the line organization and the Nuclear Assessment Department, and the quality of Nuclear Assessment Department products. Additionally, the Nuclear Assessment Department plans to perform two (2) assessments of the Brunswick Plant Corrective Action Program in 1992.

Quality Control:

QC presence and support during maintenance activities is being increased. QC works with the SWFCG chairman to determine priorities and to identify which maintenance activities receive assessment. The emphasis is on effective use of the work control process, including procedural adherence. Also, the QC inspector will coach maintenance personnel on possible improvements and thereby reduce the probability for rework.

Licensing Correspondence and Submittals:

The quality and timeliness of licensee event reports and other licensing correspondence will be emphasized. The 10 CFR 21 and 10 CFR 50.59 programs will continue to be effective in identifying potential concerns. Communication of plant events to the Corporate Office is being improved by utilization of a programmable FAX machine which will transmit copies of Red Phone Reports at the time of transmittal to the NRC.