

June 27, 1984

Docket No. 50-325/324

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MEMORANDUM FOR: Richard Lewis, Director
Division of Projects & Resident Programs

THRU: Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

FROM: Marshall Grotenhuis, Project Manager
Operating Reactors Branch #2
Division of Licensing

SUBJECT: NRR SALP INPUT - BRUNSWICK STEAM ELECTRIC PLANT,
UNITS 1 AND 2


Enclosed is NRR's input for the July 25, 1984 SALP Board meeting for the Brunswick Steam Electric Plant, Unit 1 and 2. As discussed in the enclosure, our evaluation was conducted according to NRR Office Letter No. 44 dated January 3, 1984 and NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance.

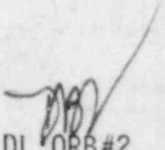
Original signed by:

Marshall Grotenhuis, Project Manager
Operating Reactors Branch #2
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Enclosure:
As stated

cc w/enclosure:
D. Eisenhut
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Docket No. 50-325/324

Facility: Brunswick Steam Electric Plant, Units 1 and 2
Licensee: Carolina Power & Light Company
Evaluation Period: February 1983 to April 30, 1984
NRR Project Manager: M. Grotehnuis (S. MacKay)

I. Introduction

This report presents the results of an evaluation of the licensee, Carolina Power & Light Company, in the functional area of licensing activities. It is intended to provide NRR's input to the SALP review process as described in NRR Office Letter No. 44 dated January 4, 1984 which encloses NRC Manual Chapter 0516. The review covers the period February 1, 1983 to April 30, 1984.

II. Summary of Results

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category (category 1,2,or 3) based on a composite of a number of attributes. The single final rating to be tempered with judgement as to the significance of the elements.

Based on this approach, the performance of Carolina Power & Light Company in the functional area - Licensing Activities - is rated category 2.

III. Criteria

Evaluation criteria, as given in NRC Manual Chapter Appendix 0516 Table 1, were used for this evaluation.

IV. Methodology

The basic approach used in the evaluation was for the PM to receive input from the NRC staff on all licensing activities which involved a significant amount of staff effort. The individual reviewers applied the evaluation criteria contained in NRC Manual Chapter 0516 to the various performance attributes to be evaluated and assigned a rating category based on his experience with the licensee. This information was transmitted to the PM verbally or with each Safety Evaluation, reviewed by the PM and incorporated with his experience in preparing an overall evaluation of the licensee's performance. The PM discussed and incorporated the comments of the assigned NRR Senior Executive into the evaluation. The evaluation was then circulated for NRR management

comments. The comments were then appropriately incorporated. An NRR narrative assessment for each performance attribute in Licensing Activities as well as any comments relative to other SALP areas is included.

The assessment of licensee performance was based on an evaluation on the following licensing activities:

- Project Management Administration
- Response to NUREG 0737 Items
- Control of Heavy Loads
- Environmental Qualificaiton
- Mark I Containment
- Spent Fuel Pool Expansion
- NUREG 0737 Supplement 1 Items
- Adequacy of Station Electric Distribution System
- Masonry Wall Design
- Radiological Effluent Technical Specifications
- NUREG 0737 TSs
- Reactor Protection System Review
- Pipe Crack Inspections
- Containment Vent and Purge Review
- Reload Review
- 17 additional Technical Specification change Licensing Actions

V. Assessment of Performance

The licensee's performance evaluation is based on a consideration of the seven evaluation criteria given in NRC Manual Chapter 0516 they are:

- Management involvement and control in assuring quality
- Approach to resolution of technical issues from a Safety Standpoint.

- Responsiveness to NRC Initiatives
- Enforcement history
- Reporting and analysis of reportable events
- Staffing (including management)
- Training and qualification effectiveness

The criteria of Enforcement History, Reporting and Analysis of Reportable Events, Staffing and Training were judged to apply in a more limited way to the functional area, Licensing Activities, and therefore are given little or no weight, as applicable. An assessment of each evaluation criterion is given below.

A. Management Involvement and Control in Assuring Quality.

The overall rating for this category is 2.

In particular, close attention to the battery problem, Appendix R and Environmental qualification, have shown the positive results of the direct involvement of management in producing a high quality product. In the case of the battery problem a project organization was established with appropriate Technical expertise as well as management attention and involvement. In other cases, in particular several issues ~~involved~~ in the Brunswick Pilot Effort,* slow licensee responses and poor communication between CP&L licensing and the plant staff led to quick responses by management to resolve the problems that developed. The net result is that when there was prior planning and assignment of priorities, the results were excellent and when there was not as thorough planning and assignment of priorities, and CP&L was so informed, management responded promptly and effectively. Steps have been taken to increase CP&L licensing staff communications and effectiveness on a permanent basis. For example, a licensing staff member will be located at the Brunswick site and an additional staff member has been added in the corporate office. Monthly review meetings have been instituted to review status of licensing actions.

B. Approach to Resolution of Technical Issues from Safety Standpoint

The overall rating of this Category is 2.

There appears to be a clear understanding of most issues and workable approaches are taken to resolve them. The overall technical competence has been good. Sound technical basis and conservatism are generally provided to support the licensee's positions. These attributes were most aptly demonstrated in responding to the actions on the battery problem, where the personnel exhibited a clear understanding and conservative approach,

* On about October 1, 1983 a special cooperative effort was begun by CP&L and NRC to clear up as much of the Brunswick Licensing backlog as possible in a short time (~ 3 or 4 months). This special effort is referred to as the Brunswick Pilot Effort.

(recent discussions indicate that the licensee is planning Technical Specifications that are responsive to the staff discussions) fire protection, where the monthly meetings were effective in providing a prompt response, Environmental Qualification, where one effective meeting was held to resolve all issues, and RETS, which was rated category one by the reviewers.

C. Responsiveness

The overall rating for this Category is 2.

Responses were usually on time. For those that were late, the licensee usually provided advance notice to the project manager. The timeliness problems that developed during the Brunswick Pilot Effort were resolved.

D. Enforcement History

This attribute was not used in assessing CP&L performance in licensing actions.

E. Reporting and Analysis of Reportable Events

This attribute was not used in assessing CP&L performance in licensing actions.

F. Staffing

The overall rating for this Category is 2.

This is based on the interaction with the licensing and technical staff in implementing the licensee actions used for this evaluation. While there was a period during the Pilot Effort where the Licensing staff was behind, steps were taken by CP&L management to improve the situation. The Licensing staff has been increased by an added person at the plant and at the corporate office.

G. Training and Qualification Effectiveness

This attribute was not used in assessing CP&L in licensing actions.

V. Conclusion

Based on the Carolina Power & Light Company's performance for a number of significant activities in the functional area of licensing, an overall rating of Category 2 is appropriate. The licensee staff has demonstrated willingness to work with the Commission in a timely manner. It has an understanding of plant design and operations. Its responsiveness in most licensing issues was impressive. Management capability in licensing has been strengthened (NRR deals primarily with the licensing staff).