

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

'84 AGO -8 P12:22

In the Matter of

CAROLINA POWER AND LIGHT COMPANY AND
NORTH CAROLINA EASTERN MUNICIPAL
POWER AGENCY

(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

Docket Nos. 50-400 OL
50-401 OL

NRC STAFF FURTHER RESPONSE TO INTERROGATORIES
DATED MARCH 29, 1984 REGARDING JOINT INTERVENOR'S CONTENTION I
(MANAGEMENT QUALIFICATIONS)

Interrogatory 145 - The sworn Answer of Floyd S. Cantrell, Jr. is attached.

Interrogatory 147 - The sworn Answer of Paul R. Bemis is attached.

Interrogatory 152 asks whether the NRC Staff has made an analysis of Wells Eddleman's limited appearance statement made at the hearings on Management during 1979.

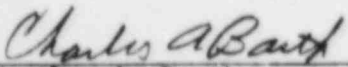
Answer. Mr. Eddleman's limited appearance statement appears on pages 2381-2403 of the transcript and was amplified on pages 2731-2735, 2882-2896, and 2985-2990. At transcript pages 2404 and 2405, the Licensing Board ordered the Staff to respond to Mr. Eddleman's limited appearance statement. Such a response would be served by Staff counsel. I have searched the Harris index of all filings made by OELD for the two years succeeding the close of the hearing. The OELD records do not indicate that such a response was sent to Mr. Eddleman or the Board or to any of the parties. I have discussed the matter with licensing project

DS07

manager and OELD attorney who were then in charge of the proceeding. Neither of them has any present recollection that such a response was either prepared or transmitted to Mr. Eddleman.

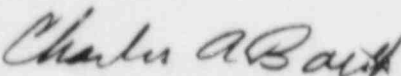
Interrogatory 154 - The sworn Answer of Paul R. Bemis is attached.

I hereby affirm subject to the penalty of perjury that I answered Interrogatory 152 and the answer is true and correct to the best of my knowledge and belief.



Charles A. Barth

Respectfully submitted,


Charles A. Barth
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 3rd day of August, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CAROLINA POWER AND LIGHT COMPANY AND
NORTH CAROLINA EASTERN MUNICIPAL
POWER AGENCY

(Shearon Harris Nuclear Power Plant
Unit 1)

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Docket Nos. 50-400-OL

Affidavit of Floyd S. Cantrell, Jr.
In Support of the Answer to Interrogatory 145

State of Georgia

)

County of Fulton

)

I, Floyd S. Cantrell, Jr., being first duly sworn hereby state:

1. I, Floyd S. Cantrell, Jr., am an employee of the U.S. Nuclear Regulatory Commission. My present position is as a Section Chief assigned to Region II, Atlanta, Georgia.

2. My concern about CP&L ability to operate the Harris plant as presented in the remanded Harris Hearing, 10 NRC 37 at 76, 77 (1980) was based on my observations as principle inspector at Brunswick during the period 1974 thru 1977. No special investigation was made after those hearings into my concerns. Rather, they became another matter inspected as part of the Region's routine inspection program.

Following several enforcement conferences and Civil Penalties, CP&L initiated the Brunswick Improvement Plan (BIP) in 1983. As a part of answer to interrogatory 145, I was asked to go to the Brunswick site and review conditions at the plant, discuss the BIP and the results achieved. The items discussed below are based on discussion with NRC and Licensee personnel at the site, and personnel observation. Included in these discussions were operators, technicians, supervisors, plant manager, site director, and clerks.

Once CP&L decided to initiate the BIP, CP&L management solicited help from their people at both corporate and site levels to support the BIP. Each person was reportedly informed that CP&L would operate in strict compliance with procedures and regulatory requirements and why. My discussions with members of the CP&L staff located at Brunswick confirmed that the CP&L employees, people at all levels, are supportive of management, and have an affirmative attitude.

Licensed reactor operators and senior reactor operators have been retrained and reexamined. Initiatives were established to achieve an understanding of the systems and management controls that went beyond what was necessary just to attain a passing grade on the NRC license examination. Surveillance and operating procedures were revised to permit strict adherence to procedures while still accomplishing the necessary tasks.

Experienced personnel were hired for key positions in the organization, including some former CP&L employees that had gained additional experience during their employment at other nuclear facilities. These persons brought a variety of experience and new ideas to CP&L that have contributed to the improvements that have been noted. The plant staff retention has been stabilized. The number of

violations has decreased and the plants operating efficiency has improved, although as a result of scheduled TMI modifications, torus modifications, and self imposed improvement items, operating efficiency is expected to remain low at least another year.

During my recent inspection on April 12-13, 1984, considering that one unit was in a maintenance/refueling outage, the appearance of the plant was good. Areas that previously required full anti-contamination clothing to enter (i.e., lower elevation in the radwaste area) were open for surveillance of equipment or for inspection in street clothing without becoming contaminated. A clean walkway with curbs was laid out for the -17' elevation in the reactor building to permit access to that area without the need to dress in anti-contamination clothing. The pipe tunnels are being systematically cleaned and painted. From the changes noted in these and other areas, it is obvious that managers and supervisors routinely tour the plant to assess condition including the housekeeping practices, and initiate required action. It appears that the CP&L staff is dedicated to improving the appearance of the areas and eliminating or reducing the number or size of contaminated areas, while operating within the regulation and to improving operating efficiency.

It is my conclusion based on my last visit to Brunswick, reviewing Brunswick's progress, and discussions with inspectors who have been to Brunswick that the problems identified with CP&L management with respect to Brunswick at the remanded hearing, have been addressed by CP&L, and have resulted in a significant improvement in management performance.

Nancy L. Barr
Nancy L. Barr
Nuclear Public, Georgia, State at Large
Commission Expires May 15, 1988

Floyd S. Cantrell, Jr.
Floyd S. Cantrell, Jr.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

CAROLINA POWER AND LIGHT COMPANY AND)
NORTH CAROLINA EASTERN MUNICIPAL)
POWER AGENCY)

(Shearon Harris Nuclear Power Plant)
Unit 1))

Docket Nos. 50-400-OL

Affidavit of Paul R. Bemis
In Support of the Answer to Interrogatory 147

State of Georgia)

County of Fulton)

I, Paul R. Bemis, being first duly sworn hereby state:

1. I, Paul R. Bemis, am an employee of the U.S. Nuclear Regulatory Commission. My present position is as a Section Chief assigned to Region II, Atlanta, Georgia.

2. Attached are copies of meeting summaries and/or agendas of meetings with CP&L. Additional information on meetings between the NRC (Region II) and CP&L are also contained in the following inspection and enforcement reports.

H. B. RobinsonBrunswick 1 and 2

50-261/81-11

50-324 & 325/81-07

50-261/81-28

50-324 & 325/81-25

50-261/82-43

50-324 & 325/82-07

50-261/83-07

50-324 & 325/82-27

50-261/83-10

50-324 & 325/82-47

50-261/83-20

50-324 & 325/83-09

50-261/83-25

50-324 & 325/83-12

50-261/84-08

50-324 & 325/83-19

Harris Unit 1

50-400/83-10

50-400/84-08

3. While performing a manual search of the documentation to respond to additional information on this interrogatory, the following additional management meetings were found to be inadvertently omitted in the first response.

ROBINSON

September 16, 1981: A meeting to discuss radiation overexposure and corrective action

March 28, 1983: A meeting was held to discuss a radioactive waste shipment containing free liquid.

May 10, 1983: A meeting was held to discuss SALP III.

June 28, 1983: A meeting was held to discuss status of planning and preparations for the steam generator replacement outage.

August 16, 1983: A meeting was held to discuss safeguards violations.

February 23, 1984: A meeting was held to discuss violations of radiation protection requirements and effectiveness of management controls.

BRUNSWICK

March 30, 1981: A meeting to discuss investigation findings concerning offsite releases from the auxiliary boilers and the environmental effluents monitoring programs at the Brunswick site.

May 8, 1981: A meeting was held to discuss NRC findings relative to auxiliary boiler releases, spoil pond contamination; and effluent monitor inoperability at Brunswick.

September 16, 1981: A meeting to discuss inspection findings concerning recent radiation overexposure events and proposed correction actions.

November 17, 1982: Discussion of local and integrated leak test programs and the cracked weld in the residual heat removal (RHR) shutdown cooling system.

March 18, 1983: A meeting to discuss the status of the Brunswick Improvement Program.

March 28, 1983: A meeting to discuss the standby Gas Treatment Deluge System

April 26, 1983: A meeting to discuss CP&L's Action Relative to Q-List Equipment

May 10, 1983: Management meeting to discuss SALP III.

May 18, 1983: A meeting to discuss the inoperability of Unit 2 Off Gas Radiation Monitor

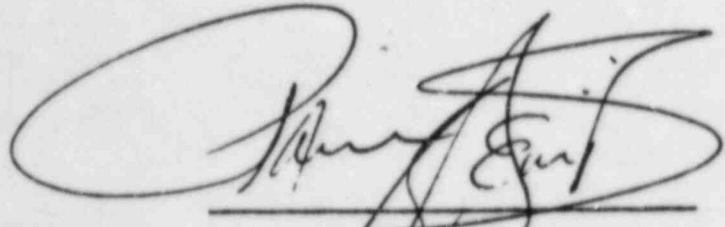
July 8, 1983: A meeting to discuss outstanding CP&L Regulatory Issues

June 15, 1983: Region II staff briefing by CP&L on Brunswick Improvement Program and Related Issues

July 27, 1983: A meeting to discuss breach of Plant Security

August 31, 1983: A meeting to discuss restructuring of CP&L's Corporate Organization

December 9, 1983: A meeting to discuss review of CP&L Management Initiated
Changes



Paul R. Bemis

Edgar L. Baker
Notary Public

7/1/86
My Commission Expires

JAN 20 1983

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: CONFIRMATORY ORDER (EA-87-001 AND MEETING SUMMARY BRUNSWICK
UNITS 1 AND 2) (CORRECT NO. 87-0174 AND 87-025)

This refers to your letter to this office dated January 10, 1983, which was in response to the NRC Confirmatory Order issued December 22, 1982. It also refers to the meeting held with you and members of our staff in Region II on January 11, 1983, at your request. Both the meeting and your letter related to activities authorized by NRC Operating License Nos. DPR-62 and DPR-71 for the Brunswick facility.

The purpose of the meeting was to discuss the Confirmatory Order and information contained in your January 10 letter and its attachments. A summary of the meeting is provided as an enclosure.

Attachments I and II to your letter identified nine action items for which you requested, in accordance with Section III of the Confirmatory Order, an extension of the completion dates established in the Brunswick Improvement Program. We have reviewed the requested changes and the reasons for the request and hereby approve the revised completion dates.

We also acknowledge receipt of Attachments III through VII to your letter which include two reports prepared by Management Analysis Company, an implementation plan and schedule for recommendations resulting from the INPO Special Assessment, the results of the Shift Foreman Time Utilization Study and an updated copy of the Brunswick Improvement Program. We are currently evaluating these documents and will correspond with you further when our evaluation is complete.

With regard to the Essex Corporation Human Factors Study we concur with your decision not to submit the document to us due to the volume of material involved. However, this document should be retained at the site for our review and cross-reference to the summary which you have committed to provide by June 1983.

It is our opinion that this meeting was beneficial and has provided for a mutually better understanding of these issues. Your cooperation with us is appreciated. In accordance with Section 2.790 of NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and enclosure will be placed in the NRC's Public Document Room.

If you have any questions concerning this matter, we will be pleased to
assist you.

Sincerely,

James P. O'Reilly
Regional Administrator

Enclosure: Meeting Summary

cc w/enc1:
G. S. Diets, Plant Manager

cc w/enc1:
Commissioner Gilinsky
J. A. Axelrad, IE
NAC Resident Inspector
Document Management Branch
State of North Carolina

RII

AkHardin:ejw
1/ /83

RII

DMVerrell
1/ /83

RII

RCLewis
1/ /83

RII

CEAlderson
1/ /83

ENCLOSURE

MEETING SUMMARY

Licensee: Carolina Power & Light Company

Facility: Brunswick 1 and 2

License No.: DE-17 and DE-02

Bracket Nos.: 50-324 and 50-325

Subject: Confirmatory Order EA-88-100 Related to the Brunswick Improvement Program

1. Subjects Discussed

Section III, Paragraph 1, of the subject order required the licensee to notify the Region II Administrator, within 20 days of the effective date of the Order (December 22, 1982), of any action items for which scheduled completion dates preceded the date of the order, were not met and establish the completion dates, which are to be attached to the Order II Confirmatory Order for those tasks. This notification was submitted by the licensee by letter to Region II dated January 10, 1983.

Attachment I.a to the licensee's January 10 letter which identified three action items for which scheduled completion dates preceded the date of the Confirmatory Order and which had not been completed by that date was discussed. The discussion included the reasons for the delay and the new completion dates requested by the licensee.

Attachment I.b to the licensee's January 10 letter was also discussed. That attachment identified six action items with scheduled completion dates after the date of the Order for which the licensee was requesting extensions in the completion dates. The discussion included the reasons for the requested extensions and the new completion dates.

The licensee also described additional actions discussed in the January 10 letter initiated beyond the actions described in the Brunswick Improvement Program submitted on October 29, 1982.

Meeting Attendees

Georgia Power & Light Company

- 1. Wiley, Executive Vice President
- 2. Smith, Vice President, Technical Services
- 3. Eury, Senior Vice President, Power Supply Group
- 4. [Name], District Manager, Brunswick

Nuclear Regulatory Commission, Region II

- 1. O'Reilly, Regional Administrator
- 2. Lewis, Director, Division of Project and Resident Programs (P&R)
- 3. Johnson, Director, Program Support Staff
- 4. Jones, Regional Counsel
- 5. Vennelli, Chief, Projects Branch 1, PRP
- 6. Burger, Technical Assistant, PRP
- 7. Hardin, Project Inspector, PRP
- 8. Myers, Senior Resident Inspector, Brunswick



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

JUN 19 1984

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
Power Supply, Engineering
and Construction
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: MEETING SUMMARY - DOCKET NOS.: 50-325 AND 50-324 (BRUNSWICK);
50-261 (ROBINSON)

This refers to the meeting, conducted at your request, in the Region II Office on May 30, 1984. This meeting was held to discuss proposed 10 CFR 50.54(p) changes to the Brunswick and Robinson Industrial Security Plans and your contractor screening program.

It is our opinion that this meeting was beneficial and has provided a better understanding between our security staffs. In accordance with Section 2.790 of NRC's "Rules of Practice", a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them.

Sincerely,

R.C. Lewis
Richard C. Lewis, Director
Division of Reactor Projects

Enclosures:

1. Meeting Summary
2. Attendance List

cc w/encls:

- G. P. Beatty, Jr., Manager
Robinson Nuclear Project Department
- R. E. Morgan, Plant General Mgranger
- P. W. Howe, Vice President
Brunswick Nuclear Project
- C. R. Dietz, Plant General Manager

ENCLOSURE 1

MEETING SUMMARY

Licensee: Carolina Power and Light Company (CP&L)

Facilities: Brunswick and Robinson

Licenses: DPR-71, DPR-62, and DPR-23

SUBJECT: PROPOSED REVISIONS TO THE PHYSICAL SECURITY PLANS

On May 30, 1984, members of the NRC staff and a representative of CP&L met to discuss a proposed change to the Brunswick Industrial Security Plan relative to the incorporation of the Technical Support Center (TSC) into the plan. The licensee was advised that the majority of the changes appeared to be consistent with the provisions of 10 CFR 50.54(p). One area involving intrusion detection would require further review by the Regional security staff with members of the Office of Nuclear Materials Safety and Safeguards (NMSS), Division of Safeguards staff.

A proposed change to the Robinson Industrial Security Plan relative to the steam generator replacement program was also discussed. It was agreed that the licensee would submit an amended page to the Robinson plan addressing the duration of an alternate access control point. The CP&L representative also discussed the company's Personnel Screening Criteria for Non-Licensee Personnel in Operating Nuclear Plants.

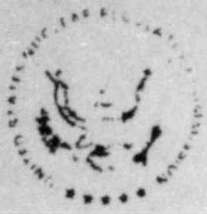
ENCLOSURE 2
ATTENDANCE LIST

Carolina Power and Light Company

J. Walker, Project Specialist - Security

U.S. Nuclear Regulatory Commission

C. Perny, Physical Security Specialist
B. Hall, Physical Security Specialist



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

SEP 22 1983

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: SUMMARY OF MEETING WITH CP&L CORPORATE MANAGEMENT
DOCKET NOS. 50-325, 50-324, 50-261, 50-400 AND 50-401

This refers to the meeting held at your request on August 31, 1983, between NRC Region II representatives and members of CP&L's corporate staff. The meeting was convened for the purpose of CP&L's presentation of the restructuring of the company's corporate organization.

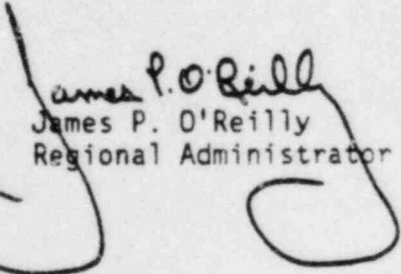
The meeting related to activities authorized by NRC License Numbers DPR-23, DPR-62, DPR-71, CPPR-158 and CPPR-159. Opening remarks were made by Mr. James P. O'Reilly, the NRC Regional Administrator, who discussed the purpose of the meeting. Mr. E. E. Utley, Executive Vice President, CP&L, presented the corporate reorganization. The major restructuring of the corporate organization is a step in the licensee's move toward nuclear consolidation. More detailed presentations of organization responsibilities and philosophy were made by members of the CP&L corporate staff.

During the presentation, discussions and comments relative to the organizational relationships were held between the meeting participants.

It is our opinion that this meeting was beneficial and has provided for a better understanding of your organizational goals. Your cooperation with us is appreciated. In accordance with Section 2.790 of NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and enclosure will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them.

Sincerely,


James P. O'Reilly
Regional Administrator

cc: (See page 2)

SEP 22 1983

cc: H. R. Denton, Director, Office of
Nuclear Reactor Regulation
J. H. Sniezek, Deputy Director,
Office of Inspection and Enforcement
C. R. Dietz, Brunswick Plant Manager
R. E. Starkey, Jr., Robinson
Plant General Manager
R. M. Parsons, Harris Project
General Manager

UNITED STATES
NUCLEAR REGULATORY COMMISSION

A. Hardin

REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

AUG 1 1983

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
Power Supply and Engineering
and Construction
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: SUMMARY OF MEETING WITH CP&L CORPORATE MANAGEMENT
DOCKET NOS. 50-325, 50-324, 50-261, 50-400 AND 50-401

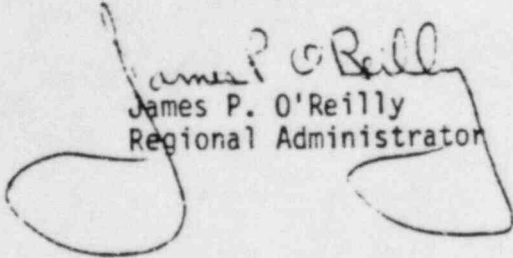
This refers to the meeting held at NRC's request on July 8, 1983, among CP&L's Chairman, Sherman H. Smith, Jr., members of his staff, and NRC representatives, near Raleigh, North Carolina.

The meeting related to activities authorized by NRC license numbers: DPR-23, DPR-62, DPR-71, CPPR-158 and CPPR-159. Opening remarks were made by Mr. Smith, followed by a CP&L corporate management presentation. The presentation provided an outline of CP&L's corporate structure and Nuclear Program as it relates to: Quality Assurance, Nuclear Safety, Harris plant construction, Harris plant start-up and operations, Robinson steam generator replacement, pressurized thermal shock, training, and the Brunswick safety improvement program.

During the presentation discussions were held between NRC and CP&L concerning: CP&L management and supervision, organization structure for construction and operations, CP&L's tracking of the Brunswick Improvement Program (NRC Confirmatory Order EA-82-106), Harris site Quality Assurance organization, and the construction status of the Harris plants.

We appreciate both your forthrightness and candor in the presentation of your material. We felt your presentation gave us a clear perspective of where CP&L is today and the direction in which you are headed. Should you have any questions concerning this matter, we will be glad to discuss them with you.

Sincerely,


James P. O'Reilly
Regional Administrator

cc: (See page 2)

AUG 1 1983

cc: H. P. Denton, Director, Office of
Nuclear Reactor Regulation
G. H. Sniezek, Deputy Director, Office
of Inspection and Enforcement
C. R. Dietz, Brunswick Plant Manager
R. E. Starkey, Jr., H. B. Robinson
Plant General Manager
R. M. Parsons, Harris Project
General Manager

UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II

101 MARIETTA ST., N.W., SUITE 310C
ATLANTA, GEORGIA 30303

JUL 20 1983

Handwritten mark

Carolina Power and Light Company
Attn: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: CONFIRMATION OF MEETING - DOCKET NOS. 50-325 AND 50-324

This confirms the telephone conversation between Mr. P. W. Howe and Mr. R. C. Lewis of my staff on July, 13, 1983 concerning an Enforcement Meeting to be conducted at the Brunswick site on July 27, 1983, at 9:30 a.m. We requested this meeting to discuss non-compliance with regulatory requirements in the area of plant security and transportation of radioactive materials. A proposed meeting agenda is enclosed.

Should you have any questions regarding these arrangements, we will be pleased to discuss them.

Sincerely,

James P. O'Reilly
James P. O'Reilly
Regional Administrator

Enclosure:
Proposed Meeting Agenda

cc w/encl:
C. R. Dietz, Plant Manager

ENCLOSURE

PROPOSED MEETING AGENDA

Carolina Power and Light Company with NRC

July 27, 1983, at 9:30 a.m.

- | | |
|---|----------------------|
| I. Opening Remarks | R. C. Lewis |
| II. Discussion of Security Violation | D. R. McGuire |
| III. Discussion of Transportation Violation | A. F. Gibson |
| IV. Response by Licensee | P. W. Howe and Staff |
| V. Closing Remarks | R. C. Lewis |



NUCLEAR REGULATORY COMMISSION

Carroll

JUL 06 1983

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27601

Gentlemen:

SUBJECT: CONFIRMATION OF MEETING ARRANGEMENTS

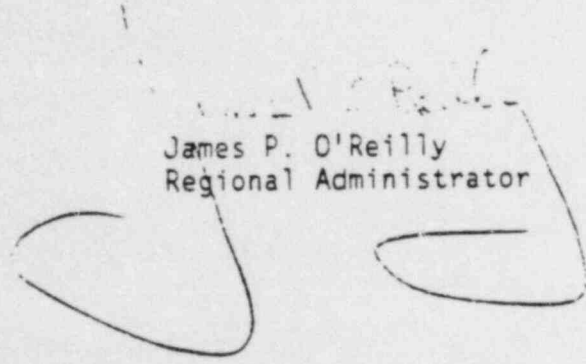
This confirms the schedule for a management meeting to be conducted at the Triangle Motel Raleigh-Durham Airport, Raleigh, North Carolina, on July 8, 1983, at 1:00 p.m. We requested this meeting to discuss the status of outstanding CP&L regulatory issues. A proposed meeting agenda is enclosed.

Should you have any questions regarding these arrangements, we will be pleased to discuss them.

Sincerely,

James P. O'Reilly
James P. O'Reilly
Regional Administrator

Enclosure:
Proposed Meeting Agenda



ENCLOSURE

PROPOSED MEETING AGENDA

Carolina Power and Light Company
July 8, 1983 at 1:30 p.m.

- | | |
|--|---|
| I. Opening Remarks | Sherwood H. Smith, Jr.
James P. O'Reilly |
| II. Discussion of Outstanding Regulatory Issues | |
| (a) Progress of the Brunswick, Robinson
and Harris Improvement Programs | Sherwood H. Smith, Jr.
Edward E. Utley |
| (b) Selected Topics on Recent Experiences
at CP&L Facilities | Harold R. Denton
James H. Sniezek
James P. O'Reilly |
| III. Closing Remarks | Sherwood H. Smith, Jr.
Harold R. Denton
James P. O'Reilly |

UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGIONAL OFFICE
101 MARKET STREET, N.W., SUITE 210
ATLANTA, GEORGIA 30333

MAR 10 1983

Handwritten initials

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
421 Fayetteville Street
Raleigh, NC 27602

Re: Settlement:

SUBJECT: CONFIRMATION OF MEETING ARRANGEMENTS

This confirms the telephone conversation between Mr. P. W. Howe and Mr. P. R. Berns of my staff on March 9, 1983, concerning a management meeting to be conducted at the Brunswick site on March 18, 1983 at 8:00 a.m. We requested this meeting to discuss the status of the Brunswick Improvement Program. A proposed meeting agenda is enclosed.

Should you have any questions regarding these arrangements, we will be pleased to discuss them.

Sincerely,

James P. O'Reilly
James P. O'Reilly
Regional Administrator

Enclosure:
Proposed Meeting Agenda

cc w/encd:
C. R. Dietz, Plant Manager

ENCLOSURE

PROPOSED MEETING AGENDA

March 18, 1983. 8:00 a.m.

- | | | |
|------|--|----------------------|
| I. | Opening Remarks | James F. O'Reilly |
| II. | Discussion of the status of the
Brunswick Improvement Program | CP&L Corporate Staff |
| III. | Closing Remarks | James P. O'Reilly |

AS - SUBMITTED

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: MEETING SUMMARY - BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2 DOCKET
NOS. 50-324 AND 50-325

This refers to the meeting held with you and members of your staff in Region II on January 11, 1983 at your request. The meeting related to activities authorized by NRC Operating License Nos. DPR-62 and DPR-71 for Brunswick and to Confirmatory Order EA-82-106 issued December 22, 1982 for Docket Nos. 50-324 and 50-325.

The primary purpose of the meeting was for the licensee to notify, in accordance with the confirmatory order, the Region II Administrator of action item tasks for which completion dates identified in the Brunswick Improvement Plan would not be met.

We have reviewed the requested changes in completion dates for action items listed in the enclosed meeting summary, and find them acceptable. This letter will serve as written approval by the Region II Administrator of the revised completion dates. This item and other subjects discussed are summarized in the enclosed Meeting Summary.

It is our opinion that this meeting was beneficial and has provided for a mutually better understanding of these issues. Your cooperation with us is appreciated. In accordance with Section 2.790 of NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and enclosure will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them.

Sincerely,

James P. O'Reilly
Regional Administrator

Enclosure: Meeting Summary

cc w/encl:
C. R. Dietz, Plant Manager

Carolina Flood and Light Control

boo w end:
N.C. Resident Inspector
Document Management Branch
State of North Carolina

RII

AKHardin:blh
1/ /83

RII

DMVerrelli
1/ /83

RII

RCLewis
1/ /83

RII

CEAlderson
1/ /83

ENCLOSURE

MEETING SUMMARY

Licensee: Carolina Power & Light Company

Facility: Brunswick 1 and 2

License Nos.: DPR-71 and DPR-62

Docket Nos.: 50-324 and 50-325

Subject: Confirmatory Order EA-82-106 Related to the Brunswick Improvement Plan

1. Subjects Discussed

Section III, Paragraph 1, of the subject order required the licensee to notify the Region II Administrator, within 20 days of the effective date of the order, of any action item tasks for which scheduled completion dates preceding the date of the order, December 22, 1982, were not met and establish new completion dates, which are acceptable to the Region II Administrator, for those tasks. This notification was accomplished by the licensee and is contained in a submittal dated January 10, 1983.

The licensee reported on three items for which scheduled completion dates preceded December 22, 1982 and for which they proposed to extend the completion dates. These were items II-1, VI-1 and VI-2 from the Brunswick Improvement Program transmitted to the NRC Region on October 29, 1982. The items and new completion dates are:

- II-1 Establish a Nuclear Operations procedure governing the standardization and preparation of plant procedures. (Extend completion date from 11/82 to 3/83).
- VI-1 Reassign some of the independent review function responsibilities off-site to provide increased opportunity for direct plant observation. (Extend completion date from 11/82 to 3/83).
- VI-2 Initiate a program of periodic reviews of safety system challenges and reactor transients. (Extend completion date from 11/82 to 12/82).

The licensee also reported on Brunswick Improvement Plan action items with completion dates after issuance of Confirmatory Order EA-82-106 for which

extended completion dates have been established. These items with previously planned completion dates and proposed extended completion dates are:

- I-1 Centralized systematic program for identifying, scoping, scheduling, tracking and closing surveillance requirements and regulatory commitments. (Extend completion date from 12/82 to 2/83).
- VI-1 Upgrade the program for providing training in industry-wide events, incidents, and operating experience reports. (Extend completion date from 12/82 to 9/83).
- VII-1 Management Analysis Company has been retained to perform review of Corporate QA Program. (Extend completion date from 12/82 to 2/83).
- VII-2 Initiate study to reduce outside demands on plant staff. (Extend completion date from 3/83 to 3/11/83).
- VII-4 Shift Foreman Time Utilization study. (Extend completion date from 1/83 to 3/83).
- VII-5 Implementation schedule for appropriate recommendations of the Essex Study. (Extend completion date from 1/83 to 12/83).

In addition the following topics were discussed briefly:

- a. A computerized operations information system to be established by CP&L.
- b. Extension of the Brunswick Improvement Program concept, and details as appropriate, to the Robinson-2 plant. The licensee stated the Robinson plan would be completed within 2 weeks and will be submitted to Region II.
- c. The licensee indicated a desire to discuss results of the Harris 1 and 2 plants self evaluation with the NRC. The Regional Administrator indicated a date would be agreed upon for Region II, personnel to go to the Harris site for this briefing.
- d. Action items are being considered by the licensee which are over and above those in the Brunswick Improvement Plan. Consideration was given as to whether such items should be included in the plan. A decision on this item was held in abeyance pending further review.

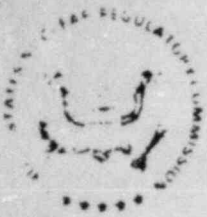
Meeting Attendance

Carolina Power & Light Company

E. Little, Executive Vice President
A. Hove, Vice President, Technical Services
L. W. Eury, Senior Vice President, Power Supply Group
D. D. ... General Manager, Brunswick

Public Regulator, Commissioner, Region II

James F. O'Reilly, Regional Administrator
R. C. Lewis, Director, Division of Project and Resident Programs
E. M. Verrilli, Chief, Projects Branch 1, PRP
J. W. Eurger, Technical Assistant, DPRP
C. E. Alderson, Staff Director, Project Support Staff
B. Jones, Regional Counsel
A. K. Hardin, Project Inspector, PRP
D. O. Myers, Senior Resident Inspector, Brunswick



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W. SUITE 3100
ATLANTA, GEORGIA 30303

DEC 16 1982

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

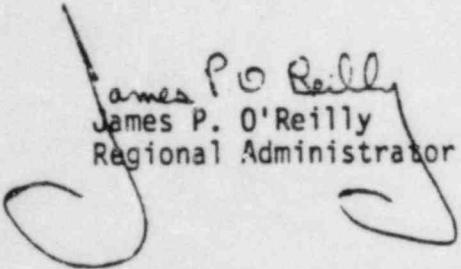
SUBJECT: CONFIRMATION OF MEETING ARRANGEMENTS

This confirms the telephone conversation between P. W. Howe, Vice President, Brunswick Nuclear Project; B. J. Furr, Vice President, Nuclear Operations; and R. C. Lewis of my staff on December 15, 1982, concerning an enforcement meeting at the Region II Office in Atlanta, Georgia on December 22, 1982.

We requested this meeting to discuss repeated failures of CP&L to meet certain regulatory requirements. The time of the meeting was established as 10:00 a.m. A proposed meeting agenda is enclosed.

Should you have any questions regarding these arrangements, we will be pleased to discuss them.

Sincerely,


James P. O'Reilly
Regional Administrator

Enclosure:
Proposed Meeting Agenda

cc w/encl:
R. B. Starkey, Jr., Plant General,
Manager, Robinson 2
C. R. Dietz, General Manager, Brunswick
1 and 2
R. M. Parsons, Project General Manager,
Harris 1 and 2

Enclosure

PROPOSED MEETING AGENDA

Carolina Power & Light meeting with NRC

December 22, 1982 at 10:00 a.m.

- | | | |
|------|---|-------------------|
| I. | Opening Remarks | James P. O'Reilly |
| II. | Discussion of Enforcement Issues | Region II staff |
| | -Incorrect setpoint on safety-related instrumentation | |
| | -Failure to meet commitments made to NRC | |
| | -Inadequate conduct of control room operations | |
| | -Incomplete response to citation of noncompliance | |
| | -Failure to fabricate equipment in accordance with specifications | |
| III. | Response to Enforcement Issues | CP&L staff |
| IV. | Closing Remarks | James P. O'Reilly |

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: CONFIRMATION OF MEETING ARRANGEMENTS

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Sincerely,

James P. O'Reilly
Regional Administrator

Enclosure:
Proposed Meeting Agenda

cc w/encl:
R. E. Starkey, Jr., Plant General
Manager, Robinson 2
C. K. Dietz, General Manager, Brunswick
1 and 2
R. M. Parsons, Project General Manager,
Harris 1 and 2

bcc w/encl:
NRC Resident Inspector
Document Management Branch
State of North Carolina

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CMB
12/16/82

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DVerrelli
12/16/82

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AHerdt
12/16/82

RII
JGulshinski
12/16/82

RII
RCLewis
12/16/82

Enclosure

PROPOSED MEETING AGENDA

Carolina Power & Light meeting with NRC

December 22, 1982 at 10:00 a.m.

- | | | |
|------|---|--------------------|
| I. | Opening Remarks | James P. O'Reilly, |
| II. | Discussion of Enforcement Issues | Region II staff |
| | -Incorrect setpoint on safety-related instrumentation | |
| | -Failure to meet commitments made to NRC | |
| | -Inadequate conduct of control room operations | |
| | -Incomplete response to citation of noncompliance | |
| | -Failure to fabricate equipment in accordance with specifications | |
| III. | Response to Enforcement Issues | CP&L staff |
| IV. | Closing Remarks | James P. O'Reilly |



UNITED STATES
DEPARTMENT OF ENERGY
OFFICE OF ENERGY DELIVERY AND ENERGY RELIABILITY
WASHINGTON, D.C. 20545

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

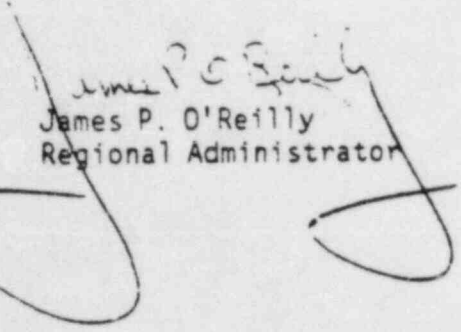
Gentlemen:

SUBJECT: CONFIRMATION OF MEETING ARRANGEMENTS

This confirms the telephone conversation between yourself and Mr. R. C. Lewis of my staff on March 22, 1983, concerning an enforcement meeting to be conducted at the Region II office on March 25, 1983 at 10:00 a.m. We requested this meeting to discuss recent events at Brunswick 1 involving the standby gas treatment deluge system and recent violations involving radioactive waste shipments from Robinson 2. A proposed meeting agenda is enclosed.

Should you have any questions regarding these arrangements, we will be pleased to discuss them.

Sincerely,



James P. O'Reilly
Regional Administrator

Enclosure:
Proposed Meeting Agenda

cc w/enc1:
C. R. Dietz, Plant Manager
R. B. Starkey, Jr., Plant General
Manager

ENCLOSURE

PROPOSED MEETING AGENDA

March 28, 1983

- | | |
|--|-------------------|
| I. Opening Remarks | James P. O'Reilly |
| II. Summary of Events and Licensee's Findings | CP&L Staff |
| III. Discussion of Enforcement Issues | Region II Staff |
| A. Brunswick | |
| -Isolation of a safety-related fire protection system | |
| -Failure of licensee's operating staff to recognize Technical Specification requirements | |
| -Failure to adequately implement surveillance procedures | |
| -Failure to provide a timely report of this reportable occurrence | |
| B. Robinson | |
| -Violation involving shipments of radioactive waste | |
| IV. Response to Enforcement Issues | CP&L Staff |
| V. Closing Remarks | James P. O'Reilly |



NUCLEAR REGULATORY COMMISSION

COMMUNICATIONS SECTION

FEB 9 1983

Shelin

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

SUBJECT: MEETING SUMMARY, HARRIS UNITS 1 AND 2, DOCKET NOS. 50-400 AND 50-401

This refers to a meeting held at your request with Mr. Sherwood H. Smith, Jr., Mr. E. E. Utley, and members of your staff on January 28, 1983, at the Shearon Harris Energy and Environmental Center.

The purpose of the meeting was for CP&L representatives to discuss the results of a self-evaluation of your company's programs related to the Shearon Harris nuclear plants, and to take a tour of the plant site.

It is our opinion that this meeting was beneficial and has provided for a better understanding of the Shearon Harris nuclear units. Your cooperation with us is appreciated. In accordance with Section 2.790 of NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them.

Sincerely,

James P. O'Reilly

James P. O'Reilly
Regional Administrator

cc:
R. M. Parsons, Project General Manager



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CAROLINA POWER AND LIGHT COMPANY AND
NORTH CAROLINA EASTERN MUNICIPAL
POWER AGENCY

(Shearon Harris Nuclear Power Plant
Unit 1)

)
)
)
)
)
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)

Docket Nos. 50-400-OL

Affidavit of Paul R. Bemis,
In Support of Answers to Interrogatory 154

State of Georgia

County of Fulton

)
)
)

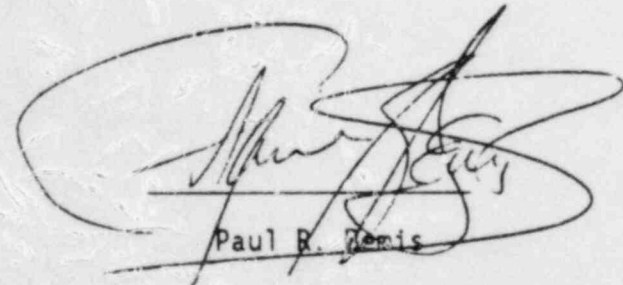
Paul R. Bemis, being first duly sworn hereby state:

I, Paul R. Bemis, am an employee of the U.S. Nuclear Regulatory Commission. My present position is as a Section Chief assigned to Region II, Atlanta, Georgia. Answers to interrogatory 154 were prepared by me.

In the usual case, including Harris, there is no documented analysis of LER's relating them to management control. We do review LERs to determine adequacy, completeness, etc. for trends which could reflect on management. The knowledge gained through LER review, and other places, is used in the overall conclusions which appear in SALP.

The particular precursors identified by NRC to Eddleman 154 were reviewed but no documented analysis as it relates to management was performed.

They are true and correct to the best of my knowledge.



Paul R. Denis

Edythe S. Becker

Notary Public

7/1/80

My Commission Expires

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CAROLINA POWER AND LIGHT COMPANY AND
NORTH CAROLINA EASTERN MUNICIPAL
POWER AGENCY

(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

Docket Nos. 50-400-OL
50-401-OL

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF FURTHER RESPONSE TO INTERROGATORIES DATED MARCH 29, 1984 REGARDING JOINT INTERVENOR'S CONTENTION 1 (MANAGEMENT QUALIFICATIONS)" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 3rd day of August, 1984:

James L. Kelley, Chairman*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Glenn O. Bright*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. James H. Carpenter*
Administrative Judge
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U.S. Nuclear Regulatory Commission
Washington, DC 20555

Daniel F. Read
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Raleigh, NC 27602

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Apex, NC 27502

Travis Payne, Esq.
723 W. Johnson Street
P. O. Box 12643
Raleigh, NC 27605

Dr. Linda Little
Governor's Waste Management Building
513 Albermarle Building
325 North Salisbury Street
Raleigh, NC 27611

Dr. Harry Foreman, Alternate*
Administrative Judge
P.O. Box 395 Mayo
University of Minnesota
Minneapolis, MN 55455

John Runkle, Executive Coordinator
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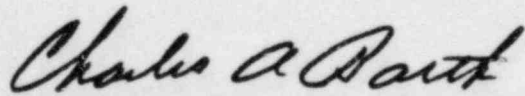
Atomic Safety and Licensing Appeal
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section*
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Robert P. Gruber
Executive Director
Public Staff - NCUC
P. O. Box 991

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Atomic Safety and Licensing Board
Panel*
U.S. Nuclear Regulatory Commission
Washington, DC 20555



Charles A. Barth
Counsel for NRC Staff