



Carolina Power & Light Company  
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SEP 26 1995

SERIAL: BSEP 95-0504

U. S. 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 NOTICE OF VIOLATION  
NRC INSPECTION REPORT NO. 50-325/95-10

Gentlemen:

The purpose of this letter is to respond to your August 28, 1995, letter regarding a notice of violation issued on May 25, 1995. Enclosure 1 provides the information requested in your August 28, 1995 letter. Enclosure 2 provides the commitments contained in our response.

Please refer any questions regarding this submittal to Mr. G. D. Hicks at (910) 457-2163.

Sincerely,

W. Levi  
Director - Site Operations  
Brunswick Nuclear Plant

KAH/sft

Enclosures:

1. Response to NRC August 28, 1995 Letter
2. List of Commitments

cc: Mr. S. D. Ebnetter, Regional Administrator, Region II  
Mr. D. C. Trimble, Jr., Brunswick NRR Senior Project Manager  
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector  
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

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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 AUGUST 28, 1995 LETTER

#### Background:

On May 25, 1995, the NRC issued a Notice of Violation concerning activities related to the Unit 1 B110R1 outage control blade pins and rollers replacement project. On June 22, 1995, CP&L responded to the violation. By letter dated August 28, 1995, the NRC staff indicated that CP&L's response was not adequate in that the established measures were not effective for the control of quality relative to the pins and rollers replacement project.

Although CP&L believes that the actions taken in response to the specific events were appropriate, further measures have been and continue to be taken to establish effective measures for ensuring quality performance of contractor-related activities during future projects. These measures are the result of additional assessments conducted of the Unit 1 B110R1 refuel outage contractor activities and are described below. A common thread of these assessments was the need to effectively establish clear lines of communication and responsibility between contractors and CP&L and the need for more thorough assessment of project readiness. CP&L has lowered its threshold in the area of contractor control. CP&L will pursue positive action where deviation from expectations are observed. The actions taken below exemplify our commitment for identification and correction of contractor performance issues.

#### Steps Taken To Correct Violation A and Results Achieved:

To provide consistent improvement in refuel floor activity performance, including contractor-related activities, a dedicated organization has been established. This organization will monitor contractor compliance with CP&L procedures, coordinate other activities, and provide management oversight of refuel floor activities.

Major contracts now being developed include incentives and penalties based on performance. The incentives and penalties reinforce the expectations provided to the contractor for performing up to CP&L's standards for quality and excellence.

#### Corrective Steps To Be Taken To Avoid Further Violations:

A refuel floor project implementation plan for use by CP&L and contractor project managers for management and planning of pre-outage and outage activities related to the upcoming Unit 2 B212R1 refuel outage will be developed by October 30, 1995.

To ensure that a refuel floor project implementation plan is established for future major refuel floor activities, a milestone for the issuance of a refuel floor project implementation plan will be incorporated into the preplanning milestone schedule by October 20, 1995.

Based on lessons learned from the control blade pins and rollers project, the requirements for Project Implementation Plans, Quality Implementation Plans, and Project Readiness Assessments for major or risk significant contracts will be established in contract administration procedures and training by December 31, 1995. These project implementation plans will clearly define how CP&L and the contractor will monitor compliance with CP&L's expectations and ensure that corrective actions identified during the conduct of activities and agreed to by CP&L are completed prior to restart of work.

Date When Full Compliance Will Be Achieved:

Carolina Power & Light believes that it is in full compliance.

Enclosure 2  
List of Regulatory Commitments

The following table identifies those actions committed to by Carolina Power & Light Company in this document. Any other actions discussed in the submittal represent intended or planned actions by Carolina Power & Light Company. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Brunswick Nuclear Plant of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage
1. A refuel floor project implementation plan for use by CP&L and contractor project managers for management and planning of pre-outage and outage activities related to the upcoming Unit 2 B212R1 refuel outage will be developed.	10/30/95
2. To ensure that a refuel floor project implementation plan is established for future major refuel floor activities, a milestone for the issuance of a refuel floor project implementation plan will be incorporated into the preplanning milestone schedule.	10/20/95
3. Based on lessons learned from the control blade pins and rollers project, the requirements for Project Implementation Plans, Quality Implementation Plans, and Project Readiness Assessments for major or risk significant contracts will be established in contract administration procedures and training. These project implementation plans will clearly define how CP&L and the contractor will monitor compliance with CP&L's expectations and ensure that corrective actions identified during the conduct of activities and agreed to by CP&L are completed prior to restart of work.	12/31/95