PDR-016

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 14, 1984

Mr. Wells Eddleman
Staff Scientist
NC Public Interest Research Group
P.O. Box 2901
Durham, NC 27705

IN RESPONSE REFER
TO FOIA-84-652

Dear Mr. Eddleman:

This is in partial response to your letter dated August 3, 1984, in which you requested, pursuant to the Freedom of Information Act (FOIA), all records related to the Systematic Assessment of Licensee Performance (SALP) reports prepared since 1979, or now under preparation, for the following nuclear plants:

H. B. Robinson #2 (Docket 50-261)
Brunswick 1 and 2 (Dockets 50-324/325)
Shearon Harris (Dockets 50-400, 401, 402, and 403)

The documents listed on Appendix A are responsive to your request. Documents one, two, three and 23 through 36 have previously been placed in the NRC Public Document Room (PDR). Access to these records may be acquired by referencing the accession number listed by each document. The remaining 35 documents are being placed in the PDR in FOIA file folder 84-652.

The search and review of additional documents related to your request are continuing. You will be notified at the completion of the search and review.

Sincerely,

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosure: Appendix A

APPENDIX A

1. SALP Report 50-324/80-40, 50-325/80-43, 50-261/80-31, 50-400/80-24, 50-401/80-22, 50-402/80-22 and 50-403/80-22 - PDR Accession #8102170224
2. SALP Report 50-325/82-15, 50-324/82-15, 50-261/82-17, 50-400/82-14 and 50-401/82-14 - PDR Accession #8210010375
3. SALP Report 50-325/83-09, 50-324/83-09, 50-261/83-07, 50-400/83-10 and 50-401/83-10 - PDR Accession #8306290537
4. Letter from James P. O'Reilly to E. E. Utley dated 9/15/82 - 4 pages
5. Letter from L. W. Eury to James P. O'Reilly dated 6/9/82 - 2 pages
6. Letter from R. C. Lewis to J. A. Jones dated 6/10/82 - 1 page
7. Letter from E. E. Utley to James P. O'Reilly dated 7/28/82 w/attachments - 49 pages
8. Letter from James P. O'Reilly to E. E. Utley dated 6/14/83 w/enclosures - 24 pages
9. Memorandum from James P. O'Reilly to Chairman, SALP Review Group, dated 1/15/81 w/enclosures - 4 pages
10. SALP Meeting handout, 5/29/82 - 14 pages
11. SALP Meeting Slides, 5/10/83 - 46 pages
12. Memorandum from M. V. Sinkule to R. C. Lewis, J. A. Olshinski and J. P. Stohr dated 2/8/83 - 3 pages
13. Memorandum from James P. O'Reilly to J. R. Denton, Carlyle Michelson and J. G. Davis dated 2/9/83 - 1 page
14. Notice of Significant Meeting dated 4/20/83 - 2 pages
15. Notice of Significant Meeting dated 3/24/83 - 2 pages
16. Notice of Significant Meeting dated 3/25/83 - 2 pages
17. Letter from E. E. Utley to P. R. Bemis dated 4/13/83 - 1 page
18. Memorandum from G. R. Jenkins to M. V. Sinkule dated 8/5/82 - 3 pages
19. Notice of Significant Meeting dated 7/7/83 - 2 pages

APPENDIX A

(CONTINUED)

20. Memorandum from M. V. Sinkule to R. C. Lewis, J. A. Olshinski and J. P. Stohr dated 5/4/84 w/copy of Inspection Report Number Log Book - 22 pages

21. Regional Office Instruction No. 1411, Rev. 4, dated 2/1/84

22. Listing of CPL Inspection Report Numbers for Independent Measurements Section.

23. EA 82-75 dated 7/16/82 - PDR Accession #8208060125

24. EA 82-106 dated 2/18/82 - PDR Accession #8303090166

25. EA 83-88 dated 1/10/84 - PDR Accession #8402010027

26. EA 83-70 dated 9/1/83 - PDR Accession #8310070273

27. EA 84-14 dated 3/13/84 - PDR Accession #8403300324

28. EA 83-94 dated 11/15/83 - PDR Accession #8312230292

29. Inspection Report 50-261/82-03 - PDR Accession #8208160377

30. Inspection Report 50-261/83-16 - PDR Accession #8307140089

31. Inspection Report 50-324, 325/83-08 - PDR Accession #8304110828

32. Inspection Report 50-324, 325/83-31 - PDR Accession #8311070132

33. Inspection Report 50-324, 325/84-01 - PDR Accession #8404060093

34. Notice of Violation dated 12/3/82 - PDR Accession #8307140317

35. Notice of Violation dated 7/13/82 - PDR Accession #8309090552

36. Letter to CP&L containing the SALP Report for Brunswick, Robinson and Harris - PDR Accession #8306290524, dtd. June 14, 1983

37. SALP Evaluation For Core Performance Branch Input For SSER
Plant: Shearon Harris Units 1 and 2 (1 page)

38. Systematic Assessment of Licensee Performance Board Report
Shearon Harris Nuclear Power Plant Units 1 and 2 (64 pages)

39. Memo from W. Russell to Gus Lainas dated April 4, 1984 re: SALP Input For Shearon Harris Unit -1 w/enclosure (5 pages)

40. Memo from M. Srinivasan to George Knighton dated April 11, 1984 re: Input to SALP Report For Shearon Harris - 1 w/enclosure PSB/DSI SALP Input sheet (2 pages)

APPENDIX A

(CONTINUED)

41. Memo from B. Liaw to G. Knighton dated May 29, 1984 re: Input To SALP Report For Shearon Harris Unit 1

42. Memo from G. Knighton dated May 21, 1984 re: Input to SALP Report for Shearon Harris-1 w/enclosure Evaluation Matrix (2 pages)

43. Memo from Faust Rose to George Knighton dated May 24, 1984 re: Input to SALP Report for Shearon Harris Unit 1 w/enclosure (2 pages)

44. Memo from L. Hulman to G. Knighton dated May 24, 1984 re: AEB Input to SALP Report for Shearon Harris-1 w/enclosure Accident Evaluation sheet (3 pages)

45. Memo from W. Butler to G. Knighton dated May 29, 1984 re: CSB Input to SALP Report for Shearon Harris 1 w/enclosure (2 pages)

46. Memo from F. Congel to G. Knighton dated May 29, 1984 re: SALP Input For Shearon Harris-1 w/attachment Evaluation Matrix (3 pages)

47. Memo from Olan D. Parr to George Knighton, dated May 29, 1984 re: SALP Report Fore Shearon Harris w/enclosure (2 pages)

48. Memo from Ronald Ballard to G. Knighton dated May 29, 1984 re: Input to SALP Report for Shearon Harris-1 w/attachment Evaluation Matrix (2 pages)

49. Memo from Brian Sheron to G. Knighton dated June 4, 1984, re: Input to SALP Report For Shearon Harris 1 w/enclosure Systematic Assessment of Licensee Performance (2 pages)

50. Memo from William Gammill to G. Knighton dated June 6, 1984 re: Meteorology Input to Shearon Harris, Unit No. 2, SALP w/enclosure Evaluation Matrix (2 pages)

51. Memo from William Regan to G. Knighton dated June 12, 1984 re: Input to SALP Report For Shearon Harris-1 w/attachment Evaluation Matrix (2 pages)

52. Memo from B. Buckley to Darrell Eisenhut dated June 25, 1984 re: NRR SALP Input For Shearon Harris w/enclosure Assessment (4 pages)

SEP 15 1982

Docket Nos. 50-324, 50-325
50-216, 50-400
50-401

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

Gentlemen:

Subject: Systematic Assessment of Licensee Performance

The Nuclear Regulatory Commission has completed its periodic evaluation of the performance of your reactor facilities. As you are aware, this evaluation program, the Systematic Assessment of Licensee Performance (SALP), involves:

1. An assessment of facility performance by the NRC staff;

2. The issuance of the staff's findings in the form of a final report, the SALP Board Report;

3. A meeting with the senior staff of your company to present and discuss the Board's assessment;

4. Your response to the SALP Board's assessment (if appropriate); and

5. The resolution of your comments, if applicable, and the resultant approval and public distribution of the SALP report by the Regional Administrator.

I want to thank you for your efforts in evaluating the SALP Board Report and in providing programmatic comments for improving the SALP program. I appreciate these comments and assure you that they will receive careful evaluation in our continuing attempts to make this program more valuable. As you are aware, the Federal Register Notice delineating our revised SALP program was publisned for comment in March 1982. This revision was a major change to our SALP program.

As stated in our letter to you of May 21, 1982, tne SALP Board Report for your facilities was developed during a period in which substantive policy changes were occurring in our SALP program. Your SALP Board Report, covering the period July 1, 1980 through December 31, 1981, was completed prior to the publication of the revised SALP program. It is a transition report which bridges our old system with the new one. All future SALP Board Reports will be based on the new criteria as delineated in the Federal Register Notice of March 1982.

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The SALP process evaluates facility performance in both operational and construction phases as they apply to major functional areas. These areas, which are discreet subsets of overall plant performance, are termed functional areas. In accordance with NRC policy, development of the functional area ratings for your facilities was heavily dependent on the professional opinions of our inspectors, their supervisors, and the senior managers of the NRC. A rating of Category 1 is assigned only when, in the judgement of the NRC staff, little or no improvement in a functional area was attainable and a reduction of inspection activity was justified. A Category 2 rating is a staff finding that the functional area is receiving proper management attention and that the involvement of managers is evident. This Category 2 rating classifies the conduct of nuclear activities as having a proper concern for nuclear safety, and the company's resources as being properly applied. A functional area classified as Category 3 is considered to be satisfactory to assure the safety of the public and the environment; however, a Category 3 classification does identify a need for additional licensee management and NRC attention in the specific functional area.

NRC policy requires my careful review of the SALP Board Report and of your comments. In accordance with this policy, I have reviewed the SALP Board Report and your comments on that report. Based on this review, I have approved the SALP Board Report and authorize its public distribution.

The following discussions relate to my resolution of your comments and are considered to be an integral part of your SALP report:

1. Your comments regarding the Harris facility take issue with several SALP Board Report findings. I have looked into these matters as they relate to your interpretation of inspection report findings, the SALP Board Report, and the categorization of evaluated activities for several specific functional areas. I have determined that insufficient inspection activity was performed to justify a rating of Category 1 in the following functional areas: Site Preparation and Foundation, Fire Protection, and Design and Design Changes. The SALP Board Report is hereby amended such that these functional areas are rated as "Not Evaluated"; but with the recognition that these areas are considered to have had a performance level of, as a minimum, Category 2. In all other functional areas I have determined that the professional opinions of the staff are satisfactorily reflected by the SALP Board Report.

   The overall performance of CP&L relative to the Harris facility, reflects favorably upon your management and onsite personnel. It is evident that management attention and involvement are present, and that resources are adequate and effective such that satisfactory regulatory performance is being achieved.

2. With regard to your Robinson facility, I have concluded that insufficient information exists to properly evaluate the functional area of Refueling Operations. The NRC SALP rating for this functional area is hereby amended from Category 2, to "Not Evaluated"; but with the under-

standing that this area is considered to have had a performance level of, as a minimum, Category 2. Additionally, the Surveillance functional area was administratively typed in error on page 23 as Category 3. The Surveillance functional area is rated as Category 2. I have made detailed inquiries regarding your other comments as they pertain to your interpretation of the SALP Board Report and to inspection report findings. After careful consideration of their merit, I have concluded that the SALP Board Report ratings accurately reflect your regulatory performance during this period.

The overall performance of your Robinson facility reflects a proper concern for nuclear safety by the plant and corporate staffs. Management attention and involvement are adequate and resources are being effectively utilized such that satisfactory regulatory performance is being achieved. Certain functional area weaknesses have been identified, however, by the SALP Board Report. You discuss in your response corrective actions which have been initiated in several areas. The NRC will increase attention in the monitoring of your activities in these areas. The ultimate effectiveness of your corrective actions will be evaluated during the course of the year and will be documented in the next SALP Report for the Robinson facility.

3. Several issues are raised in your discussion of the SALP Board's findings for the Brunswick facility. I have looked into these matters as they pertain to your interpretation of operational statistics, inspection report findings, and operating events. I have determined that the professional opinions of the NRC staff are properly reflected in the SALP Board Report.

   The overall performance of your Brunswick facility is categorized as satisfactory, but with a need for increased management attention and involvement in certain functional areas as discussed in the SALP Board Report. Increased NRC attention in these functional areas is also appropriate. We will closely monitor your activities and discuss your performance in the next SALP Report. I am aware of several measures which you have already initiated and which have resulted in improved performance. I feel confident, based on recent commitments by your company, that this improvement will continue and will be reflected in the next SALP Board Report for the Brunswick facility. Additionally, certain programs which were in-place during this SALP period, but which had deficiencies in their implementation, will benefit by an additional year of operative experience and should also reflect improved performance at the next SALP Board.

In accordance with 10 CFR 2.790(a), a copy of this letter; the letter of May 21, 1982, from R. C. Lewis, SALP Board Chairman and the enclosed SALP Board Report; and the letter of July 28, 1982, from E. E. Utley responding to the SALP Board Report will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

No reply to this letter is required; however, should you have any questions concerning these matters, we will be pleased to meet with you.

Sincerely,

James P. O'Reilly
Regional Administrator

Enclosure:
1. R. C. Lewis Letter of May 21, 1982, w/enclosure
2. E. E. Utley Letter of July 28, 1982, w/attachment

cc: C. R. Dietz
R. C. Lewis, NRC, Region II (SALP Board Chairman)

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JUN 9 1982

Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 3100
Atlanta, GA 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
AND
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
AND
SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NOS. 1 AND 2
DOCKET NOS. 50-400 AND 50-401
I&E INSPECTION REPORT NOS. 50-324/325/82-15
50-261/82-17 AND 50-400/401/82-14
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)
BOARD REPORTS FOR BRUNSWICK, ROBINSON AND HARRIS PLANTS

Dear Mr. O'Reilly:

Mr. R. C. Lewis's letter of May 21, 1982 forwarded the results of the NRC SALP Board evaluation for Carolina Power & Light Company's nuclear facilities for the period July 1, 1980 through December 31, 1981. The results of this evaluation were discussed in a meeting held May 28, 1982 between the NRC and Carolina Power & Light Company (CP&L). The subject letter stated that any comments on the report should be forwarded to your office within twenty days of that meeting.

CP&L appreciates the opportunity to comment on the report, but wishes to request an extension to July 30, 1982 of the time to comment on the subject report. CP&L intends to do a thorough review of the report and to provide meaningful well-documented responses. In order to do so, CP&L will require the additional time requested to respond to the large number of items contained within the report. Additionally, a large portion of CP&L's resources are presently devoted to two ongoing refueling outages at our operating units. These resource contraints combined with the large number of items in the report necessitate the extension of the comment period.

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If you have any questions on this report, please contact our staff.

Yours very truly,

L. W. Eury
Senior Vice President
Power Supply

JJS/lr (001C1T3)

cc: Mr. R. C. Lewis (NRC-II)

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

JUN 1 0 1982

Carolina Power and Light Company
ATTN: Mr. J. A. Jones, Senior Executive
Vice President and Chief
Operating Officer
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

Subject: IE Report Nos. 50-324/82-15, 50-325/82-15, 50-261/82-17, 50-400/82-14 and 50-401/82-14 - Systematic Assessment of Licensee Performance (SALP)

We have received your request of June 9, 1982, for extension of the time period for responding to the subject IE Inspection Reports.

We concur in the extension to July 30, 1982. Should you have further questions concerning this subject we will be glad to discuss them with you.

Sincerely,

R.C. Lewis

R. C. Lewis, Director
Division of Project and
Resident Programs

cc: C. R. Dietz, Plant Manager,
Brunswick
R. B. Starkey, Jr., Plant Manager,
Robinson
R. M. Parsons, Plant General
Manager

8210010439

July 28, 1982

Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 3100
Atlanta, GA 30303

RESPONSE TO
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) BOARD
ASSESSMENT OF BRUNSWICK, H. B. ROBINSON AND SHEARON HARRIS PLANTS
REPORT NOS. 50-325/82-15, 50-324/82-15
50-261/82-17, 50-400/82-14 AND 50-401/82-14

Dear Mr. O'Reilly:

Mr. R. C. Lewis's letter of May 21, 1982 forwarded to Carolina Power & Light Company (CP&L) the results of the SALP Board findings for CP&L plants for the time period July 1, 1980 through December 31, 1981. The purpose of this letter is to provide CP&L's response to those findings.

CP&L supports NRC's objectives for the SALP Program. We believe, however, that the SALP Assessment of CP&L's plant performance, if not supplemented with additional explanation, would mislead others with outdated observations and an unbalanced view of CP&L's progress in enhancing safe plant operation and our construction programs. CP&L believes that a "balanced" report is essential if the SALP Program is to achieve its objective of enhancing safe operation and construction and not create misimpressions in the minds of the public and other regulatory agencies.

We believe constructive improvements should be made in the Board's Assessment which would be beneficial in accomplishing the objectives of the program in the following areas:

1. The SALP Board Assessment fails to "consider positive and negative attributes of licensee performance" to a sufficient degree, contrary to the statement made in the introduction of the report. We believe that in fairness, your letter which transmits the SALP Board Assessment and characterizes CP&L's "overall safety performance," should present a more balanced view of our accomplishments during this rating period.

2. The supporting information cited in the SALP Board Assessment, in many categories, does not justify the assigned rating for that category. The Assessment provides a recitation of infractions, some of which are two years old, but ignores, in many categories, the other stated NRC Evaluation Criteria, such as: (a) Management involvement and control in assuring quality; (b) Approach to

resolution of technical issues from a safety standpoint; (c) Responsiveness to NRC initiatives; (d) Reporting and analysis of reportable events; (e) Staffing (including management); and (f) Training and qualification effectiveness. We hope that your letter, which forwards the Board's Assessments, will include assessments of these other attributes and that the report will be supplemented to provide a clearer rationale for these ratings, which at this point are too incomplete to be fully useful to us or to permit independent assessment of the accuracy of the ratings. Also, the citation of past infractions, some of which occurred two years ago, without citing in each case what corrective action was taken by CP&L, can create the impression that the situation remains uncorrected when this is not the case.

3. CP&L has made tremendous progress in the areas of Radwaste Management, Staffing, Health Physics, and Emergency Training, most of which has gone unnoticed in this SALP Board Assessment. Failure to recognize these accomplishments reduces the report's effectiveness for motivating plant staff through recognizing their many positive achievements. Such recognition is vital to accomplishing the SALP Program objectives.

In summary, CP&L believes that the SALP Board Assessment, unless supplemented with additional NRC explanation, presents an unbalanced view of CP&L's past safety performance, will be counterproductive in motivating plant staff to further enhance safety programs, and will be misleading to others. For these reasons, we encourage you to expand on the Board's Assessment in your transmittal letter in order to correct these shortcomings.

Our comments on the SALP Program and the SALP Board Assessment are intended to suggest constructive improvements in this regulatory program, and support achievement of the stated objectives of the program. In this spirit, we have attached detailed comments on the SALP Board Assessment which further support our preceding suggestions for improvements.

Yours very truly,

E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

SRZ/cr (085C1T1)
Attachments

cc: NRC Resident Inspector (SHNPP)
NRC Resident Inspector (HBR)
NRC Resident Inspector (BSEP)

DETAILED REMARKS CONCERNING
SHEARON HARRIS UNITS 1 & 2

The following detailed remarks are provided concerning the Performance Analysis and activities contained within the Systematic Assessment of Licensee Performance (SALP) Report for the Shearon Harris Plant:

General

Carolina Power & Light Company (CP&L) considers that the several analyses cited in the Systematic Assessment of Licensee Performance (SALP) Board Report for the period July 1, 1980 through December 31, 1981 are not adequate to support the conclusions relating to the Harris Plant construction project as set forth in the Report.

The SALP procedure, as published in the Federal Register March 22, 1982, lists seven specific evaluation criteria against which the licensee's performance in a functional area is to be evaluated. Performance was to be evaluated against the following criteria: 1) Management involvement in assuring quality; 2) Approach to resolution of technical issues from a safety standpoint; 3) Responsiveness to NRC initiatives; 4) Enforcement history; 5) Reporting and analyis of reportable events; 6) Staffing; and 7) Training effectiveness and qualification. While it is recognized that the SALP procedure intends that the final rating for each functional area will be a composite tempered with judgement, the procedure also states that if information is scarce or onexistent a decision will not be forced. CP&L considers that a report based almost entirely on enforcement history, as is generally the case here, does not provide enough underlying data to support conclusions reached and emphasizes only one of seven evaluation criteria to the exclusion of the rest.

CP&L also believes that the NRC Staff and SALP Board failed to follow the NRC Assessment Procedure (as published in the Federal Register on March 22, 1982) in several other specific respects:

1. The procedure requires construction permit holders to be assessed annually. The report CP&L was asked to comment on covers an eighteen month period (July 1980 through December 1981). Use of an eighteen month period fails to show improvements in perspective. The lack of perspective is compounded by the Board's tendency to rely almost totally on enforcement events in their analysis of functional areas. If the 12 month period during 1981 had been used in accordance with the SALP procedure, many of the violations/construction deficiencies incorporated in the report to support the conclusions would not have been used in the evaluation procedure. CP&L, therefore, believes that the report does not accurately reflect performance in 1981, which is the 12 month period that should have been used in the evaluation. The choice of the 18 month period also fails to portray the improvements that occurred during 1981 when violations dropped significantly compared to the last 6 months of 1980 when the enforcement events cited in the SALP report occurred. Failure to follow the procedure by incorporating 18 months of enforcement history in an annual assessment thus presents a biased picture of enforcement activity.

2. The SALP Procedure further requires both positive and negative aspects of licensee performance to be considered. The language of the report cites almost no positive attributes even where multiple inspections by Region II inspectors and the Resident Inspector found no violations. The lack of reference to positive attributes is even more noteworthy when it is considered that information presented by the NRC at the SALP meeting between CP&L and the NRC indicated CP&L had the lowest number of construction violations (three) in Severity Levels IV and V of any utility in the region. Information presented at the meeting also showed Harris Unit 1 had eleven construction deficiency reports and Harris Unit 2 had eight, against a Region II average of 51. The lack of mention of this information denies the Report reader an opportunity to gain a balanced perspective that includes positive attributes. This would not have been the case if the assessment procedure had been followed more precisely and included factual, positive attributes.

3. The format of the report doesn't agree with the NRC's description in the March 1982 Federal Register Notice of how the assessment will be conducted. Federal Register Notice Paragraph b. "Procedures" states that, "The SALP Board assesses licensee performance in each of a number of functional areas, . . .". However, in the SALP Board Report for CP&L, in each functional area, after Paragraph a. "Analysis", there appears Paragraph b. "Conclusion", in each case followed by Paragraph c. "Board Comments": "The Board concurs with the rating . . ." If the Board always concurs with the rating, it is not clear who they are concurring with or who is recommending the conclusion in Paragraph b. Since this document is entitled the SALP Board Assessment, we recommend that Paragraphs "b" and "c" be merged so that Paragraph b. represents the "Board's Conclusion". This would eliminate the appearance of a recommended rating to the Board from unnamed parties.

4. The assessment procedure states that quality assurance is an element of each functional area to be highlighted in a separate discussion only when there is a problem. Carolina Power & Light Company considers that a separate discussion of quality assurance as a functional area implies a problem that is not supported by the facts in the report. Quality assurance functions were inspected 24 times by the NRC during the assessment period. Only three nonrepetitive minor violations were found. Again, CP&L considers that by not following the assessment procedure more precisely, an unfair inference is being directed toward CP&L's quality assurance program and the professionals who administer it.

5. The SALP procedure states that "if information is scarce or nonexistent, a decision as to performance as it relates to an attribute will not be forced." CP&L believes that the NRC Staff and SALP Board failed to adhere to this principle in at least the following instances:

   a. The analysis of performance in the functional area of Site Preparation and Foundations makes reference to one violation resulting from three regional inspections and an unspecified number of Resident Inspector inspections. The single violation referenced is for failure to control dust at the site. CP&L would like to

point out that the violation for excess dust was in the area of environmental inspection against commitments in the Environmental Report. Inclusion of this violation in the Site Preparation and Foundation functional area (where no other violations were cited in the report) has the effect of forcing a decision as to performance in a functional area when no negative attributes were evident. In fact, available information points toward a Category 1 rating if it is recognized no other negative attributes were evident during the evaluation period.

b. The analysis of the functional area of Design and Design Changes acknowledges that no violations were found in one NRC inspection performed in this area. The analysis goes on to cite a CP&L reported item concerning failure to have sufficient interface control between the design engineer and the NSSS supplier. The design interface problem found by CP&L QA could just as easily be used to support a positive conclusion. It demonstrated that CP&L is a leader in design interface audits and that management attention and involvement are aggressive in this area and oriented toward nuclear safety.

c. The conclusions reached in the functional area of procurement depend in part on observations of housekeeping and cleanliness in the power block area.

6. It is not readily apparent that the procedure was followed with respect to use of the evaluation guidelines in Table 1. Although departures from the guidelines are sometimes allowed by the procedure, the rationale for the departures are required to be explained in the report. The use of the evaluation criteria would allow consideration of elements of CP&L's management other than enforcement history items. Several actions by CP&L over the past year should be recognized in any assessment of performance at the Harris site, including:

a. Start-up personnel were assigned to the site in permanent offices when the project was only 50% complete. The early commitment of personnel should minimize start-up problems, and lead to improved equipment operability and maintenance.

b. Nuclear Plant Engineering personnel have been located at site to coordinate all aspects of design and to insure support for construction and quality assurance.

c. A human engineering review and modification of the Main Control Boards is already complete.

d. The Harris Construction Site has maintained an admirable industrial safety record.

In summary, CP&L has taken strong, positive actions to assure a high level of performance at the Harris site. The low number of violations and the progressively lower number of reportable items is evidence of those efforts. The NRC's assessment is one sided and does not reflect the high level of achievement attained at Harris.

Specific Comments

1. Quality Assurance (NRC Category 2)

The violations listed in this area which occurred on July 7-11, 1980 and September 29 - October 3, 1980 are minor and are insignificant when the amount of inspection activity is considered. CP&L has, according to Region II statistics, the lowest number of utility construction violations in the Region. The assessment in this area appears to be too low and should be Category 1.

2. Site Preparation and Foundation (NRC Category 2)

The violation cited on July 14-16, 1980 is taken out of context and presents a distorted view (See General Comments). The one violation

cited in the Board's assessment was not in the area of Site Preparation and Foundation, but was based on an Environmental Condition of the Construction Permit to avoid unnecessary dust as a result of construction activities. Inclusion of this dust control citation in the Site Preparation and Foundation functional area (where no other violations were cited in the Board's Assessment) has the effect of forcing a decision as to performance in this functional area when no negative attributes were evident.

The Board's assessment makes no mention of the good performance CP&L has exhibited in the area of Site Preparation and Foundations. Also, Carolina Power & Light Company has taken significant action with respect to dust control since mid-1981 and achieved excellent results. The report ignores this achievement. In view of these facts, the assessment in this area appears to be too low and should be Category 1.

3. Containment Structure (NRC Category 2)

No comment.

4. Safety-Related Structures (NRC Category 2)

No comment.

5. Piping and Hangers (NRC Category 2)

No comment

6. Safety-Related Components (NRC Category 2)

No comment

7. Electrical Systems (NRC Category 2)

No comment

8. Instrumentation and Wire (NRC Category 2)

No comment

9. Fire Protection (NRC Category 2)

The Report notes three inspections and no violations. The assessment in this area appears to be too low and should be Category 1.

10. Preservice Inspection (Not evaluated by the Board)

11. Corrective Actions and Reporting (NRC Category 2)

The Report only notes one violation on December 2-5, 1980 and states that since early 1981, there has been a significant decrease in the number of events identified at the Harris site through the Design Deficiency Reports and Part 21 reporting system when compared to the previous number of reports. This performance seems indicative of an extremely well run project. The assessment in this area appears to be too low and should, therefore, be Category 1.

12. Procurement (NRC Category 2)

See General Comments

13. Design and Design Changes (NRC Category 2)

See General Comments

14. Training (NRC Category 2)

No comment

DETAILED REMARKS CONCERNING
H. B. ROBINSON UNIT 2

The following detailed remarks are provided concerning the Performance Analysis and Activities contained within the report for H. B. Robinson:

General

As detailed in the General Remarks for the Shearon Harris Plant (Attachment 1), CP&L believes that the SALP Report is unbalanced due to its almost exclusive reliance on enforcement history. This is in conflict with the SALP procedure (Federal Register 3/22/82).

The SALP Report repeatedly references violations as a measure of unit performance. Yet in the case of H. B. Robinson, when few or no violations occurred in an area an average rating was given. The standard being used by the Report, therefore, is contradictory and impossible to perceive.

Finally, though only contained in one area, CP&L wishes to object to the classification of Confirmation of Action letters as Escalated Enforcement Actions. This is contrary to the nature of these letters especially for the one cited in Section 19 which deals with Emergency Planning. CP&L believes that the inclusion of these letters adds to the unbalanced aspect of the report.

Specific Areas

1. Plant Operations (NRC Category 2)

Although CP&L does not take issue with the numerical rating within this area we would like to comment on the analysis. Specifically the

statement that "...the licensee has had problems in adhering to Technical Specification requirements..." is misleading. Only two of the twelve violations cited pertain to equipment or system inadequacies related to Limiting Conditions of Operation (LCO). The remainder identify weakness in a programmatic or procedural sense. However, as stated, the analysis infers that "operational" requirements (LCOs) of the Technical Specifications were not met to a substantial degree, when in fact this is not the case.

A good portion of the analysis is devoted to an apparent "...weakness in fulfilling commitments of post-TMI equipment installations...". While we acknowledge that equipment was removed from service for extended periods of time, it should also be noted that the underlying reason was that little guidance was provided by NRC on how the equipment was to be operated. NRC requirements for installation were very clear, however, the followup on NRC operational requirements was generally lacking.

We do wish to point out that CP&L was recognized by Mr. H. R. Denton as one of the few utilities who met the installation requirements for the equipment.

Carolina Power & Light Company concurs with the Board's rating.

2. Refueling Operations (NRC Category 2)

During the assessment period, CP&L performed massive amounts of NRC mandated work during refueling outages (Fire Protection, TMI Modifications, Responses to I&E Bulletins 79-02, 79-14, etc.). The NRC found no violations or deviations in these areas. This was a substantial achievement at significant financial expense. CP&L, therefore, believes that the assessment in this area does not reflect this fact and this actually should be defined as Category 1.

3. Maintenance (NRC Category 2)

No Comment

4. Surveillance (NRC Category 2 or 3)*

The Report notes that no violations or deviations were found with regard to Inservice Testing. The report cites two minor violations on April 11 - May 10, 1981 and a deviation with respect to Surveillance Testing. No comparison of these minor infractions to the great number of periodic tests conducted correctly during the evaluation period is shown in the report. We have been advised that the rating contained in the Report is a typographical error and that the "Category 2" rating which appears in the Summary on Page 3 of the Report is correct. We would, therefore, request that the analysis portion of the Report be corrected to show a Category 2 rating.

5. Personnel, Training, and Plant Procedures (NRC Category 3)

The following additional information should be considered when discussing this area:

a. With respect to Violation (9) on March 11 - April 10, 1981 concerning operator training, in addition to correcting the specific problem cited, Corporate Training now formally audits and documents Reactor Operator Requalification Lecture requirements. This is an example of CP&L's consistent effort to go beyond the correcting of a specific deficiency and to provide a programmatic solution to correct the weakness.

* SALP Report lists Category 2 on Page 3, but Category 3 on Page 23.

b. As stated in the Brunswick response, the statistics quoted for this period with respect to passing of licensing examinations are consistent with the industry trend at the time. These statistics reflect the increased emphasis and elevated passing requirements imposed on Operator Licensing examinations following the accident at TMI. During 1981, a significant improvement in examination performance has been achieved with four out of five (80%) Reactor Operators successfully passing the licensing examination. Although not in this assessment period, it should be noted that in 1982, 100% of the Senior Reactor Operators passed their license examinations. These statistics represent accomplishments above present industry trends.

For these reasons, the Board's assessment appears too low and should be Category 2.

6. Fire Protection and Housekeeping (NRC Category 2)

In this area, the SALP Report notes two minor infractions on September 29 - October 2, 1980 regarding inadequate storage of fire protection equipment and components and failure to follow requirements of fire prevention welding procedure. The report fails to recognize the massive effort undertaken by CP&L to implement the fire protection program at the plant, the large number of related modifications installed and completed and the tremendous efforts to restore cleanliness and housekeeping following these large construction projects. In addition, significant organization improvements, which include 24-hour coverage by a Fire Protection Technician, were implemented which we feel places CP&L and H. B. Robinson as one of the industry leaders in the area of fire protection. CP&L believes that when these factors are taken into account, the assessment in this area should be a Category 1.

7. Design Changes and Modifications (NRC Category 2)

The SALP Report notes no violations in this area. It fails to provide credit with respect to the large number of modifications completed during the period when no violations were noted. Additionally, CP&L feels that a significant achievement which occurred during the period about which the Report is silent is the major revision and upgrading of the Modification Control Procedures which were implemented on October 30, 1981 at Robinson. This has resulted in a substantial improvement in the control of these activities. Because of its significance, it is felt that this should have been considered in the analysis. When viewed in this context, CP&L believes that the assessment in this area should be a Category 1.

8. Radiation Protection, Radioactive Waste Management, and Transportation (NRC Category 3)

Although there may have been problems in this area at the beginning of the evaluation period, CP&L has made substantial improvements during the period, and instituted effective corrective actions in this area which have resulted in vastly improved performance. CP&L believes that the Report should also include these positive activities in addition to the shortcomings which were noted. Specifically, the ALARA program at the plant is in a large part responsible for a 30% reduction in exposure received on Steam Generator inspection and repair efforts between the years 1980 and 1981. Efforts in the area of contamination controls has reduced personnel contamination events by a factor of more than 3 from 1980 to 1981 and, the plant's General Employee Training (GET) which provides orientation training in the area of Health Physics has been expanded in content by approximately 300 percent. These major improvements all occurred during the SALP period but were omitted from the report.

For these reasons, the Board's assessment appears too low and should be Category 2.

9. Environmental Protection (NRC Category 1)

No Comment

10. Emergency Preparedness (NRC Category 2)

The SALP Report states that improvement in Emergency Preparedness was achieved in 1981. This is a considerable understatement when the massive numbers of new requirements, new facilities, and new capabilities which were instituted during this time period is reviewed. CP&L was extremely aggressive and responsive in addressing these new requirements and continually leading the industry in compliance and fulfilling regulatory commitments and requirements. Specifically, CP&L was the first licensee to conduct a "full scale" Emergency Exercise to the post-TMI emergency preparedness requirements in the State of South Carolina. In fact, it was this full scale exercise which was used to qualify the South Carolina Emergency Plan. The Report is silent on those efforts and does not accurately reflect the amount of management attention and CP&L resources devoted to Emergency Planning; however, CP&L concurs with the Board's overall rating of Category 2.

11. Security and Safeguards (NRC Category 2)

No Comment

12. Audits, Review, and Committee Activities (NRC Category 2)

The Report notes five inspections and no violations. Given the high inspection activity in this area and no violations, the assessment appears to be too low. Additionally, CP&L has made organizational improvements with respect to Onsite Nuclear Safety Review and Quality Assurance Activities. During the period, the onsite Quality Assurance organization at H. B. Robinson has more than doubled in size and now

reports offsite. This has substantially improved the independence and effectiveness of this function. Additionally, Quality Assurance is now conducted under one corporate department which provides consistency throughout the Company in the Quality Assurance area. Other improvements in this area were delayed due to NRC's untimely issuance of revised Administrative Technical Specifications which were submitted for approval one year ago. The Report should have given greater emphasis to these changes. CP&L believes that this area should be assessed as Category 1.

13. Administrative, QA, and Records (NRC Category 2)

No Comment

14. Corrective Actions and Reporting (NRC Category 2)

The report states that CP&L has been reluctant and slow to correct deficiencies in TMI required equipment. No basis for this statement is provided. CP&L, in fact, has been extremely responsive with respect to TMI modifications. CP&L also has paid heavily in several cases due to being the leader in the industry in installing modifications only to have NRC change the requirements and invalidate the effort. CP&L was cited as a positive example by H. R. Denton for our responsiveness in meeting the initial TMI Short Term Lessons Learned requirements and has continued to be an industry leader in responding to TMI concerns. In view of this history, no violations in this area, and the very positive comments in the analysis, the assessment of the report appears to be too low and should be assessed as Category 1.

DETAILED REMARKS CONCERNING
BRUNSWICK UNITS 1 & 2

The following detailed remarks are provided concerning the Performance Analysis and Activities contained within the Report for Brunswick Units 1 and 2:

General

As detailed in the General Remarks for the Shearon Harris Plant (Attachment 1), CP&L believes that the SALP Report is unbalanced due to its almost exclusive reliance on enforcement history which is in conflict with the SALP procedure (Federal Register 3/22/82). The Report repeatedly references violations as a measure of station performance. It should be noted, however, that data provided by the NRC on May 28, 1982 indicate that the Brunswick units incurred an average of 21 Level IV and V violations/unit which was less than the Region average of 22 violations/unit. Additionally, in comparison with comparable or "sister" plants, the number of BSEP violations was far less than the average of 29/unit derived from Gray Book data. A further assessment of the number of violations per inspector hour indicates that there were fewer inspector hours/violation for other plants in the southeast than associated with BSEP operations.

The previous SALP report made a point of looking forward beyond the evaluation period due to problems experienced with Brunswick's Auxiliary Boiler. This Report, however, does not look forward beyond the evaluation period to the many improvements and improving record of Brunswick but chooses to again concentrate on the Auxiliary Boiler problem and a few other incidents. This is inconsistent and presents a distorted view. The report should be changed to correct this view.

Specific Areas

1.0 Operations (NRC Category 3)

The SALP report indicated that the Brunswick units had incurred "significant plant outage time" due to plant operations errors during the evaluation period. CP&L disagrees with this conclusion as substantiated by the following data applicable to the SALP assessment period:

Unit 1 Outage Time

. Force Off Line

. Equipment/Other = 745 hours

. Personnel Error = 0 hours

Subtotal = 745 hours

. Maintenance Offline

Subtotal = 300 hours

. Planned Outages

. Outage in Progress = 1992 hours

. Turbine Lube Oil Outage = 1863 hours

. Planned Maintenance Outage = 1960 hours

Subtotal = 5815 hours

. Total Offline Hours - 6860 hours

. Personnel Error = 0% of total Off Line Hours

Unit 2 Outage Time

. Forced Off Line

. Equipment/Other = 2857 hours

. Personnel Error = 191 hours

Subtotal = 3048 hours

. Maintenance Off Line

Subtotal = 637 hours

. Planned Maintenance Outage

. Outage in Progress = 2603 hours

Subtotal = 2464 hours

. Total Off Line Hours = 5513

. Personnel Error = 3.5% of total Off Line Hours

The above statistics disprove the Report's conclusions and the Report should be altered to correct this incorrect conclusion.

The number of personnel errors incurred is proportional to the level of activities that plant personnel participate in which challenge their own individual abilities. Typical activities or challenges encompass surveillance testing and response to equipment malfunctions as examples. In reviewing the NRC data presented in the SALP review meeting, the number of BSEP Unit No. 2 personnel errors exceeded the average by approximately 2.5 times. This was not to be unexpected in comparing the number of equipment malfunctions to the industry average. As the NRC also pointed out in reviewing H. B. Robinson performance, the number of surveillances required for a non-standard technical specification plant was about 17,000 activities/year as compared to a standard technical specification plant which requires about 170,000 surveillances/year. This comparison alone illustrates a vulnerability for personnel errors of approximately ten times that of any other BWR in the country except Hatch Unit No. 2. A further comparison of NRC supplied LER data also illustrates that the performance of the Brunswick units does not indicate a disproportionate comparison, percentage-wise, with other BWRs in any category, including personnel errors.

It should further be noted in response to recognized operating problems that the format of our Auxiliary Operator training program was expanded to provide more specific plant-related training information. We also restructured our organization to provide dedicated personnel to the respective units, with a view towards enhancing pride-of-ownership and consequently, improved operations performance. Neither activity was recognized as a positive management action in assessing operational performance.

Additionally, the following positive steps have been taken by CP&L to improve Brunswick operations:

a. New symptom-based emergency procedures have been developed by the Brunswick Plant. These procedures represent a pioneer effort from an industry point of view.

b. The BSEP Operating Staff is currently on a five-shift rotation and will be staffed for a six-shift rotation late this year. This has provided extra shifts to provide better training and relief coverage. An additional partial seventh shift is planned to anticipate any attrition or sickness.

c. Organization changes have been made in the last six months to further enhance better supervision of operators by increasing the Shift Foreman to Operator ratio.

d. The staff organization has been strengthened to provide better control of plant modification work.

e. An aggressive program has been implemented to license as many members of the plant staff as possible. In addition, a stronger on-the-job training program has been initiated.

f. Licensed operator retraining has been expanded. This expansion includes both more classroom time and added simulator time.

g. During the last three years, CP&L's basic AO training program has been significantly enhanced to train people of mixed educational background.

h. During the evaluation period, Brunswick hired and trained 30 percent more people than the BSEP organization required, in order to provide experienced people to staff the Harris Plant. Although this training program reduced the supervisor-to-operator ratio, and increased the number of less experienced people doing tasks, the long-term benefit will be positive in that a large number of experienced personnel will start up and operate the Harris Plant. This ambitious training program initially provided increased opportunities for operator error; however, these Harris operators are now trained and will be transferring off-site soon, returning the BSEP staff to the desired supervisor-to-operator ratio.

CP&L concurs, however, with the Board's overall assessment of Category 3.

2. Refueling Operations (Not evaluated by the NRC.)

3. Maintenance (NRC Category 3)

CP&L disagrees with the SALP Report's finding that the plant experienced significant down time due to inadequate maintenance. CP&L believes that the following areas should be clarified:

a. Hydraulic Snubbers

CP&L disagrees with the SALP report's conclusion that "...many (hydraulic snubber) failures were caused by previous inadequate maintenance." This finding fails to recognize that detailed maintenance and periodic testing procedures had been developed and implemented prior to the 1981 snubber failures. Many aspects of these procedures were based upon direct input from both the snubber manufacturers (Bergen-Paterson and Grinnell) and the NRC. Additionally, the NRC had provided close scrutiny of the Brunswick Plant hydraulic snubber inspection and maintenance program through periodic on-site reviews by Region II personnel prior to the 1981 snubber failures. The maintenance program in effect in March 1981 included carefully detailed periodic tests for hydraulic snubber visual inspection and functional testing and equally precise maintenance instructions for the disassembly and rebuilding of the units. These periodic inspections and tests were scheduled and rigorously performed throughout the period prior to the 1981 inspection. As a result of these programs, the rate of hydraulic snubber visual inspection failures demonstrated an overall decrease, indicating that maintenance performed on the installed units was indeed adequate. The functional testing of snubbers prior to 1981 had not shown a high failure rate and only a limited number of snubbers were required by technical specifications to be functionally tested to ensure statistically that a high confidence in snubber performance could be expected. As a result of the 1981 inspection, testing and analysis of the failures concluded that the

design of the snubber was inadequate due to long-term wear of valve block related components. BSEP Licensee Event Report 81-041 provided a detailed report of the snubber failures during that 1981 inspection program and identified design inadequacies as the primary cause of the failures. This finding resulted in total replacement or refurbishing of the hydraulic snubbers with improved component parts.

b. Chlorination

CP&L disagrees with the NRC finding that "...the Service Water System was removed from service for maintenance and remained out of operation for approximately six months. This resulted in an excessive buildup of oysters..." This NRC finding is not consistent with the order of events which actually transpired and which were documented in detail by a separate NRC document, "Report on Service Water System Flow Blockages by Bivalve Mollusks at Arkansas Nuclear One and and Brunswick" issued February 19, 1982, by the NRC Office for Analysis and Evaluation of Operational Data. The actual events impacting the chlorination system resulted in the system being out of operations for 14 months, not 6 months. The system was removed from service during the spring/summer 1980 outage for personnel safety considerations involved with inspection activities being performed on service water piping near the intake (and chlorine system) area. During this outage, a fine mesh screen was added to one bay of the circulating water intake structure to reduce fish entrainment. This temporary feature necessitated continuous screen washing. After correcting a series of mechanical and electrical problems, the chlorination system was placed in service in November 1980 for only a short period of time. Due to the proximity of the chlorination system piping and the screen wash pump suction, highly chlorinated water was taken up by the screen wash system and resulted in an unacceptably high fish kill. Appropriate modifications were completed at the intake structure to eliminate this problem, but continuous chlorination was not again reinitiated until May 1981—14 months later, not 6. The contributing factors to

this inoperable period are more accurately categorized as design-related problems and personnel safety rather than inadequate maintenance.

According to the Senior Resident Inspector at the time, the NRC had initially intended to formally document the operations response to the oyster shell/RHR occurrence as demonstrating exceptional ingenuity and resourcefulness due to the techniques which had to be implemented in response to the event.

This recognition is not contained in the Report.

c. General - Contrary to the statement indicating a pending increase in the number of maintenance foremen, CP&L has completed all anticipated reorganizational changes within the maintenance unit. The current staffing and organizational structure provides approximately a 12 to 1 technician to foreman ratio which is consistent with recognized industry standards. This organizational change was completed in June 1981, with many staff positions filled as a result of internal Company transfers. It is anticipated that the incorporation of this expanded experience base will be another positive contribution to improved plant performance and reliability.

Additionally the report is incorrect with regard to Unit 1 outage time. Unit No. 1 did not remain shut down from April 17 through the "end of the evaluation period." The unit recommenced power operations in September 1981 and has operated almost continuously since that time.

The Report should also recognize that Unit No. 2 established a continuous generation record during this evaluation period.

For these reasons, the Board's assessment appears too low and should be Category 2.

4. Surveillance and Inservice Testing (NRC Category 2)

This section of the SALP Report concentrates on a violation on June 5 - 11, 1981 in connection with the Containment Integrated Leak Rate Test (ILRT) performed in June, 1981. The following additional comments are necessary in order to place that violation in perspective:

In accordance with the requirements of Technical Specification 6.8.1, a written procedure was implemented specifically for the performance of the ILRT in accordance with 10CFR50, Appendix J. The first operational ILRT procedure was written and plant approved in October, 1977, in anticipation of the ILRT performed in December of 1977. The procedure was reviewed without comment by an NRC inspector during the performance of Brunswick Unit No. 2's first operational ILRT in 1977. It had, therefore, been CP&L's understanding that its procedure, as written, reflected a valid interpretation of Appendix J and provided for ILRT testing in accordance with requirements of Appendix J.

The general procedure used for the Brunswick Unit No. 1 ILRT in June, 1981 was identical to the earlier version and required no substantive changes due to the similarity of plant design. CP&L was unaware of the NRC's concerns over venting and draining of systems until the day before the scheduled Brunswick Unit No. 1 ILRT at which time an IE inspector revealed to CP&L the existence of an unpublished internal NRC document which contained an interpretation of Appendix J different from that previously communicated to CP&L.

Once it became aware of this document, CP&L made an effort to reach agreement with the NRC inspector concerning the proper implementation of the requirements for venting and draining included in 10CFR50 Appendix J. As a result of this effort, CP&L performed a review of the containment penetrations and modified the test to include the NRC's requested lineup for venting and draining where feasible. This review was completed as expeditiously as possible although a delay in commencing the test necessarily resulted.

Both the interpretation of Appendix J underlying CP&L's procedure and the interpretation set forth in the NRC document are reasonable constructions of Appendix J. In light of this and the fact that CP&L's procedure had been reviewed by NRC, the reinterpretation was not a proper ground upon which to allege a violation by CP&L unless and until CP&L had been given adequate notice of the reinterpretation.

CP&L concurs, however, with the overall assessment by the Board of Category 2.

5. Personnel, Training, and Plant Procedures (NRC Category 3)

a. QA Training

Corrective action has been taken to correct the areas discussed in the two violations on October 20 - 24 and October 27 - 31, 1980. Additionally Corporate Nuclear Safety & Research has been reorganized to provide onsite units and all QA functions have been organized into a single Corporate Quality Assurance Department. These improvements are positive steps which will improve this area.

b. Operator Training

The Report provides no statistical basis for comparison of passing grades on licensing examinations. The results presented, however, are indicative of industry trends in this time period due to increased requirements for satisfactory performance established following the TMI Accident. Performance on licensing examinations has improved significantly and in 1981, 21 out of 29 Reactor

Operators passed and 5 out of 5 Senior Reactor Operators passed their examinations. This is considered to be above the industry's average.

c. Procedures

CP&L has taken or is taking the following positive steps to significantly improve performance in the procedures area at Brunswick (BSEP):

1) Brunswick Steam Electric Plant is presently developing a series of procedures to delineate actions to place instruments in a tripped condition when required by technical specfications. This will include cross-references from technical specifications to drawings, to instruments, and logic-type references. Brunswick Steam Electric Plant is believed to be the first plant developing this type comprehensive procedure.

2) As a part of the Plant Modification improvement effort, many Operating Procedures have been revised over the past six months.

3) Over the last two years, all System Descriptions have been extensively rewritten to bring them up to date.

4) Procedural changes require that procedures be in place when a modification is declared operational.

5) It is presently planned to initiate an extensive effort to update plant Operating Procedures. This is in addition to routine updates to incorporate comments, or Plant Modifications.

CP&L concurs, however, with the Board's overall assessment of Category 3.

6. Fire Protection and Housekeeping (NRC Category 3)

a. Fire Protection

CP&L disagrees that the Category 3 evaluation of the Brunswick fire protection program is an accurate assessment. Brunswick plant has historically been in the vanguard of nuclear utility fire protection program development and implementation. This leadership has been demonstrated most notably by Brunswick's becoming the first and one of the few plants to receive a fully approved fire protection safety evaluation report (SER) from the office of NRR. Brunswick's leadership has also been demonstrated by its fire protection organization. Brunswick was one of the first plants to recognize that system surveillance testing, modification design review, fire brigade training, and other fire protection functions could be best accomplished by integration into a single organization dedicated to fire protection work and staffed by personnel trained and qualified in all areas of fire protection. This concept was initially implemented utilizing a staff of contractors supervised by qualified company personnel. The success of this program resulted in staffing the organization with company personnel with appropriate experience and formal training. Brunswick has also been a pacesetter in other fire protection areas, such as in technical specification development; its fire protection program is well known in the industry. Carolina Power & Light Company believes Brunswick to be a leader in the Fire Protection field, that the violations cited are minor when compared to the scope of the program and that the assessment provided by the NRC is inaccurate and undeserved.

b. Housekeeping

The Report fails to mention plant cleanliness or housekeeping. This aspect of Brunswick plant operations has been recognized by INPO and other auditing groups as being "very good." Such observations have also been shared by NRC inspectors.

For these reasons, the Board's assessment appears too low and should be Category 2.

7. Design Changes and Modifications (NRC Category 2)

No comment

8. Radiation Protection, Radioactive Waste Management and Transportation (NRC Category 3)

a. Radiation Protection

The following information is necessary to place in perspective the violations cited:

1) Violation (3) Dated July 27 - 29, 1981: Violation for assigning a radiation control technician to a position of responsibility with less than minimum experience required by Technical Specifications.

This violation was contested by CP&L at the time of the assessment of the violation. CP&L believes the violation to be a matter of interpretation.

2) Violation (4) Dated November 16, 1980 - May 8, 1981: Relates to evaluations of radioactive releases from the auxiliary boiler.

These incidents and evaluations occurred prior to the evaluation period.

3) Violation (7) Dated November 16, 1980 - May 8, 1981: Violation for not properly notifying NRC operations of an unplanned release of radioactivity from the auxiliary boiler. This violation exisced prior to the evaluation period.

4) Violation (9) Dated November 16, 1980 - May 8, 1981: Violation for not including certain liquid and gaseous releases in the facility's semiannual effluent release report. This situation existed prior to the evaluation period. This has since been corrected. Citing this violation in the SALP Report is equivalent to double jeopardy.

5) Violation (10) Dated December 8 - 19, 1980: Failure to take adequate breathing zone air sample. This was a violation subject to some significant interpretation by the inspector.

6) Violation (12) Dated December 8 - 19, 1980: Violation for not following procedures controlling the release of radioactive material outside the Radiation Control Area. This should not be listed as a violation since this item was denied by CP&L as a violation and has never been responded to by the NRC either in a response to the IE report or to a special request made of NRR to interpret the situation. CP&L has not received a NRC response to either inquiry.

The subject report makes reference to the Health Physics Appraisal Team reviews which identified weaknesses in internal exposure control, contamination control, liquids, radwaste management, and routine surveillance of operating parameters. They also found strengths in some of these same areas. To present only the weaknesses and violations attributed to the program is not a balanced review of the program. Attached are items included in a recent NRC radiological assessment program for the industry which Brunswick was credited for having outstanding practices in certain areas. Also attached are exerpts from a recent INPO report.

b. Radwaste Management

The SALP Report fails to recognize the substantial progress made in reducing waste generation. Solid waste generation has been reduced from approximately 21,000 ft^3/month to approximately 8,000 ft^2/month

during non-outage periods. Further progress is expected pending return of various pieces of process equipment to service.

c. General

While pointing out the difficulties incurred by CP&L in this area, the report fails to show the substantial progress made by CP&L in this area. CP&L considers its Radiation Protection Program now in place to be one of the best in the country.

For these reasons, the Board's assessment appears too low and should be Category 2.

EXCERPTS FROM HEALTH PHYSICS APPRAISAL RPOGRAM (NUREG 0855)

Examples of Gcod Training

Since the most frequently observed weakness was failure tc provide adequate training for radiation protection technicians, a number of examples of good approaches to training are given below.

A few utilities have made a substantial committment to training. Health physics technician training for Carolina Power and Light is highly formalized in conjunction with the utility's Nuclear Training Section located near Raleigh, N. C. Technicians are removed from the job pressures and provided an uninterrupted classroom and laboratory work environment, staffed by well-qualified professional educators. There appeared to be a close liaison between the corporate training center and the individual plant training group.

EXCERPTS FROM HEALTH PHYSICS APPRAISAL RPOGRAM (NUREG 0855)

Examples of Good Internal Exposure Control

The calibration and utilization of the whole-body/thyroid/lung counter at the Maine Yankee Nuclear Power Station was found to be exceptional. This finding is based on the following elements of the licensee's in vivo counting program: performance of daily background and radioisotopic source checks on the whole-body/thyroid/lung counter; performance of a semi-annual electronic/ radioisotopic calibration on the counter; frequency of the routine in vivo counting program; competence of the health physics department staff member performing in vivo counting; and analysis of in vivo data by the Health Physics Department management.

As a result of previously identified contamination program weaknesses, and resultant positive, responsive improvements, the Brunswick Units 1 & 2 site's, ...ram ensuring adequate personnel contamination surveys was found excep-...nal. Personal survey instruments (friskers) were calibrated both electronically and to a radiation source, and functionally checked at least daily and usually each shift. Frisker stations were located at exits from the radiation control areas and at selected places inside. Survey areas were shielded, if required, to reduce background radiation levels. Each frisker station was continuously manned by a "frisker watcher" who was instructed to observe each individual surveying to ensure that each one performed an adequate survey and that hand-carried objects were either surveyed or had a valid health physics survey release form. The frisker watchers were trained in appropriate survey techniques such as speed of probe movement and distance from surveyed surface to detector window. The portions of the body to be surveyed depended on the area being exited. Each station was prominently identified with the extent of survey required, such as hands and feet, whole body, and so forth.

Example of Good Surveillance

A high-quality instrumentation performance program was noted at Brunswick Units 1 and 2 in that a functional check of all portable instruments was done as recommended by ANSI N323-1979. Each normal working day and within 24 hours before use of portable instruments not routinely used, each instrument was returned to the calibration facility. It was visually inspected, a battery check was made, and it was response tested at points on each range using a Cs-137 well source. A checklist, used to record data, provided the acceptable response range. Those instruments not responding as required were removed from service until repaired and/or recalibrated.

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Examples of Good Selection and Qualification Criteria

Several plants were noted to have developed and implemented selection and qualification criteria. The Farley and Browns Ferry plants had documented selection and qualification criteria for each position in their radiation protection organizations. These criteria related to job descriptions, included formal training and experience factors, and were used as standards for hiring and promotions. The Brunswick plant used job descriptions for each position category within the radiation organization. These descriptions were detailed and comprehensive and provided an excellent basis for performance evaluation as well as guidelines for job requirements at each proficiency level.

EXCERPTS FROM 1981 INPO EVALUATION AT BRUNSWICK PLANT

EXTERNAL RADIATION EXPOSURE

PERFORMANCE OBJECTIVE: Minimize personnel external radiation exposure.

Finding (RC.4-1)

The following Good Practice was noted: Laminated drawings with isometric views of plant areas and equipment with their associated radiation levels are posted throughout the reactor building.

Finding (RC.4-2)

The following Good Practice was noted: An "ALARA Problem" identification system, with appropriate follow-up by the ALARA committee, is functioning to minimize sources of radiation exposure within the plant. "ALARA Problem" forms are located throughout the plant so that any worker can submit suggestions for radiation exposure reduction. The ALARA committee reviews the suggestions and, where appropriate, assigns a committee member to complete additional investigation and action to implement worthwhile improvements.

CHEMISTRY

PERFORMANCE OBJECTIVE: Ensure accurate measurement and effective control of chemistry parameters.

Finding (RC.10-1)

The following Good Practice was noted: A corporate quality control program, which includes spiked samples, has been established to frequently check the performance of laboratory equipment and individual technicians and the adequacy of chemistry procedures.

RADIATION PROTECTION AND CHEMISTRY

MANAGEMENT OF RADIOLOGICAL PROTECTION

PERFORMANCE OBJECTIVE: Provide effective management of the radiological protection program..

Finding (RC.1-1)

The following Good Practice was noted: Plant management receives a weekly update of radiological protection and chemistry trends. Items such as the number of contaminated areas within the plant, the number of personnel skin contaminations, the number and volume of radioactive waste shipments, radioactive environmental releases, and major plant chemistry parameters are included.

9. Environmental Protection (NRC Category 3)

The following information is necessary to place the violations cited within the proper perspective:

a. Violation 1 Dated April 21 - 24, 1981: Failure to implement automatic intermittent surface water sampling at the intake canal.

The assessment that a sampling program had never been implemented is not true. Grab samples were taken as required by Technical Specifications from the origination of the requirement. A statement to the contrary is definitely not warranted.

b. Violation 2 Dated April 21 - 24, 1981: Failure to provide quality assurance procedures for monitoring sampling collection, sample analysis required by Technical Specifications is not accurate. The licensee did not attach calibration stickers to the meters.

The calibrations were done and were available for the inspector to review which he did. To state that there were no calibration procedures for these monitors is incorrect.

c. Violation 3 Dated April 21 - 24, 1981: Failure to notify the Commission within 30 days as required in Technical Specifications when a sample point was dropped from the surveillance program.

The point was dropped basically because there was no cow and therefore no sample existed. CP&L, however, acknowledges that it should have informed the NRC that this sampling point was no longer feasible.

d. Violation 4 Dated April 21 - 24, 1981: Failure of the Harris Energy and Environmental Center to effectively manage temporary procedure changes. This did not relate to the Brunswick plant operation.

The conclusion of a category 3 rating cannot be justified based on the above evaluations and inspections. With respect to the absence

of the water sampler from the intake canal, BSEP was meeting the requirements of the Technical Specifications by performing grab samples. The other violations are primarily clerical in nature and do not represent any substantial deviation from NRC requirements, nor any compromise of the public health and safety.

For these reasons, the Board's assessment appears too low and should be Category 2.

10. Emergency Preparedness (NRC Category 2)

The SALP Report fails to acknowledge the aggressive and assertive actions CP&L has taken to meet the vastly increased requirements (e.g. drills, revised plans, new facilities) in this area and the timeliness of our actions. Our planned program is being utilized as a model by other utilities in the Region. The report is silent on these issues. Attached are exerts from a recent INPO evaluation of the Brunswick Program. In view of these facts, CP&L believes that the rating in this area should be Category 1.

INPO

Institute of
Nuclear Power
Operations

1820 Water Place
Atlanta, Georgia 30339
Telephone 404 953-3600

Rec'd 6/14/82

June 10, 1982

Mr. E. E. Utley
Executive Vice President
Carolina Power & Light Company
P. O. Box 1551
Raleigh, N.C. 27602

Dear Mr. Utley:

The purpose of this letter is to forward the recommendations identified during INPO's Emergency Preparedness Review and Assistance visit to the Brunswick Steam Electric Plant (BSEP) during the week of May 10, 1982. These recommendations are a refined version of the material presented and discussed at the exit meeting on May 14, 1982.

During the review, the team identified several good points in your emergency preparedness program that deserve mentioning, including the following:

- In the area of the Emergency Plan, the plan itself is concise, readable and well organized. Therefore, it provides a good basis for the emergency preparedness training program.

- In the area of Emergency Response Training, the quarterly drills being conducted are a definite benefit to the training effort.

- In the area of Emergency Facilities, Equipment, and Resources, we noted the excellent personnel resources in health physics, environmental monitoring, and technical support. In addition, the Harris Energy and Environmental Center provides an excellent resource of technical analysis in environmental sampling and chemical analysis for extended emergencies.

- In the area of Emergency Assessment and Notification, we noted the cooperative effort between Carolina Power & Light, Duke Power Company, and South Carolina Electric and Gas in standardizing dose assessment and notification procedures with the states of North Carolina and South Carolina. This effort could become a model for other regional utility/state groups to emulate.

- In the area of Emergency Public Information, we noted the following good points:

  - utilizing the government affairs coordinator as both a formal communications liaison with state media officials and as an informal communications facilitator with other state officials involved in technical areas of emergency response

  - hard-copying news releases to neighboring nuclear utilities

  - providing speaker phones between the near-site media center and the civic center in Raleigh, where additional media could gather and participate in news briefings being conducted in Brunswick

In conducting a review in the limited time available, we were not able to look at every aspect of the emergency preparedness program. During this visit, your commitments to the outage prevented us from reviewing initial dose assessment and the new post-accident sampling system. The following recommendations should, therefore, be viewed as potential indicators of other related problems that did not come to light during the review. A response to the recommendations is not requested by INPO; however, INPO suggests that Carolina Power & Light develop internal plans to deal with each recommendation as considered appropriate.

The following recommendations for improvements are correlated to the attached Emergency Preparedness Performance Criteria and Objectives developed by INPO.

Emergency Operating Organization

The criteria for this performance objective have been met.

Emergency Plan

- o Inconsistencies exist between the BSEP Emergency Plan Implementing Procedures and within the procedures themselves. The emergency plan, implementing procedures and routine procedures should be reviewed and correlated to improve coordination of all the procedures.

- o Letters of agreement with off-site organizations need to be reviewed and updated. Some of the agreements should be removed (those covered by offsite emergency plans); the remainder should be updated.

- o The BSEP Emergency Plan does not have a mechanism to indicate management approval. An approval sheet or other instrument should indicate upper management approval of the emergency plan.

Emergency Response Training

- o No central tracking program exists for emergency response training. A tracking program should be developed that includes the following:
  - who should be trained and by whom
  - procedures on which personnel need to be trained
  - frequency for training and retraining
  - training documentation
  - proficiency requirements for training

- o The quarterly table-top drills are not documented properly as part of the emergency response training program. These drills are also not critiqued formally. Drills should be documented as part of the tracking program noted above. Critiques should be conducted similar to those held for BSEP exercises.

Emergency Facilities, Equipment, and Resources

- o The emergency environmental monitoring teams do not have a dedicated frequency for field radio communications. A separate frequency should be assigned, which would ensure improved communications for these teams.

Emergency Assessment and Notification

- The BSEP high volume air samplers cannot obtain a representative I-131 sample nor achieve the sensitivity stated in the emergency plan. These samplers should be replaced with equipment capable of producing representative samples and adequate sensitivity.

- The BSEP Emergency Plan does not define the physical limits for the site boundary. The site boundary should be properly defined since it is the basis of reference for offsite dose assessment.

- The Harris Energy and Environmental Center does not have a twenty-four hour point of contact for notifications. A point of contact should be established to provide prompt activation of this emergency response group.

Emergency Personnel Protection

The criteria for this performance objective have been met.

Emergency Public Information

- A liaison for the corporate spokesman between the Emergency Operations Facility/Technical Support Center and the Near-site Media Center has not been formally designated. This function has been exercised during drills and should be formally assigned in the emergency plan and implementing procedure.

- Procedures in some areas of emergency public information are lacking necessary detail or need clarification. An inventory of equipment and supplies for the near-site media center should be provided in these procedures. A statement describing the transfer of authority between the corporate headquarters to the near-site media center should also be provided.

- Adequate provisions for rumor control have not been made. An expanded rumor response function should be provided to address the following areas:

  - identify and assign additional people to staff rumor control phones

  - specify provisions to make rumor control numbers available to the public in an emergency

- include the rumor control function in emergency drills

- conduct training for rumor control specialists, and provide them with adequate resources.

o Provisions have not been made to monitor broadcasts by media in the vicinity of the Brunswick station. This responsibility should be assigned to an appropriate group to monitor reports by media in the Wilmington/Brunswick area and to report any inaccuracies to the public information coordinator.

o The Near-site Media Center is inadequate for coping with media groups for plant incidents that would generate national attention. Establishment of an adequate near-site center should be considered. In the interim, the existing informal agreement with the backup facility in Wilmington should be made formal to ensure availability of facilities for use in media briefings during an emergency.

We welcome any suggestions for improving the emphasis of our Review and Assistance visits. Any questions regarding this report or the visit may be directed to me or Travis Beard, the team manager, at (404) 953-3600.

Sincerely,

P. W. Lyon, Director
Radiological Protection
& Emergency Preparedness
Division

PWL:jky

Attachment

cc: S. H. Smith, Jr.
B. J. Furr
P. W. Howe
A. L. Morris
C. R. Dietz
R. G. Black, Jr.
E. P. Wilkinson

11. Security and Safeguards (NRC Category 2)

The report when assessing H. B. Robinson in this area cites the corporate management program's apparent security emphasis as an enhancement to the site security program. No mention of the corporate program is provided in the Brunswick section. The program is the same across all plants and is an enhancement to Brunswick as well as H. B. Robinson. Equal recognition should be given to Brunswick.

Carolina Power & Light Company concurs with the Board's assessment of Category 2.

12. Audits, Review and Committee Activities (NRC Category 3)

The violation on October 20 - 24 and October 27 - 31, 1980 cited concerning failure of the corporate nuclear safety unit to review a plant modification has been taken out of context. The modification in fact had been reviewed for Unit 1. The violation was for the exact same modification for Unit 2 and the nuclear safety unit had requested the plant to forward the "sister" modification for review prior to the citation. The report is silent on these points.

Additionally, the report fails to recognize the development of the On-Site Nuclear Safety function and its contribution to the quality of the review process as well as special investigative efforts. This is not an NRC requirement for operating plants; however, CP&L views this as a major improvement in this area. CP&L initiated this change on its own in the absence of NRC requirements. Other improvements in this area have been delayed due to NRC's failure to issue Administrative Technical Specifications for onsite organizations which were submitted a year ago.

Finally, the rating during this evaluation period in this area seems to be based on a very small sample set and the rating is inconsistent with the data. The basis for the statement that insufficient management attention has been placed in this area is unsubstantiated.

For these reasons, the Board's assessment appears to be too low and should be Category 2.

13. Administrative, QA and Records (NRC Category 3)

The NRC has given CP&L little credit for its responsiveness in addressing and closing a number of enforcement items that were identified during the inspection period. Although the enforcement items identified appear to be factually accurate, the context in which they are presented imply a more serious problem than actually existed. In fact, all of the identified NRC items but one, that are QA related, have been satisfactorily addressed and closed out for some time. This was recently verified by an NRC representative in a recent inspection.

CP&L concurs, however, with the Board's overall assessment of Category 3.

14. Corrective Actions and Reporting (NRC Category 2)

The Report fails to recognize that the large number of LERs is a direct result of the use of Standard Technical Specifications. Although our efforts are directed to improve the quality of all aspects of our operation, the large numbers in themselves are counter-productive to safety through unnecessary dilution of manpower resources. Brunswick and Hatch Unit No. 2 are the only operating BWRs under Standard Technical Specifications.

NRR's review and assessment of CP&L's responses to inquiries have conveyed recognition and acceptance of the technical content and comprehensiveness of CP&L's presentations.

During the period of the SALP evaluation, July 1, 1980, through December 31, 1981, CP&L and the NRC mutually recognized a need to augment the staffing levels of the Regulatory Compliance subunit at Brunswick. Three additional senior level positions were approved by CP&L management. Also, an experienced staff level Regulatory Engineer was temporarily reassigned from Corporate Licensing to Regulatory Compliance subunit at Brunswick. As a result of management attention and response,

noteworthy improvements have been made in the Brunswick Regulatory Compliance subunit's performance.

A computerized action item tracking system has been implemented and refined. Renewed emphasis in defining root causes of problems and a common effort in implementing corrective actions have greatly improved the quality of Brunswick Licensee Event Reports. Every attempt is being made to submit required reports in a concise, meaningful, accurate, and timely manner.

The SALP Report for Brunswick identified two past violations regarding corrective actions and reporting. These items have been previously closed out. There are no lingering contentions or unresolved questions concerning these violations. A Category 2 SALP appraisal of Brunswick corrective actions and reporting is fair and satisfactory.

Attachment 4

COMPARISON OF CP&L AND NRC
RATINGS OF AREAS

CP&L believes that a balanced assessment of plant performance using NRC SALP Program guidelines would yield the following rating:

Shearon Harris Plant

	Area	NRC Rating	CP&L Rating
1.	Quality Assurance	2	1
2.	Site Preparation and Foundation	2	1
3.	Containment Structure	2	2
4.	Safety-Related Structure	2	2
5.	Piping and Hangers	2	2
6.	Safety-Related Components	2	2
7.	Electrical Systems	2	2
8.	Instrumentation and Wire	2	2
9.	Fire Protection	2	1
10.	Preservice Inspection	NA	NA
11.	Corrective Actions and Reporting	2	1
12.	Procurement	2	2
13.	Design and Design Changes	2	2
14.	Training	2	2

H. B. Robinson

	Area	NRC Rating	CP&L Rating
1.	Operations	2	2
2.	Refueling Operations	2	1
3.	Maintenance	2	2
*4.	Surveillance	2	2
5.	Personnel, Training and Plant Procedures	3	2
6.	Fire Protection and Housekeeping	2	1
7.	Design Changes and Modifications	2	1
8.	Radiation Protection, Radioactive Waste Management and Transportation	3	2
9.	Environmental Monitoring	1	1
10.	Emergency Prepardness	2	2
11.	Security and Safeguards	2	2
12.	Audits, Review and Committee Action	2	1
13.	Administrative, QA and Records	2	2
14.	Corrective Actions and Reporting	2	1

*SALP Report lists Category 2 on Page 3, but Category 3 on Page 23.

Brunswick

	Area	NRC Rating	CP&L Rating
1.	Operations	3	3
2.	Refueling Operations	N/A	N/A
3.	Maintenance	3	2
4.	Surveillance	2	2
5.	Personnel, Training and Plant Procedures	3	3
6.	Fire Protection and Housekeeping	3	2
7.	Design Changes and Modifications	2	2
8.	Radiation Protection, Radioactive Waste Management and Transportation	3	2
9.	Environmental Monitoring	3	2
10.	Emergency Preparedness	2	1
11.	Security and Safeguards	2	2
12.	Audits, review and Committee Action	3	2
13.	Administrative, QA and Records	3	3
14.	Corrective Actions and Reporting	2	2

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

June 14, 1983

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

Gentlemen:

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

The Nuclear Regulatory Commission has completed its periodic evaluation of the performance of your reactor facilities. As you are aware, this evaluation program, the Systematic Assessment of Licensee Performance (SALP), involves an assessment of facility performance by the NRC staff; the issuance of the staff's findings in the form of a final report, the SALP Board Assessment (Enclosure 1); a meeting with your senior staff on May 10, 1983, to present and discuss the Board's assessment (Enclosure 2); your response to the SALP Board's assessment (Enclosures 3 and 4); and the approval and public distribution of the SALP Report by the Regional Administrator.

In accordance with NRC policy, I have reviewed the SALP Board Assessment and as Regional Administrator, approve the issuance of the NRC SALP Report.

Your response to the SALP Board's assessment discussed several areas in which you have undertaken major efforts to effect programmatic improvements. We support these efforts and wish to note that you have made noticeable improvement in safety-related performance at your facilities. We are confident that these on-going efforts, if properly implemented and maintained, will result in significant improvements.

The following discussions relate to my resolution of your comments and are considered to be an integral part of the NRC SALP Report:

1. The overall performance of your Brunswick facility was acceptable; however, resources appeared to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety was achieved. We acknowledge the measures which you are taking to correct identified weaknesses in the areas of plant operations, maintenance, surveillance, fire protection, refueling, licensing activities, and quality assurance programs. We believe that your actions if properly implemented, will bring about improved performance in these areas. The results of your actions will be closely monitored and reported in the next SALP assessment. It is noted that the SALP Board praised your performance in the areas of emergency preparedness, and security and safeguards.

As regards your performance in the areas of radiation protection and licensing, I have reviewed your comments and, after further review of the issues with NRC managers, have concluded that the SALP Board's assessment of performance in these areas represents an appropriate balance of the pertinent issues.

2. Management attention and appropriate involvement in various safety activities were evident at your Robinson facility. Your letters of May 20, 1983, and May 27, 1983, provided information which you felt supported SALP rating changes in the specific areas of maintenance, fire protection, licensing activities, and quality assurance programs. I have carefully reviewed this information, as well as the SALP Board Assessment, and have determined that your performance in the functional area of maintenance should be raised from Category 3 to Category 2. The SALP Board Assessment is hereby amended such that the functional area of maintenance for Robinson is now "Category 2." I have further determined that, in the licensing and quality assurance program functional areas, the SALP Board's rating appropriately characterized performance. The quality assurance program rating was a composite of the performance of the on-site and corporate QA elements. The deciding factor was poor corporate performance in the QA area. As regards the area of fire protection, our limited inspection activity indicated a high level of performance; however, due to the fact that inspections were not performed by regional based inspectors, sufficient information was not available to justify an overall rating. Major strengths were identified in the areas of surveillance and refueling. The weaknesses noted in your performance, in the areas of licensing and quality assurance program, will be closely monitored and reported in the next SALP assessment.

3. We evaluated the performance of construction activities at the Harris facility to be fully satisfactory. A weakness was identified by the SALP Board in the area of licensing activities. I have reviewed your comments as they pertain to this area with NRC managers as well as the soils and foundation functional area. I have determined that the SALP Board conclusions were correct. The SALP Board recognized, and I agree, that a high level of performance was achieved in the functional areas of containment and other safety-related structures, and support systems.

No reply to this letter is required; however, should you have any questions concerning these matters, I will be pleased to discuss them with you.

Sincerely,

James P. O'Reilly

James P. O'Reilly
Regional Administrator

Enclosures: (See Page 3)

Enclosures:
1. Letter from R. C. Lewis, NRC,
   to E. E. Utley, CPL,
   dated May 3, 1983
2. NRC/CPL SALP Meeting Attendees
3. Letter from E. E. Utley, CPL,
   to James P. O'Reilly, NRC,
   dated May 20, 1983
4. Letter from E. E. Utley, CPL,
   to James P. O'Reilly, NRC,
   dated May 27, 1983

cc w/encls:
C. R. Dietz, Plant Manager
R. B. Starkey, Jr., Plant General Manager
R. M. Parsons, Project General Manager

ENCLOSURE 2

NRC/CPL SALP Meeting Attendees

Licensee: Carolina Power and Light Company

Facilities: Brunswick Steam Electric Plant,
Robinson Steam Electric Plant, and
Harris Nuclear Power Plant

Meeting At: Carolina Power and Light
Company's Corporate Office,
Raleigh, North Carolina

Date Conducted: May 10, 1983

1. Licensee Attendees

S. H. Smith, Jr., Chairman/President
J. A. Jones, Vice-Chairman, Retired
E. E. Utley, Executive Vice President, Power Supply and Engineering and Construction
L. W. Eury, Senior Vice President, Power Supply
M. A. McDuffie, Senior Vice President, Engineering and Construction
J. M. Davis, Jr., Senior Vice President, Fuels and Materials Management
T. S. Ellemen, Vice President, Corporate Nuclear Safety and Research
A. B. Cutter, Vice President, Nuclear Plant Engineering
B. J. Furr, Vice President, Nuclear Operations
S. D. Smith, Vice President, Nuclear Plant Construction
P. W. Howe, Vice President, Brunswick Nuclear Project
H. R. Banks, Manager, Corporate QA
B. H. Webster, Manager, Environmental and Radiological Control
W. J. Hurford, Manager, Technical Services
S. R. Zimmerman, Manager, Licensing and Permits
C. R. Dietz, General Manager, Brunswick Nuclear Project
R. B. Starkey, Jr., General Manager, H. B. Robinson Nuclear Plant
J. L. Willis, General Manager, Harris Plant
R. M. Parsons, Site Manager, Harris Plant
L. I. Loflin, Manager of Engineering, Harris Plant

2. NRC Attendees

James P. O'Reilly, Regional Administrator, RII
R. C. Lewis, Director, Division of Project and Resident Programs (DPRP), (SALP Board Chairman), RII
J. A. Olshinski, Director, Division of Engineering and Operational Programs, RII
D. B. Vassallo, Chief, Operating Reactors Branch 2, Division of Licensing (DL), NRR
G. W. Knighton, Chief, Licensing Branch 3, DL, NRR
D. M. Verrelli, Chief, Project Branch 1 (PB 1), DPRP, RII
M. V. Sinkule, Chief, Operational Support Section, Program Support Staff (PSS), RII
P. R. Bemis, Chief, Project Section 1C, PB 1, DPRP, RII
D. O. Myers, Senior Resident Inspector, DPRP, RII
S. Weise, Senior Resident Inspector, DPRP, RII
G. F. Maxwell, Senior Resident Inspector, DPRP, RII
R. L. Prevatte, Resident Inspector, DPRP, RII
G. Requa, Project Manager, Operating Reactors Branch 1, DL, NRR
S. D. Mackay, Project Manager, Operating Reactors Branch 2, DL, NRR
N. P. Kadambi, Project Manager, Licensing Branch 3, DL, NRR

SP&L

Carolina Power & Light Company

May 20, 1983 MAY 27 A10 : 0 SERIAL: LAP-83-195

Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, NW
Atlanta, GA 30303

RESPONSE TO
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) BOARD
ASSESSMENT OF BRUNSWICK, H. B. ROBINSON, AND SHEARON HARRIS PLANTS
REPORT NOS. 50-325/82-15, 50-324/82-15
50-261/820-17, 50-400/82-14, AND 50-401/82-14

Dear Mr. O'Reilly:

Mr. R. C. Lewis' letter of May 3, 1983 forwarded to Carolina Power & Light Company (CP&L) the results of the SALP Board findings for CP&L plants for the time period January 1, 1982 through January 31, 1983. The purpose of this letter is to provide CP&L's response to those findings.

Carolina Power & Light Company concurs with the objectives of the SALP Program. NRC has stated that the SALP review process should not only aid in improving licensee performance, but provide a basis for allocation of NRC inspection resources and improve the overall NRC inspection program. To accomplish these objectives, we understand that the NRC's SALP ratings have the following meanings:

Category 1

Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2

NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

8306290553

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

Category 3

Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

We appreciate NRC's response in this SALP Report to our comments on the 1982 SALP Board Report in which we requested more timely evaluation of our performance and recognition of corrective actions and improvements underway. We believe CP&L's nuclear program is achieving safe performance, and we feel that programs currently being implemented will result in substantial improvement in areas where weaknesses have been identified.

In response to the opportunity provided to comment on the current report, we have attached a detailed discussion of those areas which we believe should be rated higher. We have likewise described corrective and other actions currently underway to improve our performance. We encourage you to consider these comments in drafting the transmittal letter which formally issues the SALP Board Assessment as an NRC report.

Yours very truly,

E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

SRZ/lr (037SRZ)
Attachment

cc: NRC Resident Inspector (SHNPP)
NRC Resident Inspector (BSEP)
NRC Resident Inspector (HBR)

DETAILED COMMENTS CONCERNING
PERFORMANCE ANALYSIS FOR SHEARON HARRIS UNITS 1 & 2

1. Soils and Foundations (SALP Board Rating: Not Rated)

The SALP Board's comments on this area state: "There has not been sufficient licensee or NRC activity in this area to justify a rating." However, we believe the SALP Board's analysis section does provide sufficient justification for a rating and that rating should be Category 1.

NRC's criteria for rating an area are:

(1) Sufficient inspection activity must be conducted in that area during the review period.

(2) There must be sufficient licensee work activity in that area to allow valid evaluation.

We believe these criteria were met in this case as follows:

(1) The SALP Board's analysis section for this area states: "During this evaluation period six inspections were performed by regional based inspectors. Additionally, routine inspections were performed in this area by the resident inspector." . . . "No violations or deviations were identified."

(2) The Board also stated: "The inspections involved examination of QA implementing procedures, soils testing laboratory, records, and backfilling of the excavations for Units 3 and 4 which have been cancelled. The majority of the soils and foundation work had been completed for Units 1 and 2. The remaining activities in this area were primarily concerned with underground piping systems.

The QA/QC procedures and controls met NRC requirements. The records were generally complete, well maintained, and retrievable. Equipment in the testing laboratory was properly calibrated and testing and backfill operations were conducted in accordance with ASTM standards, procedures, and specification requirements."

While it is accurate to conclude that less total volume of earth was placed during the year, ditch and structural backfill was active all last year except when hampered by bad weather. The required control of these activities did not diminish significantly. As an indication of this level of activity, at least 904 soil density tests were performed to control backfill in the multitude of structural backfill tasks.

For the above reasons, we believe a Category 1 rating is justified.

2. Containment and Other Safety-Related Structures (SALP Board Rating: Category 1)

No comments.

3. Piping Systems and Supports (SALP Board Rating: Category 2)

No comments.

4. Safety-Related Components (SALP Board Rating: Category 2)

No comments.

5. Support Systems (SALP Board Rating: Category 1)

No comments.

6. Electrical Power Supply and Distribution (SALP Board Rating: Category 2)

No comments.

7. Instrumentation and Control Systems (SALP Board Rating: Not Rated)

No comments.

8. Licensing Activities (SALP Board Rating: Category 3)

As this is a new category which has not previously been rated in a CP&L SALP Report, it is difficult to establish a benchmark for a subjective rating of Licensing Activities. However, we believe the SALP Board's evaluation is not a balanced assessment. The Board chose to emphasize several isolated problem areas for review while ignoring the vast majority of CP&L's work efforts which we believe were thorough, timely, and responsive. An overall measure of CP&L's thoroughness in these areas was our performance in the major licensing work effort to respond to the FSAR and ER Acceptance Review and Safety Review Questions. Responses to 99 of the 116 Acceptance Review Questions were submitted on January 29, 1982 and June 30, 1982 and were incorporated into the FSAR and ER in Amendments 2 and 3. With respect to NRC Safety Review Questions, CP&L responded to 659 out of 705 safety review questions within the original NRC/CP&L schedule. During this period, CP&L produced and filed four FSAR and five ER amendments. Carolina Power & Light Company also responded to over 300 proposed intervenor contentions simultaneous with the above. These efforts resulted in closing many key review areas such as QA and Preoperational Testing and severely limited the number of contentions which were admitted to the proceedings. As a result of what we feel were thorough CP&L responses, NRC was able to publish a Draft Safety Evaulation Report with a much more limited list of open items. Also, as a measure of CP&L's thoroughness in responding to NRC's environmental questions, NRC recently was able to publish a SHNPP Draft Environmental Statement with no open environmental issues, to our knowledge. These efforts appear to have been ignored in the appraisal.

Specifically, the SALP Board's "Analysis" section cites the following licensing activities as its basis for their evaluation:

Reactor Systems Review of the FSAR
Instrumentation and Controls Review
Mechanical Engineering Review
Radwaste Systems Review
Reservoir Reanalysis Subsequent to Cancellation of Unit 3 and 4
Environmental Engineering

With respect to Reactor Systems review, NRC sent to CP&L 109 safety review questions. The Company submitted timely responses to 101. The NRC then requested clarification on 27; CP&L has responded to 17. This is a measure of CP&L's thoroughness, since the majority of issues were closed in a timely manner to NRR's satisfaction. Many of the remaining unresolved items are NRC issues generic to Westinghouse plants and are not due to CP&L unresponsiveness.

With respect to Instrumentation & Control review, NRC sent 56 safety review questions on July 30, 1982. CP&L responses were provided in two meetings (August 16-19, 1982 and September 14-16, 1982). These actions were technically responsive, thorough, and timely.

With respect to Mechanical Engineering Review, NRC conducted a site visit on November 2, 1982. The NRC then sent 45 safety review questions on December 22, 1982. Responses were presented in a February 1-3, 1983 meeting and all but seven were resolved. We believe this is a measure of CP&L's thorough and timely resolution of these issues. The remaining questions are being pursued vigorously.

In assessing the Radwaste Systems Review, NRR failed to conduct a timely review in this area in accordance with NRR's schedule, and questions were not submitted to CP&L until just before the DSER and DES inputs were due. CP&L mobilized the necessary resources to respond, conducted extensive reanalyses and responded as quickly as possible. Had these questions been raised by NRR consistent with the original agreed upon milestones, no impact on the schedule would have occurred.

In reviewing the Reservoir Reanalysis and its impact on the Environmental Engineering review, it should be noted that CP&L cancelled Units 3 and 4 at the same time the FSAR was docketed. The cancellation of these units presented unique problems in several areas, but came to light most vividly with respect to the Reservoir Reanalysis. In retrospect, the issue could have been handled better by both parties. CP&L, however, did devote a great deal of management attention and resources to this problem and was able to produce a reanalysis in as short a time as practicable. CP&L will use the lessons learned from this experience in future resolutions to NRR concerns.

Finally in reviewing CP&L's performance in the licensing area, it should be noted that the NRC changed its Project Managers for the Harris Project four times during this SALP review period, was 30 days late in issuing its first set of FSAR questions, 5 months late in issuing its last set of FSAR questions, 3 months late in issuing the Draft Safety Evaluation Report, and 6 months late in issuing the Draft Environmental Statement. Despite these schedule slippages, CP&L's licensing activities are basically on schedule. The report fails to recognize this performance by CP&L.

In summary, additional CP&L staffing and management attention will be devoted to Harris Plant licensing activities, and CP&L will take additional steps to upgrade performance in this area. Nevertheless, the current SALP Board rating of Category 3 is not justified either by the areas reviewed in the report or by reviewing the full scope of Harris Plant licensing activities, and the rating should be raised to Category 2.

9. Quality Assurance Program (SALP Board Rating: Category 2)

No Comment.

(SALP-A)

ATTACHMENT 2

DETAILED COMMENTS CONCERNING
PERFORMANCE ANALYSIS FOR H. B. ROBINSON UNIT 2

1. Plant Operations (SALP Board Rating: Category 2)

No comment.

2. Radiological Controls (SALP Board Rating: Category 2)

No comment.

3. Maintenance (SALP Board Rating: Category 3)

Given the many initiatives which were undertaken during the SALP evaluation period to improve plant identified and recognized concerns in the Maintenance area, CP&L believes that a Category 2 rating is justified. Specifically:

(1) Training (technical and management development training) of both craft persons and maintenance supervision/management, as appropriate, has been substantially increased.

(2) New administrative/management control systems have been developed and implemented. For example, historical trending of maintenance on major pieces of equipment, expanded vibration analyses techniques, and an automated system to improve the calibration control program have all been initiated.

(3) The Plant Maintenance Procedures are being rewritten. To date, 67 new or totally revised procedures have been developed, and approximately 64 additional revisions have been developed. This directly addresses the statement in the SALP report of "some weakness was noted in maintenance procedures adequacy."

(4) Housekeeping standards have been substantially improved which in turn has lead to improved work area and equipment control.

(5) Some maintenance facility changes for improved efficiency have been constructed; additional changes are planned.

(6) Maintenance management changes and technical human resources have been approved which are and will continue to improve our technical capabilities in solving maintenance-related problems and improve our overall management control and interface with other plant organizations.

It should be additionally noted that the "surveillance" and "Refueling" areas were rated Category I, and great portions of these efforts were executed directly or supported by the plant maintenance organization.

CP&L is confident that the initiatives undertaken above and the level of management involvement and attention evident in these actions will result in continuing enhancements in this area during future SALP evaluation periods.

With the recognition of the CP&L initiatives undertaken, the effective corrective actions implemented, and the level of management involvement and attention evident in the area during the evaluation period properly noted, CP&L concurs with the Board's overall rating of Category 3.

4. Surveillance (SALP Board Rating: Category 1)

No comment.

5. Fire Protection (SALP Board Rating: Not Rated)

CP&L believes that a Category 1 rating is justified for fire protection. Several outside organizations and persons (including NRC Inspectors) have made positive comments about the Robinson Plant Fire Protection Program and Organization.

During the evaluation period, Fire Protection Technical Aides were placed on each operating shift; weekly and daily housekeeping and Fire Protection inspections were performed by the Fire Protection Technical Aides; the training in the area of Fire Protection, both for Fire Protection personnel and plant personnel, in general, has been substantially increased; and generally, problems uncovered in the Fire Protection area have been found and identified by CP&L, with appropriate corrective action implemented in order to preclude recurrence. Therefore, there has been sufficient licensee activity to justify a rating.

Although, the SALP Report stated that "there was not sufficient inspection activity in this area (Fire Protection) during the evaluation period to justify a rating" the Report also states "no violations were identified." Since the SALP Board also stated, "the level of plant fire safety was greatly improved," and the previous SALP evaluation on Fire Protection was a Category 2, it would be appropriate for the Fire Protection area to have been rated a Category 1.

6. Emergency Preparedness (SALP Board Rating: Category 2)

No comment.

7. Security and Safeguards (SALP Board Rating: Category 2)

No comment.

8. Refueling (SALP Board Rating - Category 1)

No comment.

9. Licensing Activities (SALP Board Rating - Category 3)

"Licensing Activities" has not been used as a category for evaluation in previous CP&L SALP Reports, accordingly it is difficult to

establish a benchmark for a subjective rating of licensing activities. We do not, however, believe a Category 3 rating is justified.

The Company has recognized the need for improvements in this area and has taken several positive steps to achieve improved performance. These improvements include: 1) increasing the licensing staff and providing an onsite representative to work with the Plant Regulatory Compliance Unit; 2) increasing the Plant Regulatory Compliance Unit staffing; 3) improved upfront review of licensing and submittal schedules coupled with early feedback to the NRC on schedule achievability and; 4) development of a joint CP&L/NRC Licensing Open Items List with jointly agreed upon priorities.

CP&L believes that one of the keys to better performance in this area is communications. To that end, we have conducted two recent management meetings with NRR on licensing performance and intend to meet with NRR frequently in the future. Additionally, working level meetings will continue to be held to update the initial draft of the Licensing Open Items list. The NRR has enthusiastically supported these efforts. CP&L will also be visiting those utilities rated Category 1 in licensing activities and will incorporate appropriate lessons learned into CP&L's licensing program.

Of the specific licensing activities cited by the SALP Board Report, one area deserves comment. Pressurized Thermal Shock is listed as an extended issue. CP&L has devoted substantial resources to the resolution of this issue. The Company has met all of its commitments and submittal dates with respect to this extremely complicated matter and taken a leadership position in the industry in resolving this issue. Although we believe the potential safety issue of PTS has been resolved, we are continuing to work with NRC on a joint research project to further understand the problem. The report does not recognize any of these efforts.

The Company is developing a procedure to further enhance the thoroughness and verification of licensing information. We believe this will resolve the concern regarding technical adequacy of licensing submittals.

In summary, CP&L has recognized the need for additional improvements in this area is proceeding to implement steps to achieve improved performance. A Category 2 would be a more appropriate rating at this time.

10. Quality Assurance Program (SALP Board Rating: Category 3)

Paragraph 10, Board Comments, cites a "lack of management support of the Corporate Performance Evaluation Unit" as the reason for a Category 3 rating. However, during this SALP Report period, the Corporate Quality Assurance Department strengthened and improved the Performance Evaluation Unit. Additional Quality Assurance Specialists were added, and the frequency and scope of audits at the plants were increased. Increased attention was also given to obtaining corrective action to audit findings. The status of all open items from previous audits was reviewed during each audit and the status of these items is identified in each audit report. The escalation process was added to the audit procedure in which unresolved issues are escalated to the proper level of management involvement to be resolved. This process has resulted in increased management involvement in obtaining corrective action.

We believe these actions will resolve previous concerns in the QA program.

Although CP&L acknowledges a weakness in the Performance Evaluation Unit prior to corrective action being taken during the evaluation period, CP&L believes that the Category 3 rating does not accurately reflect the performance of the plant QA/QC Unit. In 1981, Quality Assurance within CP&L was reorganized into a Corporate department. Prior to reorganization, the plant QA Unit consisted of seven personnel. After reorganization, the plant QA/QC Unit increased to 16 personnel during 1982.

With the staff additions to the plant QA/QC Unit, the unit has been assigned increased scope and responsibility. In 1981, a total of 37 surveillances were performed. In 1982, a total of 53 surveillances were performed. Continuing the increase in surveillances in 1983, 50 surveillances have been performed to date with over 100 additional planned for the remainder of this year. This represents a significant increase in plant QA/QC Unit activities. In addition, the technical capability of the plant QA/QC Unit has been improved, including the addition of a Project QA Engineer.

Substantial improvement in the scope and depth of plant QA/QC Unit activities has been evident during the evaluation period. In 1981, this area was rated Category 2. CP&L believes the plant QA/QC Unit performance should be rated Category 2.

DETAILED COMMENTS CONCERNING
PERFORMANCE ANALYSIS FOR BRUNSWICK UNITS 1 AND 2

1. Plant Operations (SALP Board Rating: Category 3)

While we understand the SALP Board rating, many of CP&L's improvements, accomplished and underway, occurred near the end of the evaluation period and are not reflected in the report. These improvements are directed toward enhanced management involvement, improved procedures, and enhanced communications.

Management involvement in the operations of the Brunswick Plant have been significantly enhanced through several organizational changes. The most significant was the consolidation of all engineering, construction, and operations functions at the Brunswick Plant under a Vice President located at the Brunswick Plant site. Within the plant organization itself other significant organizational improvements have been implemented, which we believe will be effective in ensuring an adequate level of management involvement at all levels of the organization. Some of the more significant changes are:

1. The Director of Planning and Scheduling now reports to the Vice President - Brunswick Nuclear Project to provide more effective integration of site planning and scheduling activities.

2. The position of Manager - Technical and Administrative Services, reporting to the Plant General Manager has been created. Management of the Technical and Administrative Support functions will be consolidated under this position to relieve the Plant General Manager of direct management of these organizations.

3. The Director - Regulatory Compliance now reports to the Plant General Manager and the Regulatory Compliance Unit has been increased from 6 to 11 members.

4. Additional positions have been added to the Operations organization to increase technical support and training support.

We believe that these changes and others made or planned will significantly enhance the level of management involvement in Plant Operations, promote greater thoroughness and depth of analysis directed at resolution of technical and operational issues, and provide increased attention to the monitoring, tracking, and closing of regulatory issues.

The operations procedures are being rewritten as part of the Brunswick Improvement Program, which will eliminate poorly stated or ill understood procedures. We anticipate that this effort will be completed by the end of 1983. Plant and corporate management are closely monitoring the progress of this effort.

With respect to communications, there has been a significant emphasis on the importance of communications at all levels in the

organizations. For operators, the most significant enhancement in communications was the establishment of monthly meetings with the operating shifts conducted by the Vice President - Brunswick Nuclear Project and the Plant General Manager. These management personnel meet on a monthly basis with the Operations staff and with the Shift Operating Supervisors. These meetings provide an excellent opportunity for free and open exchange of ideas, concerns, plans, problems, and needs of the operating personnel. We believe that these meetings have been effective in improving communication channels within the operating organization.

An important aspect of our improved communication efforts at BSEP has been increased emphasis on discipline of operations and adherence to procedures. This concern has been, and continues to be, emphasized in training sessions as well as during meetings such as those held with the operating staffs.

2. Radiation Protection, Radioactive Waste Management and Transportation
(SALP Board Rating: Category 2)

We are pleased to note that the SALP Board has recognized an improvement in this area from Category 3 last period, to a Category 2 during this period. We believe, however, that the progress made in the radiation protection, radioactive waste management and transportation areas has been more significant than indicated in the SALP Board Report, and that a Category 1 rating is justified.

The SALP Board recognizes that the volume of solid waste generated during 1982 has decreased as compared to previous years, however the report notes that the waste volume is still higher than that generated by other similar facilities in the region. Over the past two years, extensive efforts have been made to reduce the volume of solid waste, while supporting substantial outage activities. These efforts have been effective. For example, the number of cubic feet of waste shipped in 1981 was 34% below shipments in 1980. 1982 shipments reflected an additional 22% reduction from the 1981 levels. This is more than a 50% reduction in just two years.

During this period we have also continued our extensive program of maintenance and modification programs for achieving further improvements in the radwaste area by upgrading and replacing components and adding new equipment. These efforts will improve the operation of this facility and reduce inleakage into the radwaste system. As a measure of our success, inleakage into the radwaste system has been decreased from an average of 95 gallons per minute in 1981 to an average of 76 gallons per minute in 1982. During the first 5 months of 1983, this level was further reduced to an average of 55 gallons per minute.

The Brunswick Steam Electric Plant has also increased its Radiological and Chemistry Staff from 36 people in 1979 to 135 in 1983. As a result, the experience level of this Staff has increased, supplemented by improved training programs for Health Physics personnel and for all employees. In addition, radwaste management was upgraded early in 1981 by permanently assigning people to the radwaste system. These personnel have no other responsibilities.

As a result of the above efforts, violations in the Radwaste and Environmental areas have decreased from 23 during the previous SALP review period to only 4 resulting from eight regional inspections during the 1982 SALP review period. This demonstrates that a Category 1 rating is justified.

3. Maintenance (SALP Board Rating: Category 3)

In recognition of the need to improve the maintenance program at the Brunswick Plant, CP&L began a maintenance improvement initiative in late 1980. This initiative has continued since that time and we believe that the maintenance improvement efforts are proceeding in a manner that will resolve the concerns identified in the SALP Report.

In July of 1981, the plant maintenance organization was restructured to: 1) provide more specific area responsibility of the maintenance staff, 2) increase engineering, supervisory and crafts support, and 3) increase the foremen-to-crafts ratio. Following this restructuring and in order to facilitate the increase in staff and improve the expertise of maintenance craft personnel at Brunswick, over 30 mechanical maintenance craft personnel were transferred from our fossil plants to Brunswick.

In addition, Mr. Mendall Long, Vice President - Special Projects, was assigned to the Brunswick Plant in mid 1981 as an on-site maintenance and operations consultant to plant management. Mr. Long possesses over 30 years of CP&L experience in power plant operation, maintenance, and engineering and has been working at the plant site since his assignment there to provide advice and guidance to the maintenance and the operations organizations on effecting program improvements.

Additional resources for the maintenance organization were approved in early 1983. Significant additions were:

1. Three Training Specialist positions have been added to the maintenance technical staff. These personnel will be responsible for the development of the training programs and lesson plans, coordination of training, and development of materials needed to conduct classroom training sessions for maintenance personnel.

2. The number of engineering positions in the maintenance organization has been increased from two to ten, and we will fill these positions as soon as possible.

In addition to the staff increases, the Maintenance Management System was implemented at the Brunswick Plant in 1981. Since its implementation, progress on expansion of the program has continued to be emphasized and good progress is being made.

A significant expansion of the Preventative Maintenance Program was initiated in early 1982. This expansion effort continued on a priority basis during 1982 and the near term objectives of the expansion of this program are scheduled to be completed by the end of 1983. Additional long-term enhancements of the PM Program are also scheduled for completion during 1984 and 1985.

For the above reasons, CP&L is confident that the maintenance program at Brunswick Plant has improved significantly and will be further improved in the future.

4. Surveillance and In-Service Testing (SALP Board Rating: Category 3)

Carolina Power & Light Company recognizes the programmmatic breakdowns that contributed to the overall rating in this category. We do not believe, however, that the SALP Board's "Analysis" Section provides an accurate reflection of the management involvement and management commitment to ensuring that improvements in this area are achieved. The SALP Report references the fact that 38 separate instances of reportable technical specification noncompliances were identified in this area. It should be noted that the majority of these noncompliances were identified by CP&L as the result of an unprecedented self-evaluation of the plant's surveillance and inservice testing programs.

Carolina Power & Light Company has conducted a massive upgrade and expansion of the Brunwick Inservice inspection program over the past 12 months in the following areas:

1. Establishment of a visual test program;
2. Inspection of Class II welds;
3. Reverification and redesignation of ASME boundary;
4. Establishment of clearly defined post-maintenance testing;
5. Re-evaluation of all containment isolation valves and establishment of a master containment isolation valve table;
6. Total upgrade of the integrated leak rate/local leak rate testing program.

We believe that the scope of the review effort initiated by CP&L during the summer of 1982 is unparalled within the nuclear industry. We also believe that this program went well beyond the requirements of the NRC Confirmatory Action Letters of July 2, 1982, and July 20, 1982.

The SALP Report addresses a Commission Order requiring implementation of the Brunswick Improvement Program. We believe that the SALP Report as written is subject to misinterpretation in that it does not acknowledge that the Brunswick Improvement Program was voluntarily developed by CP&L and provided to the NRC prior to the receipt of the Commission Order. In essence, the Commission Order simply mandated actions that CP&L already had underway.

In summary, CP&L believes that actions underway will resolve the problems identified.

5. Fire Protection (SALP Board Rating: Category 3)

Carolina Power & Light Company recognizes that improvements are needed in this area and has implemented corrective actions as follows:

1. The fire protection subgroup's manpower for routine inspections have been augmented with experienced operators.

2. A formal training program for fire protection personnel has been developed and is now being implemented.
3. A total review of the Brunswick fire protection program was conducted by an outside group which endorsed the actions being taken and made additional recommendations which are currently being reviewed for appropriate implementation.
4. A change in plant procedures now requires a daily review of fire protection limiting conditions for operation.

Carolina Power & Light Company believes that implementation of the above corrective actions will resolve the Brunswick fire protection concerns.

6. Emergency Preparedness (SALP Board Rating: Category 1)
No Comment

7. Security and Safeguards (SALP Board Rating: Category 1)
No Comment

8. Refueling (SALP Board Rating: Category 3)

The SALP Board cited poorly stated and ill understood procedures and lack of adequate management involvement in refueling operations. Carolina Power & Light Company has initiated corrective actions to address these concerns.

The fuel handling procedures have been rewritten and the general operating procedures have been the subject of an intense review. Changes made to the fuel handling procedures will prevent change of reactor mode without careful consideration of prerequisites necessary to enter a new mode.

Also, management control has been increased to ensure that fuel is not moved when any control rod is withdrawn from the core. Additional changes to the procedure provides further control as follows:

1. Verification of control rods prior to loading fuel into the cell is required.
2. Fuel movement sheets must have the concurrence of the SRO.
3. All procedures have been updated to prohibit fuel movement with any control rods withdrawn.
4. Instructions have been added to the procedure on how to prepare fuel movement sheets and ensure that technical specification requirements and independent verification requirements are considered in the refueling report.

CP&L believes these corrective actions will resolve the concerns noted.

9. Licensing Activities (SALP Board Rating: Category 3)

Paragraph 9.a. "Analysis" includes the statement, "No improvement was noted in this area since the last SALP evaluation." However, "Licensing Activities" was not a category in previous SALP Reports, and there was no NRR

management comment or communication with CP&L regarding NRR's observations in this area during the 1982 SALP review period.

CP&L has recognized the need for improvement in this area and has taken several positive steps to bring about that improvement. These steps include: 1) increasing the licensing staff in the General Office; 2) increasing the staffing of the plant Regulatory Compliance Unit from 6 to 11 positions; 3) changing the reporting responsibilities of the Director, Regulatory Compliance such that he reports directly to the Plant General Manager and; 4) working toward the development of an integrated 5-year plan with respect to regulatory requirements.

We are confident that these steps will produce positive results and an improved level of performance in the areas of responsiveness, thoroughness, and technical soundness of our submittals to NRR.

CP&L has recognized the need for additional communication with NRR, and intends to conduct frequent meetings both on the working and management level to discuss licensing open items and the current level of performance. CP&L has been working with NRR to develop a NRC/CP&L Licensing Open Items List which will include jointly agreed upon priorities and response dates. Two management meetings between CP&L and NRC already occurred concerning this concept and working level meetings are scheduled in the near future.

Specifically, in its analysis of licensing activities, the SALP Board cites the following eight areas as its basis for its evaluation:

Project Management Administration
NUREG-0737 Items
Appendix R
Environmental Qualification (EQ)
RPS Power Supply
Operator Licensing
Spent Fuel Storage Increase
Radiological Effluent Technical Specifications (RETS)

In reviewing these areas, CP&L feels that it was very responsive with respect to RETS, Spent Fuel Storage Increase, RPS Power Supply, and Environmental Qualification. The RETS submittal in particular has been highly praised within NRC, and CP&L has met its commitment in the areas of Spent Fuel, RPS Power Supply and EQ.

With regard to NUREG-0737 items, CP&L has, for selected items, found it necessary to delay implementation due to priority changes, design problems and construction difficulties. The Company also believes that the experience of the industry with NUREG-0737 items is similar to that of CP&L's experience.

In reviewing CP&L's response to Appendix R, in retrospect the issue could have been handled better by both CP&L and NRC. Brunswick presented a unique case in that it had a completely approved Safety Evaluation Report (SER) for Fire Protection, portions of which were invalidated by the issuance of Appendix R. In light of this reversal of NRC policy, CP&L's initial efforts were to assess in which areas the previous SER was now invalid and what legal and licensing actions were appropriate. Some delays in initially

responding to the new rule were anticipated when considering the resources and time previously devoted to satisfying the approved SER.

With respect to Project Management Administration, CP&L recognizes that timeliness and thoroughness have occasionally been problems with respect to licensing issues. We also believe, however, that the report fails to recognize the extraordinary demand placed on the licensing and plant staff during the extensive self-analysis performed by CP&L during the summer of 1982, which resulted in heavy licensing activities during the remainder of 1982. Considering the number of audits, the level of outage work and the several hundred pre-startup items which were processed during that period, we believe that this area was handled satisfactorily.

Based on the above, the rating of Category 3 seems inappropriate, and CP&L believes this rating should be changed to Category 2.

10. Quality Assurance Program (NRC rating: Category 3)

Paragraph 10, Board Comments, cites "failure to identify deficiencies in operational programs and failure to take effective corrective action" as the reason for a Category 3 rating. However, during this SALP report period, the Corporate Quality Assurance Department strengthened and improved the Performance Evaluation Unit. Additional Quality Assurance Specialists were added, and the frequency and scope of audits at the plants were increased. Increased attention was also given to obtaining corrective action to audit findings. The status of all open items from previous audits was reviewed during each audit and the status of these items is identified in each audit report. The escalation process was added to the audit procedure and this has resulted in increased management involvement in obtaining corrective action.

Also, the BSEP Operations QA staff technical capability was increased by the addition of QA Engineers as recommended by the QA program assessment that was performed by an outside consultant.

In summary, CP&L believes that corrective actions have been implemented to improve performance in this area.

(SALP-C)

Carolina Power & Light Company

83 JUN 1 P11 : 16

May 27, 1983 SERIAL: LAP-83-215

Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, NW
Atlanta, GA 30303

RESPONSE TO
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) BOARD
ASSESSMENT OF BRUNSWICK, H. B. ROBINSON, AND SHEARON HARRIS PLANTS
REPORT NOS. 50-325/83-09, 50-324/83-09
50-261/83-07, 50-400/83-10, AND 50-401/83-10

Dear Mr. O'Reilly:

Please find attached a replacement page for page 2 of Attachment 2 to Carolina Power & Light Company's letter of May 20, 1983 (Serial: LAP-83-195), which provided comments on the SALP Board assessment of the Brunswick, H. B. Robinson, and Shearon Harris Plants. This replacement page corrects a typographical error which appeared in the section entitled "Maintenance." Please replace the original page with the attached revision. This change was discussed with Mr. P. R. Bemis of your staff on May 27, 1983.

Should you have any questions on this matter, please do not hesitate to call.

Yours very truly,

L. W. Eury
Senior Vice President
Power Supply

JJS/mf (037SRZa)
Attachment

cc: NRC Resident Inspector (SHNPP)
NRC Resident Inspector (BSEP)
NRC Resident Inspector (HBR)

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

CP&L is confident that the initiatives undertaken above and the level of management involvement and attention evident in these actions will result in continuing enhancements in this area during future SALP evaluation periods.

With the recognition of the CP&L initiatives undertaken, the effective corrective actions implemented, and the level of management involvement and attention evident in the area during the evaluation period properly noted, CP&L believes a Category 2 rating is appropriate.

4. Surveillance (SALP Board Rating: Category 1)

No comment.

5. Fire Protection (SALP Board Rating: Not Rated)

CP&L believes that a Category 1 rating is justified for fire protection. Several outside organizations and persons (including NRC Inspectors) have made positive comments about the Robinson Plant Fire Protection Program and Organization.

During the evaluation period, Fire Protection Technical Aides were placed on each operating shift; weekly and daily housekeeping and Fire Protection inspections were performed by the Fire Protection Technical Aides; the training in the area of Fire Protection, both for Fire Protection personnel and plant personnel, in general, has been substantially increased; and generally, problems uncovered in the Fire Protection area have been found and identified by CP&L, with appropriate corrective action implemented in order to preclude recurrence. Therefore, there has been sufficient licensee activity to justify a rating.

Although, the SALP Report stated that "there was not sufficient inspection activity in this area (Fire Protection) during the evaluation period to justify a rating" the Report also states "no violations were identified." Since the SALP Board also stated, "the level of plant fire safety was greatly improved," and the previous SALP evaluation on Fire Protection was a Category 2, it would be appropriate for the Fire Protection area to have been rated a Category 1.

6. Emergency Preparedness (SALP Board Rating: Category 2)

No comment.

7. Security and Safeguards (SALP Board Rating: Category 2)

No comment.

8. Refueling (SALP Board Rating - Category 1)

No comment.

9. Licensing Activities (SALP Board Rating - Category 3)

"Licensing Activities" has not been used as a category for evaluation in previous CP&L SALP Reports, accordingly it is difficult to

Release

Issued SALP's
Background
Info for
SALP's that have
(C.) been issued.

~~Copy and~~
~~Return~~

SYSTEMATIC ASSESSMENT

OF

LICENSEE PERFORMANCE

(SALP)

JULY 1980 - DECEMBER 1981

CAROLINA POWER AND LIGHT COMPANY

MAY 28, 1982

INTRODUCTION

SALP PROGRAM OBJECTIVES

1. IMPROVE LICENSEE PERFORMANCE

2. PROVIDE A BASIS FOR ALLOCATION OF NRC RESOURCES

3. IMPROVE NRC REGULATORY PROGRAM

PERFORMANCE ANALYSIS AREAS FOR OPERATING REACTORS

1. PLANT OPERATIONS
2. REFUELING OPERATIONS
3. MAINTENANCE
4. SURVEILLANCE AND INSERVICE TESTING
5. PERSONNEL, TRAINING AND PLANT PROCEDURE
6. FIRE PROTECTION AND HOUSEKEEPING
7. DESIGN CHANGES AND MODIFICATIONS
8. RADIATION PROTECTION, RADIOACTIVE WASTE MANAGEMENT AND TRANSPORTATION
9. ENVIRONMENTAL PROTECTION
10. EMERGENCY PREPAREDNESS
11. SECURITY AND SAFEGUARDS
12. AUDITS, REVIEW AND COMMITTEE ACTIVITIES
13. ADMINISTRATIVE, QA AND RECORDS
14. CORRECTIVE ACTIONS AND REPORTING

PERFORMANCE ANALYSIS AREAS FOR CONSTRUCTION REACTORS

1. QUALITY ASSURANCE
2. SITE PREPARATION AND FOUNDATION
3. CONTAINMENT
4. SAFETY-RELATED STRUCTURES
5. PIPING AND HANGERS -- REACTOR COOLANT AND OTHER -- (INCLUDING WELDING AND NDE)
6. SAFETY-RELATED COMPONENTS (VESSEL, INTERNALS, PUMPS AND HVAC)
7. ELECTRICAL (EQUIPMENT, TRAY, WIRE)
8. INSTRUMENTATION AND WIRE
9. FIRE PROTECTION
10. PRESERVICE INSPECTION
11. CORRECTIVE ACTIONS AND REPORTING
12. PROCUREMENT (INCLUDING RECEIPT AND STORAGE)
13. DESIGN AND DESIGN CHANGES
14. TRAINING

PERFORMANCE ANALYSIS AREAS FOR CONSTRUCTION REACTORS WHICH ARE ALSO IN THE PREOPERATIONAL TEST PHASE

15. PLANT OPERATIONS PREPARATION
16. FUEL LOADING PREPARATION
17. MAINTENANCE
18. SECURITY AND SAFEGUARDS
19. SURVEILLANCE AND PREOPERATIONAL TESTING
20. EMERGENCY PLANNING
21. AUDITS, REVIEWS AND COMMITTEE ACTIVITIES

AREA PERFORMANCE

CATEGORY 1

REDUCED NRC ATTENTION MAY BE APPROPRIATE.

LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT ARE AGGRESSIVE AND ORIENTED TOWARD NUCLEAR SAFETY; LICENSEE RESOURCES ARE AMPLE AND EFFECTIVELY USED SUCH THAT A HIGH LEVEL OF PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

AREA PERFORMANCE

CATEGORY 2

NRC ATTENTION SHOULD BE MAINTAINED AT NORMAL LEVELS. LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT ARE EVIDENT AND ARE CONCERNED WITH NUCLEAR SAFETY; LICENSEE RESOURCES ARE ADEQUATE AND ARE REASONABLY EFFECTIVE SUCH THAT SATISFACTORY PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

AREA PERFORMANCE

CATEGORY 3

BOTH NRC AND LICENSEE ATTENTION SHOULD BE INCREASED. LICENSEE MANAGEMENT ATTENTION OR INVOLVEMENT IS ACCEPTABLE AND CONSIDERS NUCLEAR SAFETY, BUT WEAKNESSES ARE EVIDENT; LICENSEE RESOURCES APPEAR TO BE STRAINED OR NOT EFFECTIVELY USED SUCH THAT MINIMALLY SATISFACTORY PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

EVALUATION CRITERIA

1. MANAGEMENT INVOLVEMENT IN ASSURING QUALITY

2. APPROACH TO RESOLUTION OF TECHNICAL ISSUES FROM SAFETY STANDPOINT

3. RESPONSIVENESS TO NRC INITIATIVES

4. ENFORCEMENT HISTORY

5. REPORTING AND ANALYSIS OF REPORTABLE EVENTS

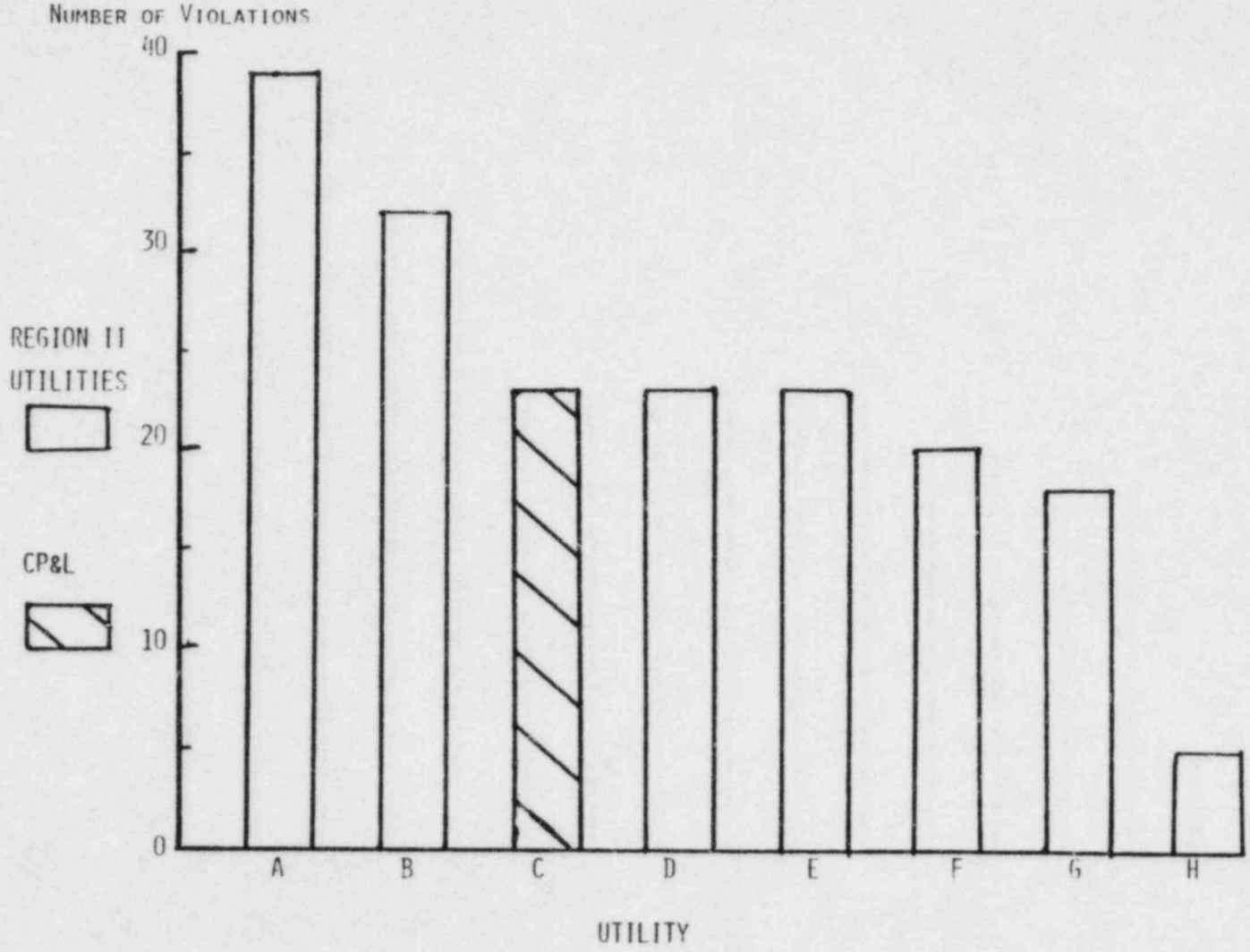
6. STAFFING (INCLUDING MANAGEMENT)

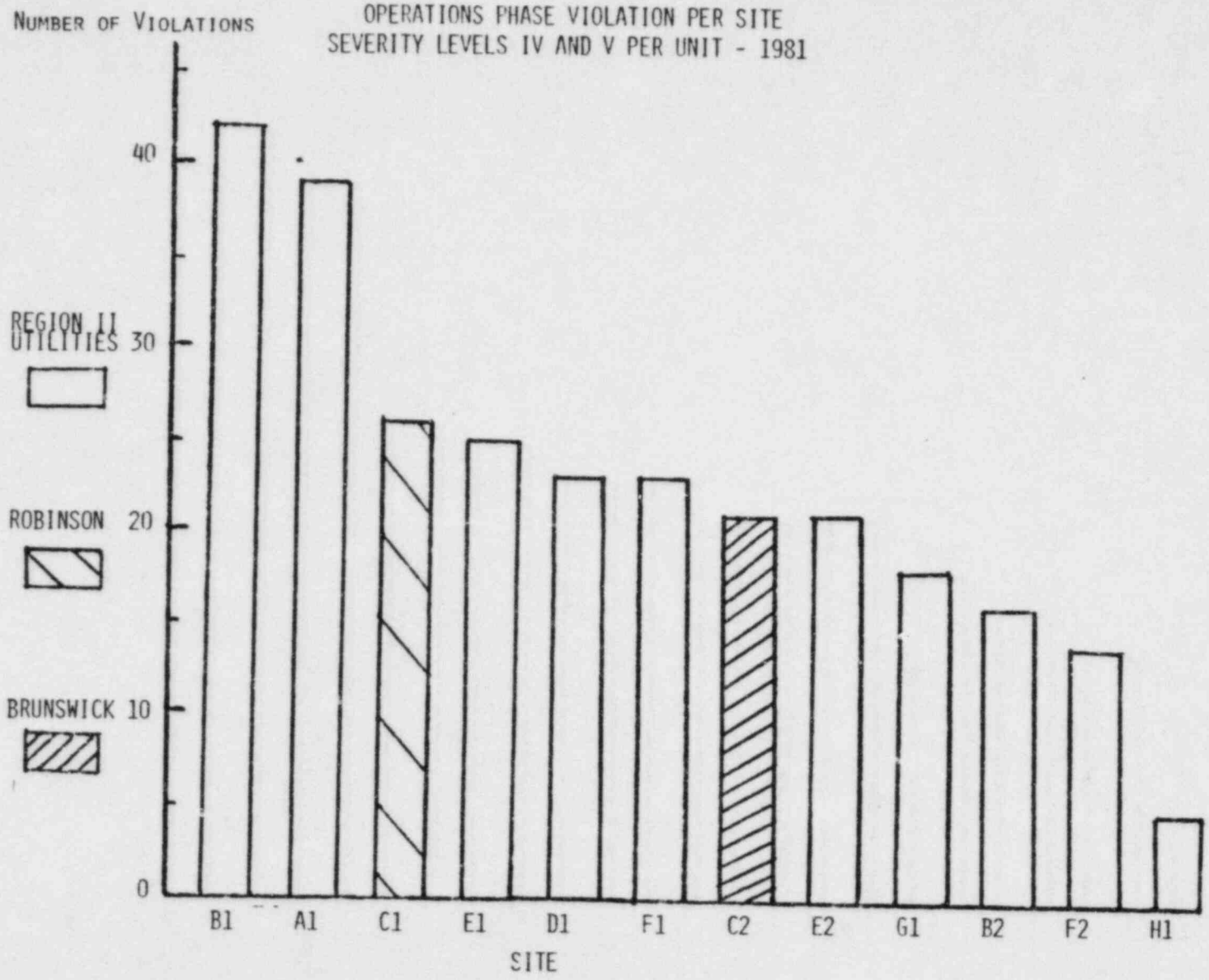
7. TRAINING EFFECTIVENESS AND QUALIFICATION

VIOLATIONS

OPERATIONS PHASE VIOLATIONS PER UTILITY

SEVERITY LEVELS IV AND V PER UNIT - 1931




NUMBER OF VIOLATIONS
OPERATIONS PHASE VIOLATION PER SITE
SEVERITY LEVELS IV AND V PER UNIT - 1981
REGION II UTILITIES
ROBINSON
BRUNSWICK
40
30
20
10
0
B1
A1
C1
E1
D1
F1
C2
E2
G1
B2
F2
H1
SITE

CAUSES OF REACTOR TRIPS
JANUARY 1981 - JUNE 1981

	TOTAL NUMBER OF TRIPS	AVERAGE TRIPS/UNIT	FEEDWATER/ CONDENSATE/ STEAM GENERATOR (REACTOR-RELATED) LEVEL	SURVEILLANCE/ MAINTENANCE RELATED	OTHERS
WESTINGHOUSE	135	5	43%	14%	43%
COMBUSTION ENGINEERING	23	3	39%	13%	48%
GENERAL ELECTRIC	70	3	19%	30%	51%
BABCOCK AND WILCOX	23	3	26%	26%	48%
BRUNSWICK	12	6	25%	8%	67%
ROBINSON	8	8	63%	13%	24%

UNITED STATES NUCLEAR REGULATORY COMMISSION

SYSTEMATIC ASSESSMENT

OF

LICENSEE PERFORMANCE

(SALP)

CAROLINA POWER AND LIGHT COMPANY

JANUARY 1982 - JANUARY 1983

BRUNSWICK STEAM ELECTRIC PLANT

ROBINSON STEAM ELECTRIC PLANT

HARRIS NUCLEAR POWER PLANT

MAY 10, 1983

RALEIGH, NORTH CAROLINA

INTRODUCTION

SALP PROGRAM OBJECTIVES

1. IMPROVE LICENSEE PERFORMANCE

2. PROVIDE A BASIS FOR ALLOCATION OF NRC RESOURCES

3. IMPROVE NRC REGULATORY PROGRAM

PERFORMANCE ANALYSIS AREAS FOR OPERATING REACTORS

1. PLANT OPERATIONS
2. RADIOLOGICAL CONTROLS
3. MAINTENANCE
4. SURVEILLANCE
5. FIRE PROTECTION
6. EMERGENCY PREPAREDNESS
7. SECURITY AND SAFEGUARDS
8. REFUELING
9. QUALITY ASSURANCE PROGRAM
10. LICENSING ACTIVITIES

PERFORMANCE ANALYSIS AREAS FOR CONSTRUCTION REACTORS

1. SOILS AND FOUNDATIONS
2. CONTAINMENT AND OTHER SAFETY RELATED STRUCTURES
3. PIPING SYSTEMS AND SUPPORTS
4. SAFETY RELATED COMPONENTS
5. SUPPORT SYSTEMS
6. ELECTRICAL POWER SUPPLY DISTRIBUTION
7. INSTRUMENTATION AND CONTROL
8. LICENSING ACTIVITIES
9. CONSTRUCTION QUALITY ASSURANCE PROGRAM

AREA PERFORMANCE

CATEGORY 1

REDUCED NRC ATTENTION MAY BE APPROPRIATE. LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT ARE AGGRESSIVE AND ORIENTED TOWARD NUCLEAR SAFETY; LICENSEE RESOURCES ARE AMPLE AND EFFECTIVELY USED SUCH THAT A HIGH LEVEL OF PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

AREA PERFORMANCE

CATEGORY 2

NRC ATTENTION SHOULD BE MAINTAINED AT NORMAL LEVELS. LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT ARE EVIDENT AND ARE CONCERNED WITH NUCLEAR SAFETY; LICENSEE RESOURCES ARE ADEQUATE AND ARE REASONABLY EFFECTIVE SUCH THAT SATISFACTORY PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

AREA PERFORMANCE

CATEGORY 3

BOTH NRC AND LICENSEE ATTENTION SHOULD BE INCREASED. LICENSEE MANAGEMENT ATTENTION OR INVOLVEMENT IS ACCEPTABLE AND CONSIDERS NUCLEAR SAFETY. BUT WEAKNESSES ARE EVIDENT: LICENSEE RESOURCES APPEAR TO BE STRAINED OR NOT EFFECTIVELY USED SUCH THAT MINIMALLY SATISFACTORY PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

EVALUATION CRITERIA

1. MANAGEMENT INVOLVEMENT IN ASSURING QUALITY

2. APPROACH TO RESOLUTION OF TECHNICAL ISSUES FROM THE SAFETY STANDPOINT

3. RESPONSIVENESS TO NRC INITIATIVES

4. ENFORCEMENT HISTORY

5. REPORTING AND ANALYSIS OF REPORTABLE EVENTS

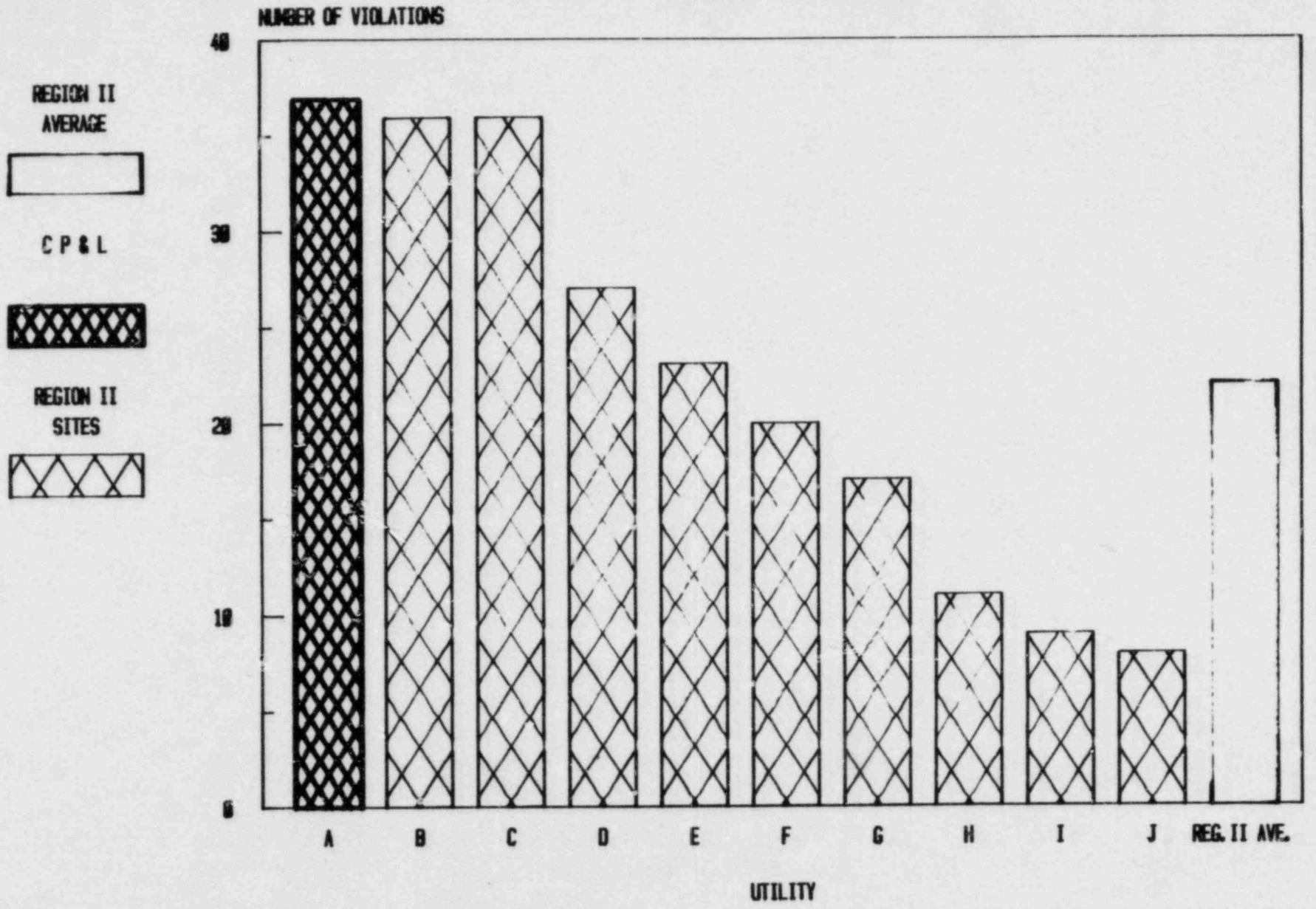
6. STAFFING (INCLUDING MANAGEMENT)

7. TRAINING EFFECTIVENESS AND QUALIFICATION

VIOLATIONS

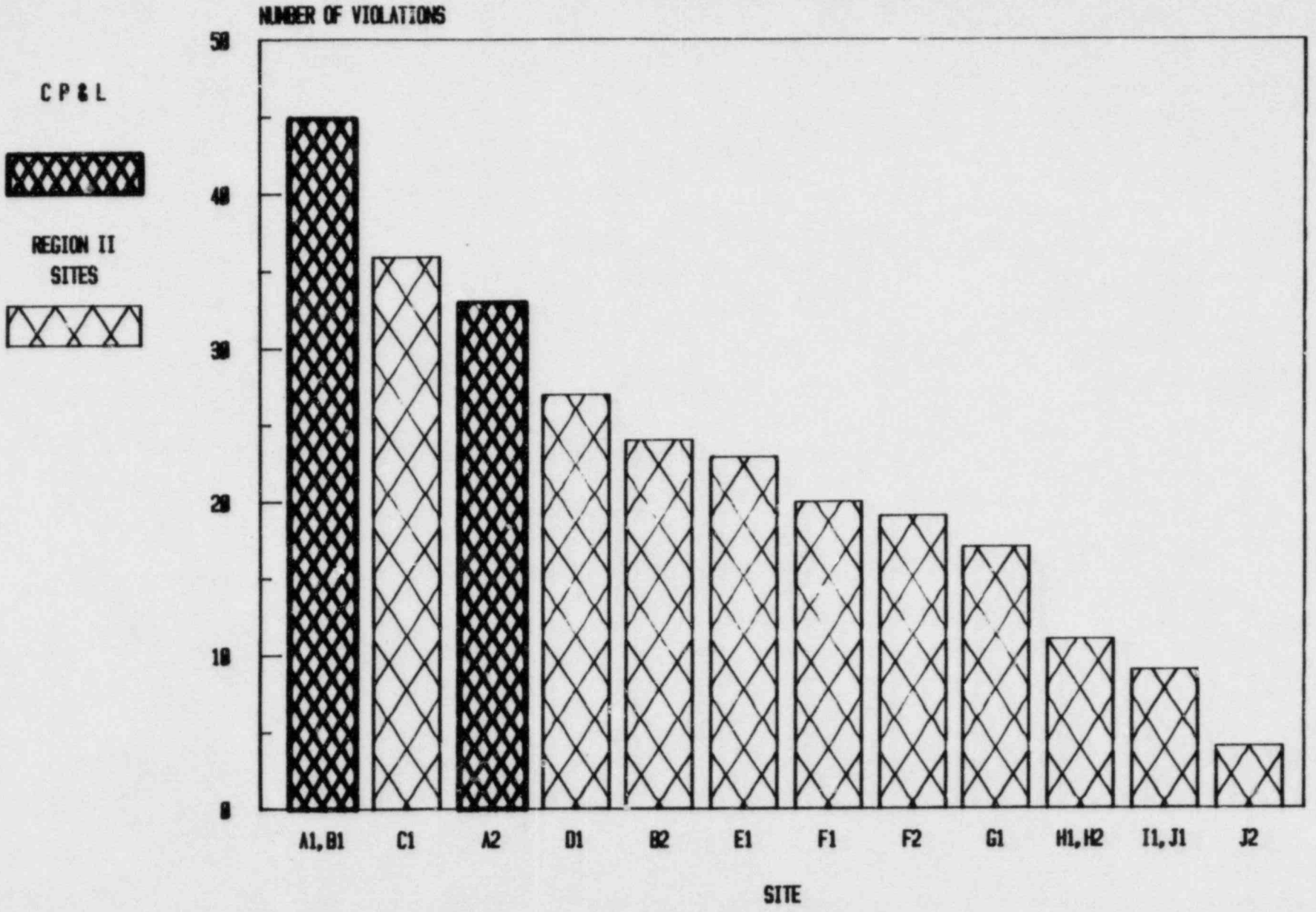
OPERATIONS PHASE VIOLATIONS/UTILITY/UNIT

JANUARY 1982 - JANUARY 1983



OPERATIONS PHASE VIOLATIONS/SITE/UNIT

JANUARY 1982 - JANUARY 1983



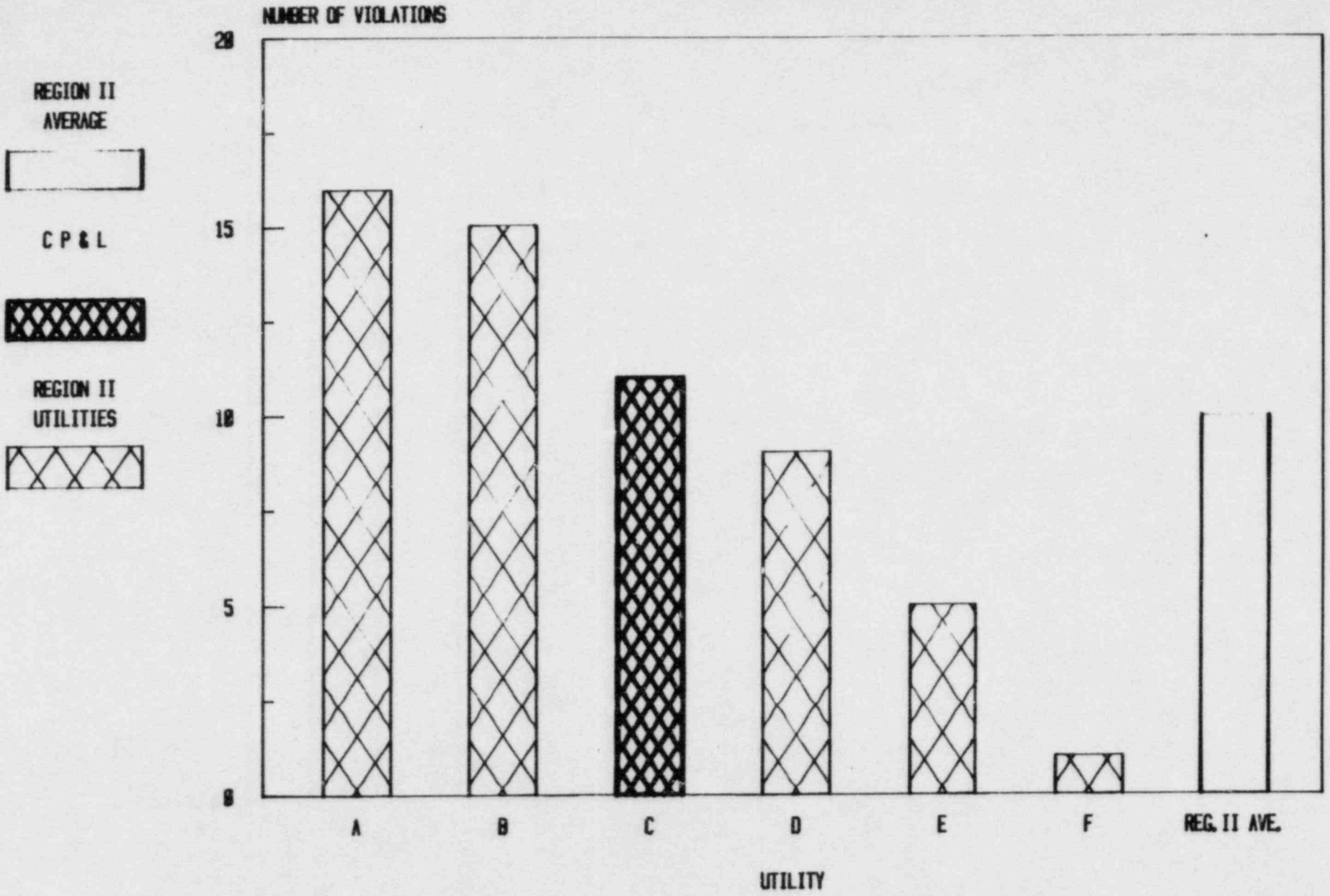
VIOLATION SUMMARY
OPERATING REACTORS

JANUARY 1982 - JANUARY 1983

	I	II	III	IV	V	VI	
BRUNSWICK 1	3	3	5	13	15	1	34
BRUNSWICK 2	3	3	2	14	18	3	32
ROBINSON 2	3	3	1	25	13	1	46
			8	52	50	2	112
REGION II AVERAGE	3	3	1	11	13	1	

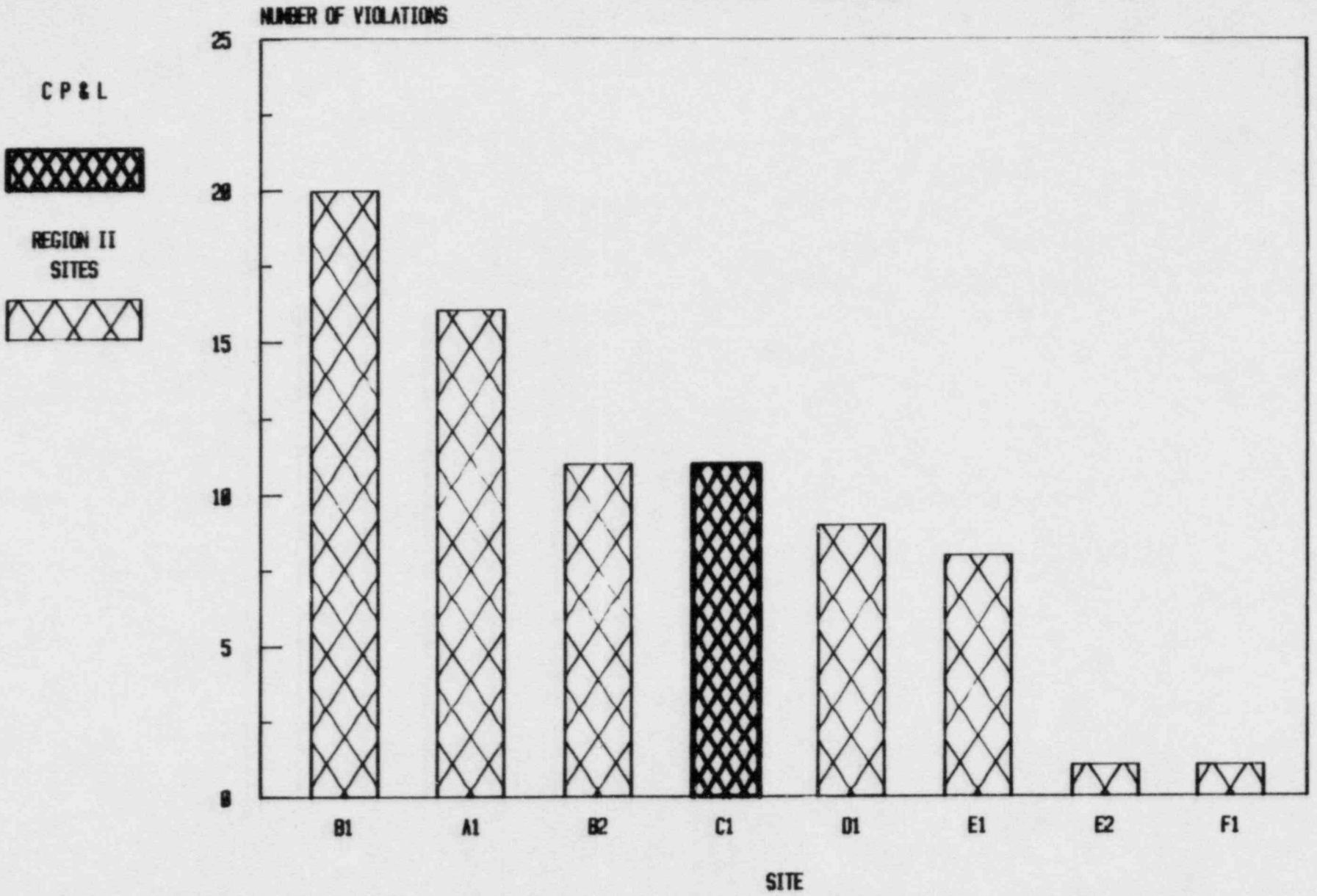
CONST. PHASE VIOLATIONS/UTILITY/UNIT

JANUARY 1982 - JANUARY 1983



CONST. PHASE VIOLATIONS/SITE/UNIT

JANUARY 1982 - JANUARY 1983



VIOLATION SUMMARY
CONSTRUCTION REACTORS

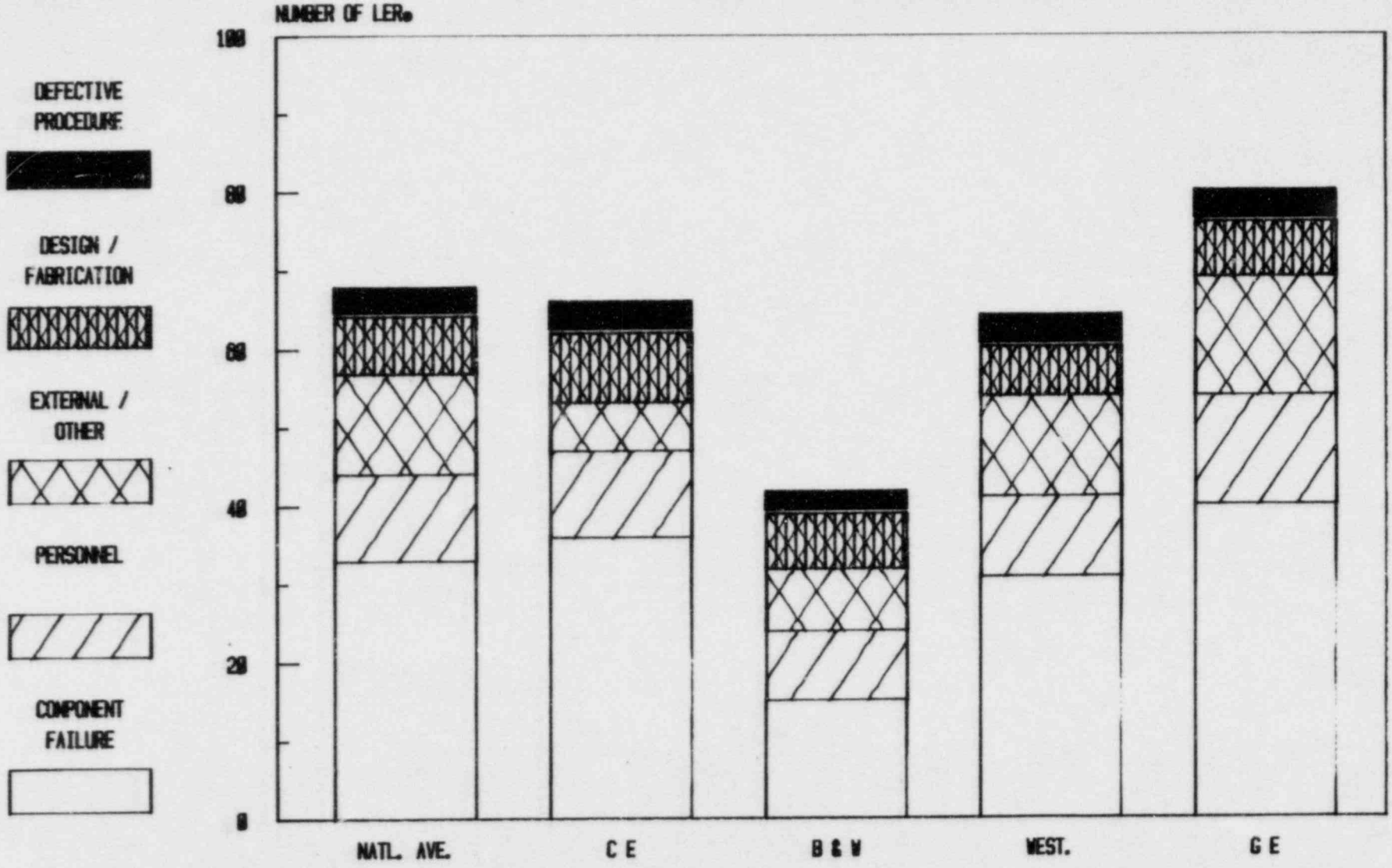
JANUARY 1982 - JANUARY 1983

	I	II	III	IV	V	VI	
HARRIS 1	0	0	0	3	13	1	20
HARRIS 2	0	0	0	1	2	0	4
				10	12	4	26
REGION II AVERAGE	0	0	0	5	5	0	

REPORTABLE EVENTS

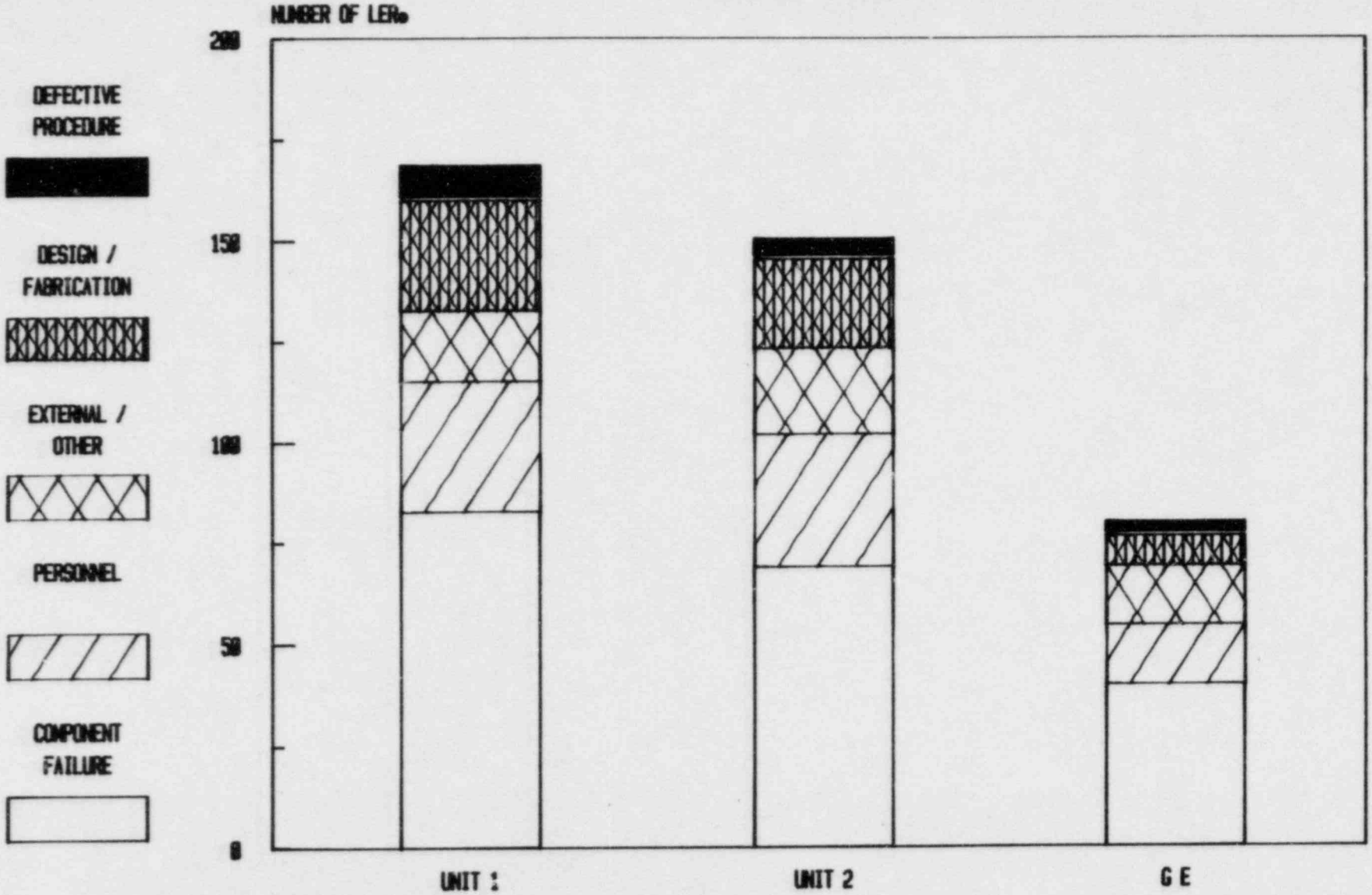
LERs PER PLANT TYPE

JANUARY 1982 - JANUARY 1983



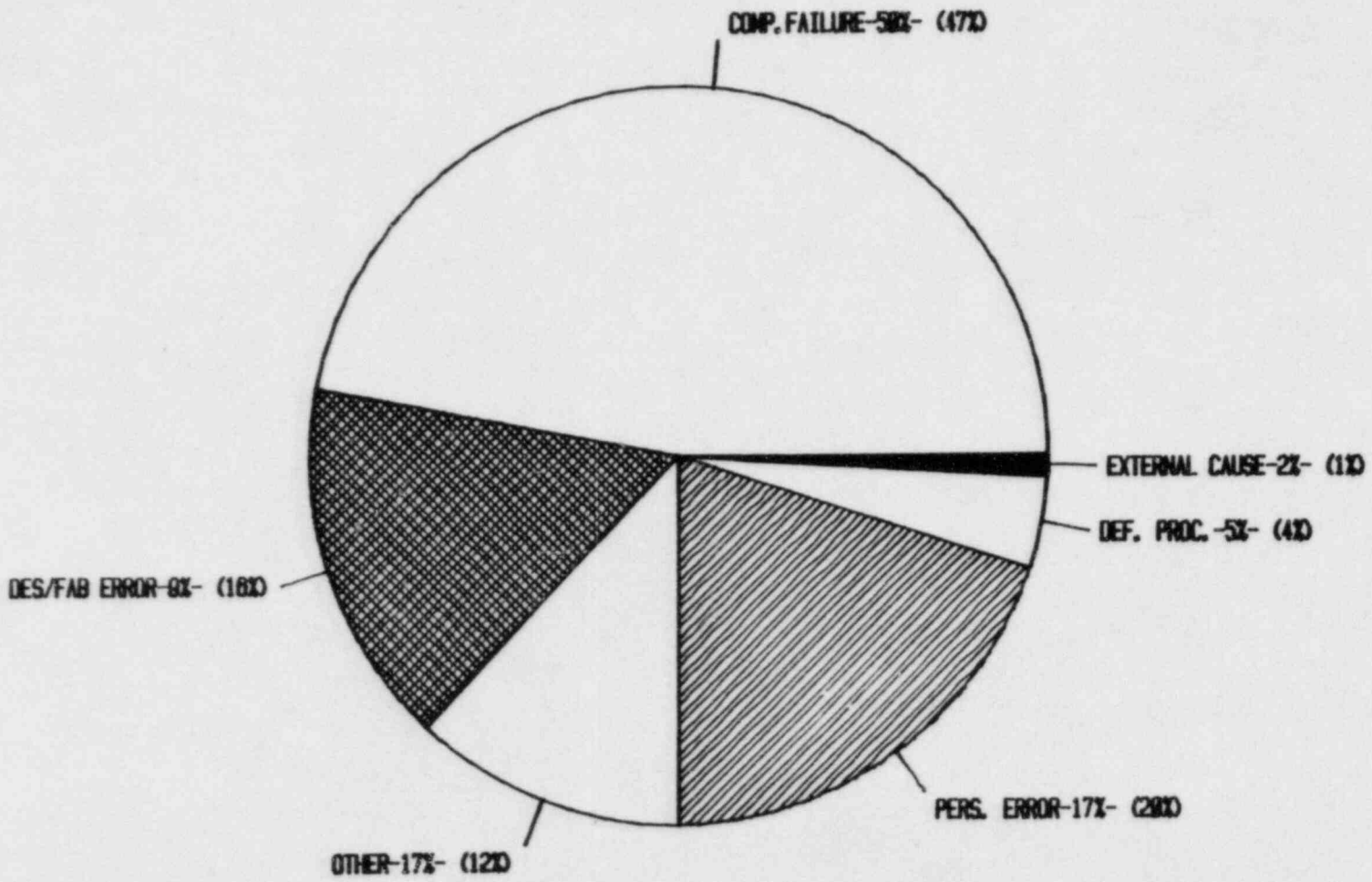
BRUNSWICK LERs

JANUARY 1982 - JANUARY 1983



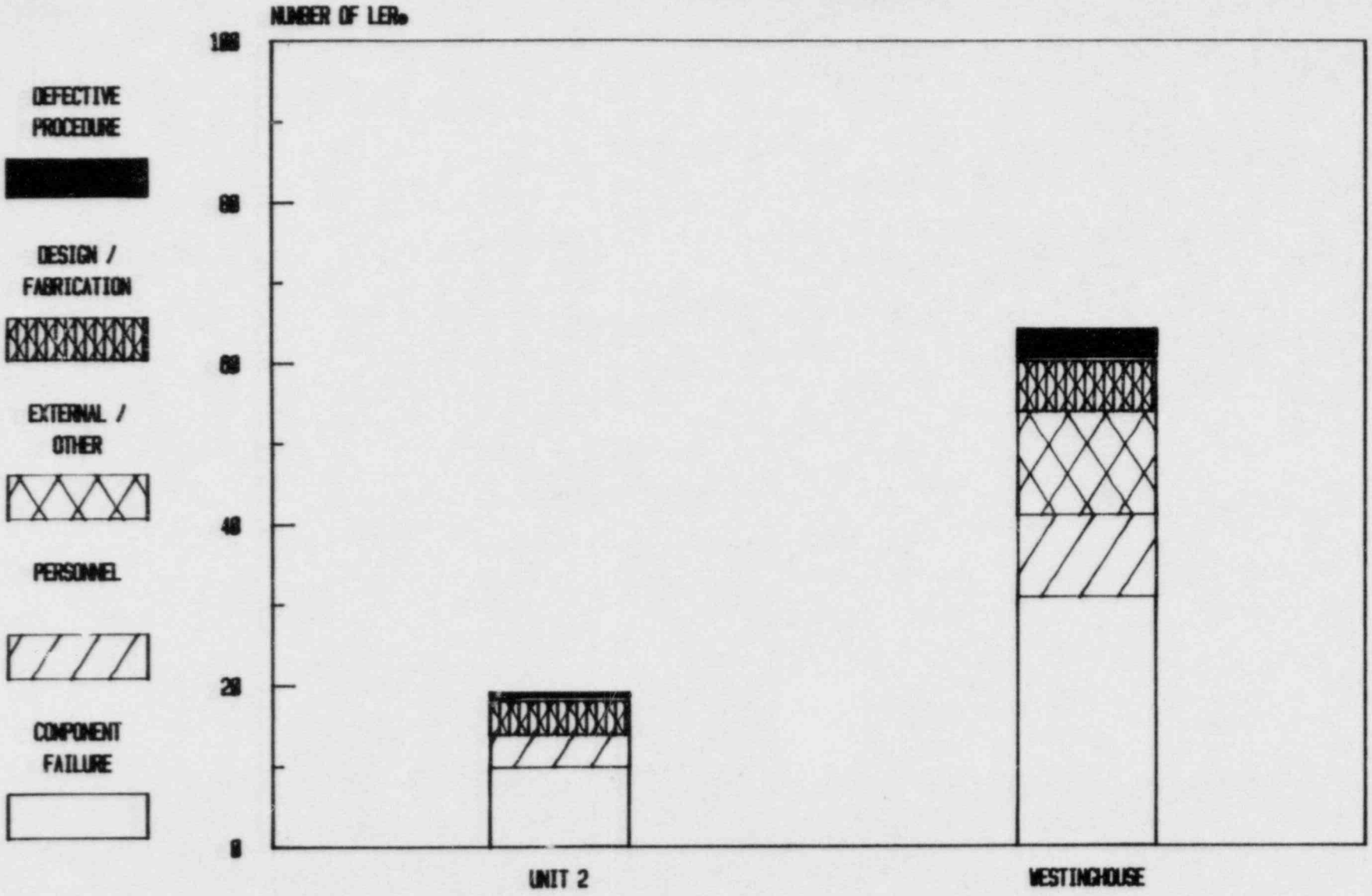
GENERAL ELECTRIC and (BRUNSWICK) LERs

JANUARY 1982 - JANUARY 1983



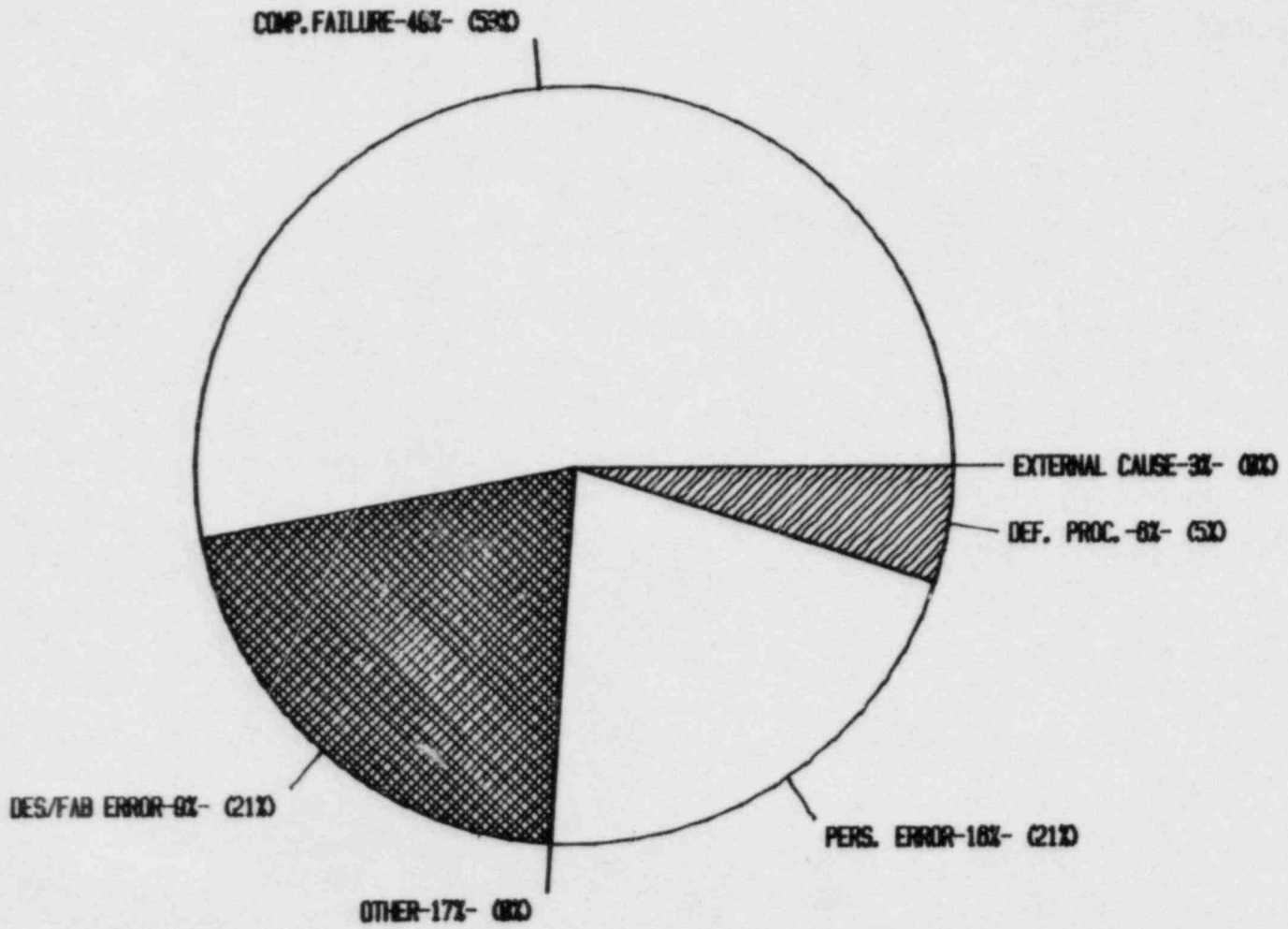
ROBINSON LERs

JANUARY 1982 - JANUARY 1983



WESTINGHOUSE and (ROBINSON) LERs

JANUARY 1982 - JANUARY 1983



CONSTRUCTION DEFICIENCY REPORTS

JANUARY 1982 - JANUARY 1983

HARRIS 1	24
HARRIS 2	14
REGION II AVERAGE	35

INFORMATIONAL DATA

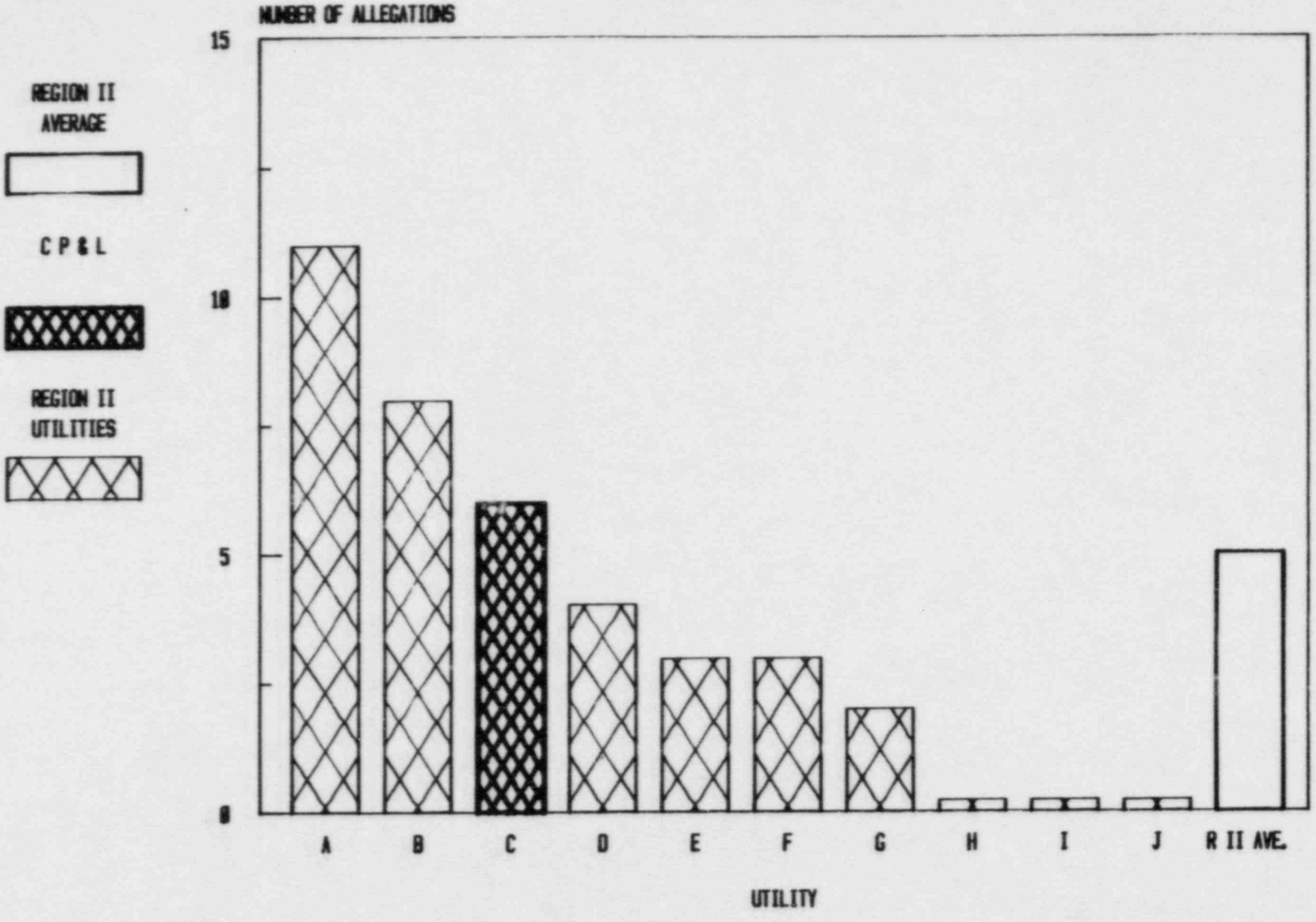
CAUSES OF REACTOR TRIPS

JANUARY 1981 - JUNE 1981/AUGUST 1982 - JANUARY 1983

	TOTAL NUMBER OF TRIPS	AVERAGE TRIPS/UNIT	FEEDWATER/ CONDENSATE/ STEAM GENERATOR (REACTOR) LEVEL RELATED (%)	SURVEILLANCE/ MAINTENANCE RELATED (%)	OTHER (%)
WEST.	135/117	5/4	43/54	14/10	43/36
C E	23/41	3/5	30/46	13/12	48/42
G E	70/83	3/2	10/41	33/13	51/46
B & W	23/18	3/3	26/28	26/17	48/55
bdIIS.	11/6	6/3	36/0	0/33	64/67
Kod.	8/8	8/8	62/75	0/0	38/25

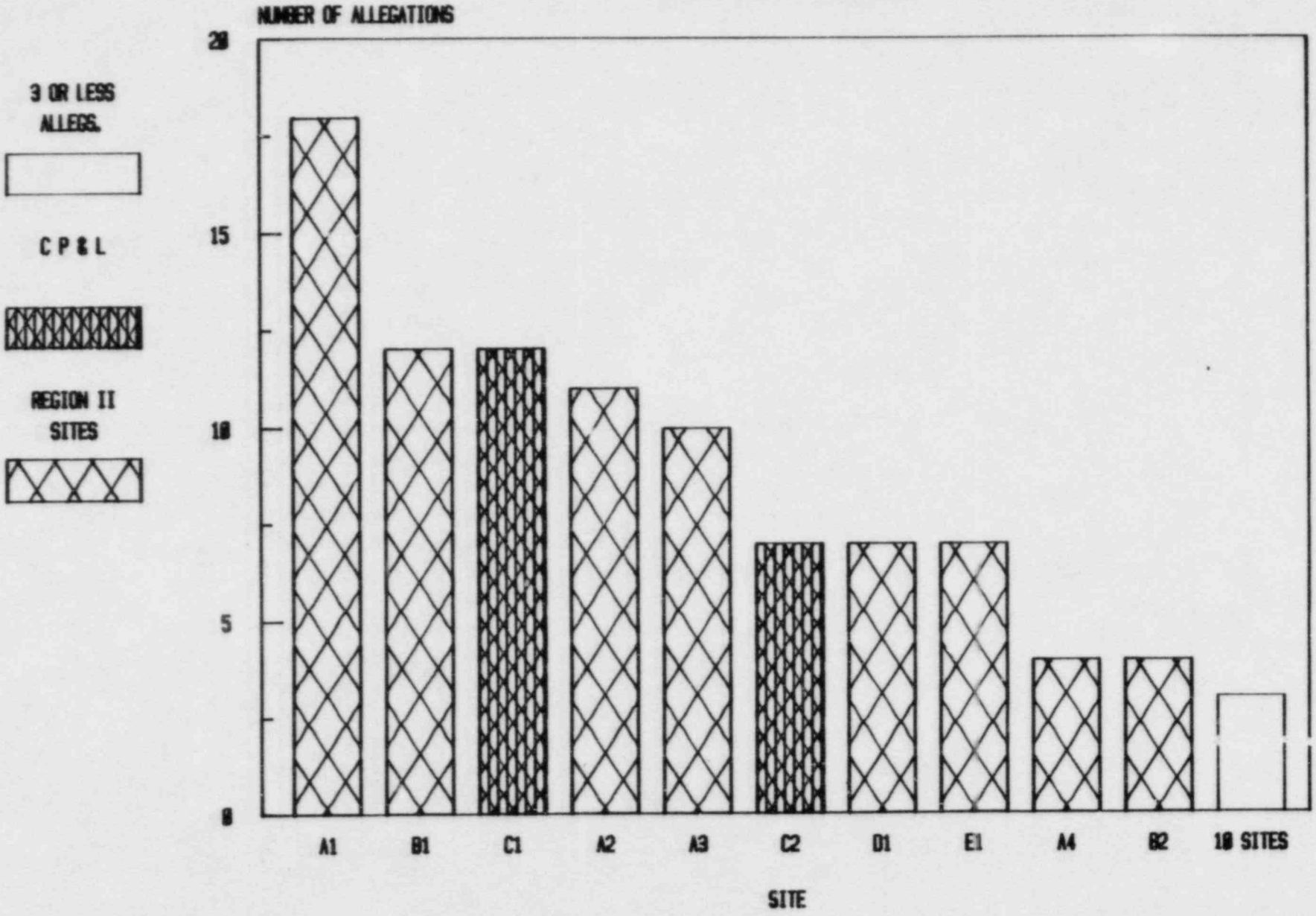
ALLEGATIONS PER UTILITY

JANUARY 1982 - JANUARY 1983

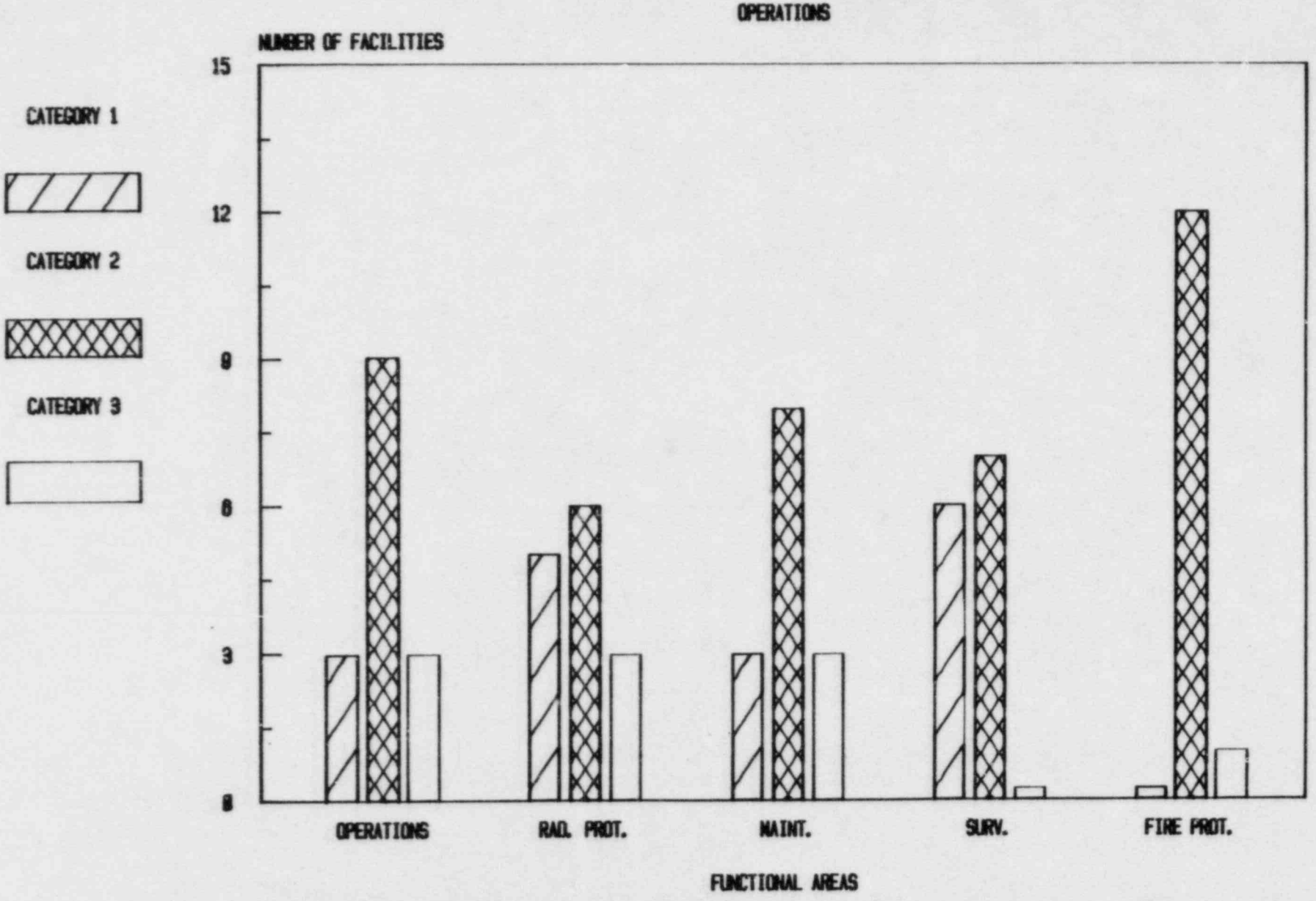


ALLEGATIONS PER SITE

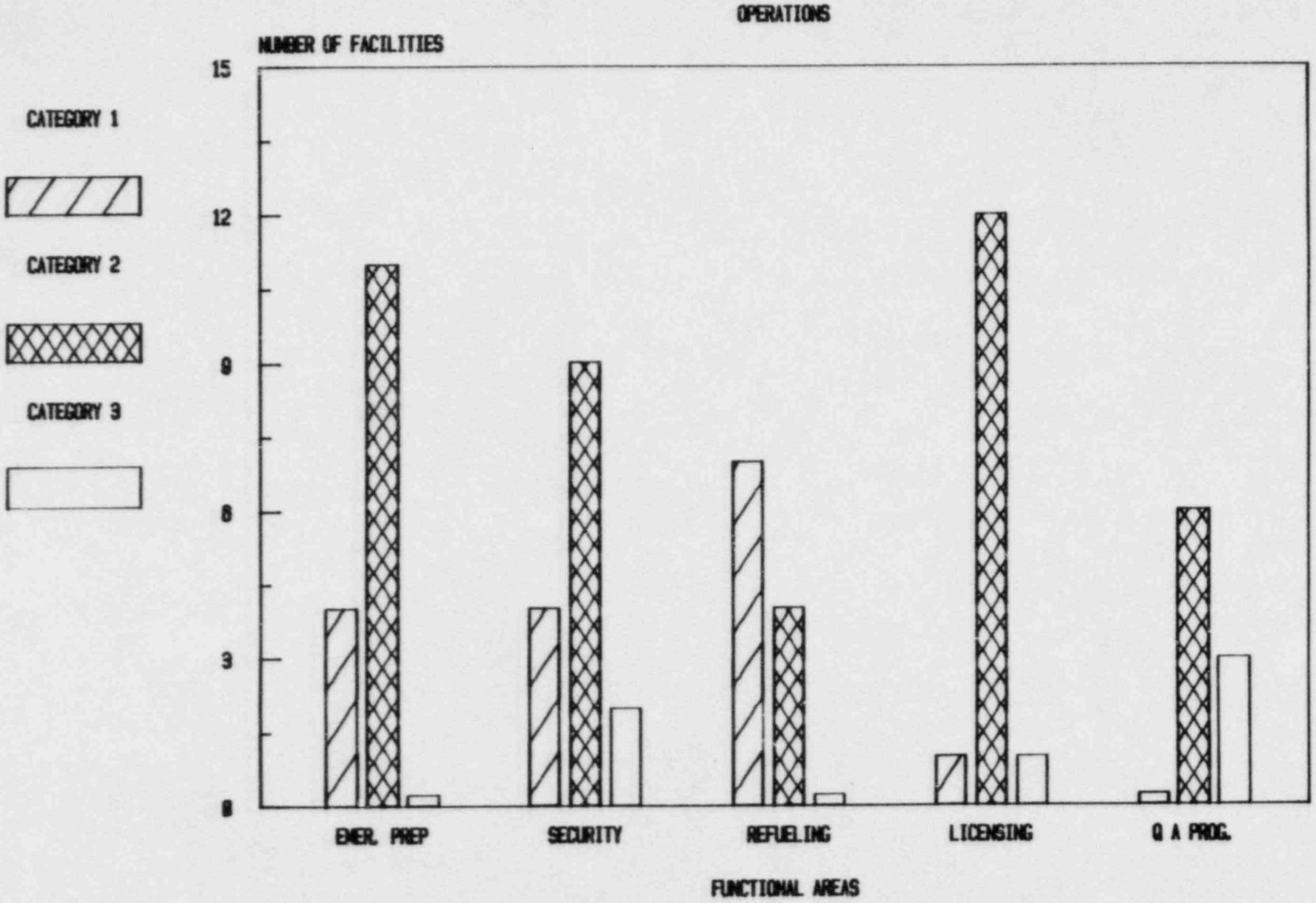
JANUARY 1982 - JANUARY 1983



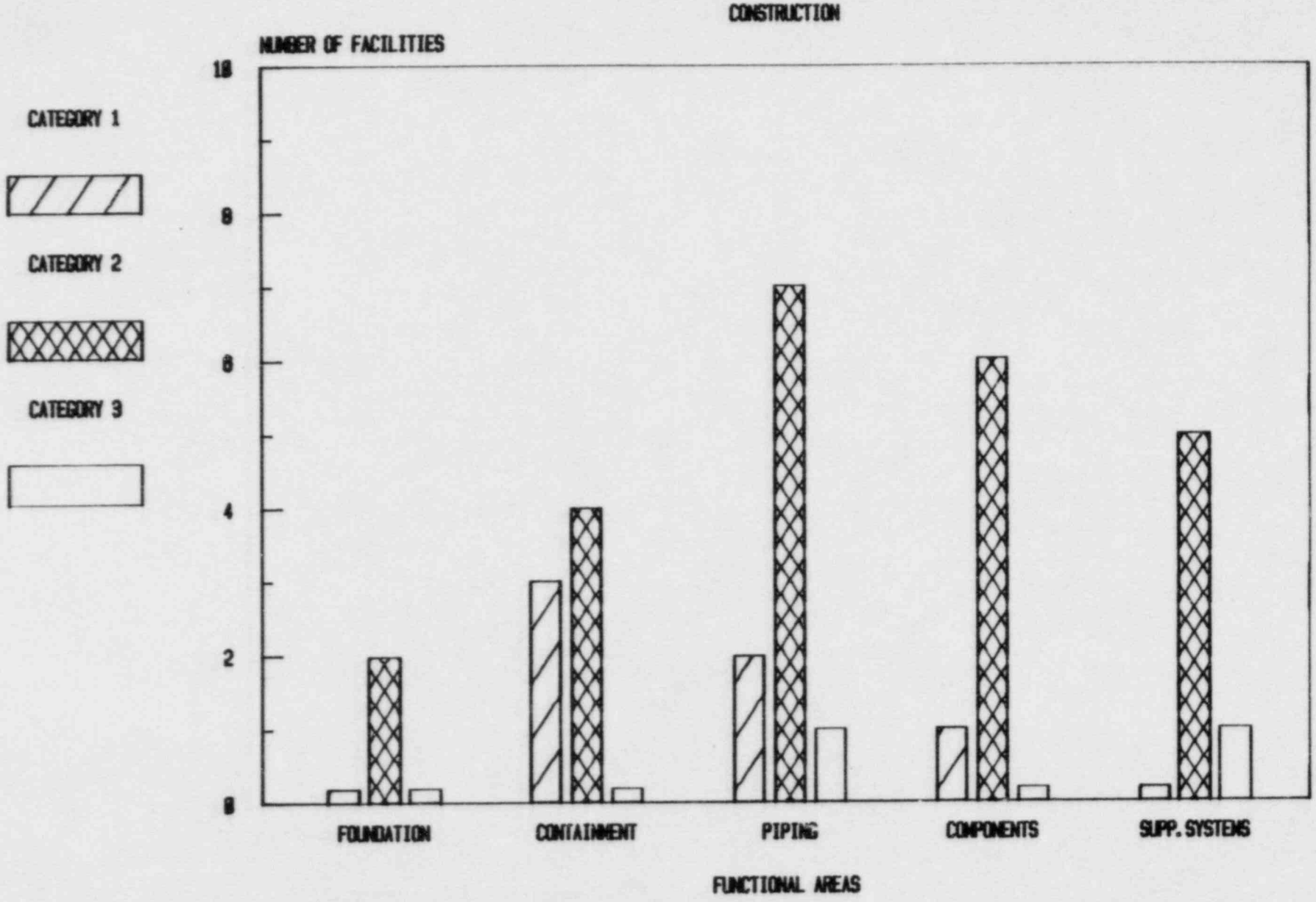
FUNCTIONAL AREA COMPARISON



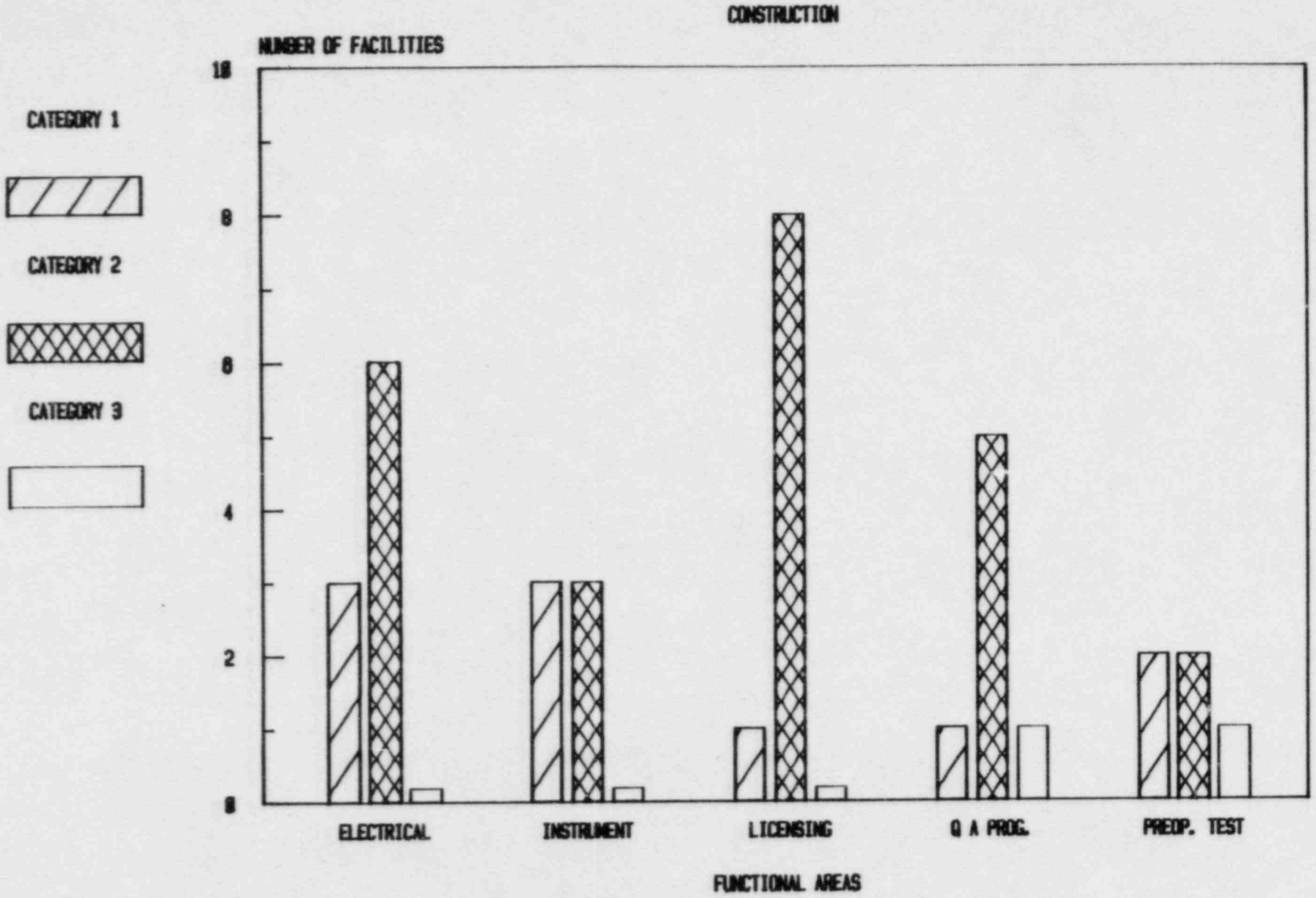
FUNCTIONAL AREA COMPARISON



FUNCTIONAL AREA COMPARISON



FUNCTIONAL AREA COMPARISON



FINDINGS

BRUNSWICK

CATEGORY 1 AREAS

1. EMERGENCY PREPAREDNESS

2. SECURITY AND SAFEGUARDS

BRUNSWICK

CATEGORY 2 AREAS

1. RADIOLOGICAL CONTROLS

BRUNSWICK

CATEGORY 3 AREAS

1. PLANT OPERATIONS
2. MAINTENANCE
3. SURVEILLANCE
4. FIRE PROTECTION
5. REFUELING
6. LICENSING ACTIVITIES
7. QUALITY ASSURANCE

ROBINSON

CATEGORY 1 AREAS

1. SURVEILLANCE

2. REFUELING

ROBINSON

CATEGORY 2 AREAS

1. PLANT OPERATIONS
2. RADIOLOGICAL CONTROLS
3. EMERGENCY PREPAREDNESS
4. SECURITY AND SAFEGUARDS

ROBINSON

CATEGORY 3 AREAS

1. MAINTENANCE
2. LICENSING ACTIVITIES
3. QUALITY ASSURANCE

HARRIS

CATEGORY 1 AREAS

1. CONTAINMENT AND OTHER SAFETY-RELATED STRUCTURES

2. SUPPORT SYSTEMS

HARRIS

CATEGORY 2 AREAS

1. PIPING SYSTEMS AND SUPPORTS
2. SAFETY-RELATED COMPONENTS
3. ELECTRICAL POWER SUPPLY AND DISTRIBUTION
4. QUALITY ASSURANCE

HARRIS

CATEGORY 3 AREAS

1. LICENSING ACTIVITIES

BRUNSWICK - OVERALL EVALUATION

1. SEVERAL MAJOR STRENGTHS AND WEAKNESSES WERE IDENTIFIED.

2. POSITIVE ACTIONS INCLUDED THE ASSIGNMENT OF A SENIOR MANAGER TO THE SITE AND DEVELOPMENT OF A LONG RANGE IMPROVEMENT PLAN.

3. IMPROVEMENT SINCE THE PREVIOUS SALP WAS EVIDENT IN THE AREA OF RADIOLOGICAL CONTROLS.

4. IMPROVEMENT SINCE THE PREVIOUS SALP WAS NOT APPARENT IN THE AREAS OF PLANT OPERATIONS, MAINTENANCE, AND FIRE PROTECTION.

5. SUBSTANTIAL LICENSEE RESOURCES HAVE BEEN COMMITTED TO A LONG RANGE IMPROVEMENT INITIATIVE WHICH IS EXPECTED TO RESULT IN IMPROVED PERFORMANCE.

ROBINSON -- OVERALL EVALUATION

1. SEVERAL MAJOR STRENGTHS AND WEAKNESSES WERE IDENTIFIED.

2. IMPROVEMENT WAS NOTED IN THE AREAS OF RADIOLOGICAL CONTROLS AND SURVEILLANCE TESTING.

3. WEAKNESS IN THE QA AREA IS ATTRIBUTED TO THE CORPORATE AUDIT FUNCTION.

4. PERFORMANCE IN MAINTENANCE AND QA DECLINED FROM THE PREVIOUS SALP EVALUATION.

HARRIS - OVERALL EVALUATION

1. TWO MAJOR STRENGTHS AND A MAJOR WEAKNESS WERE IDENTIFIED.

2. IMPROVEMENT IS NEEDED TO UPGRADE THE TIMELINESS, THOROUGHNESS, AND TECHNICAL SOUNDNESS OF INFORMATION SUBMITTED TO NRC.

3. MANAGEMENT INVOLVEMENT AND SUPPORT FOR QUALITY CONSTRUCTION WAS EVIDENT.

4. NO PROGRAMMATIC BREAKDOWNS WERE IDENTIFIED.

UTILITY EVALUATION

1. SIGNFICANT IMPROVEMENT WAS SHOWN IN SOME AREAS; BUT SEVERAL WEAK AREAS DID NOT SHOW IMPROVEMENT. AN EXTENSIVE LONG-RANGE IMPROVEMENT PROGRAM WAS INITIATED TO CORRECT THESE WEAKNESSES.

2. ALTHOUGH THE LICENSEE EXHIBITED A POSITIVE ATTITUDE TO NRC INITIATIVES, RESPONSES DEMONSTRATED INADEQUATE MANAGEMENT INVOLVEMENT IN LICENSING ACTIVITIES, PARTICULARLY IN THE INTERFACE WITH NRR.

3. CORPORATE MANAGEMENT'S INVOLVEMENT IN ASSURING QUALITY PERFORMANCE OF SITE ACTIVITIES WAS GENERALLY ADEQUATE EXCEPT FOR CONTINUING WEAKNESS IN THE FUNCTIONING OF THE PEU.

4. IMPROVEMENTS WERE NOTED AT BOTH OPERATING SITES IN THE AREA OF RADIATION PROTECTION.

5. WEAKNESS WAS NOTED AT BOTH OPERATING SITES IN THE AREA OF MAINTENANCE.