

September 21, 1998

Carolina Power and Light Company
ATTN: Mr. J. S. Keenan
Vice President
Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461

SUBJECT: MEETING SUMMARY - FIRE PROTECTION IMPROVEMENT PLAN

Dear Mr. Keenan:

This refers to the open meeting that was conducted at your request at the Region II Office on September 17, 1998, to discuss the status of the Fire Protection Improvement Plan. A list of attendees and a copy of your presentation handout are enclosed.

It is our opinion that this meeting was beneficial in that the status of the current fire protection program was provided as well as the scope and schedule for the fire protection improvement plan.

In accordance with Section 2.790(a) of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this meeting, please contact us.

Sincerely,

(Original signed by J. Zeiler)

John Zeiler, Acting Chief
Reactor Projects Branch 4
Division of Reactor Projects

Docket Nos. 50-325, 50-324
License Nos. DPR-71, DPR-62

Enclosures: 1. List of Attendees
2. Licensee Presentation Handouts

cc w/encls - (See page 2)

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cc w/encls:

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Brunswick Steam Electric Plant
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Columbia, SC 29211

Jerry W. Jones, Chairman
Brunswick County Board of
Commissioners
P. O. Box 249
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Dan E. Summers
Emergency Management Coordinator
New Hanover County Department of
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P. O. Box 1525
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William H. Crowe, Mayor
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Distribution w/encls:

- L. Plisco, RII
- M. Ernstes, RII
- D. Trimble, NRR
- J. Coley, RII
- R. Baldwin, RII
- J. Lenahan, RII
- E. Testa, RII
- D. Thompson, RII
- D. Jones, RII
- G. West, RII
- PUBLIC

NRC Resident Inspector
 U. S. Nuclear Regulatory Commission
 8470 River Road, SE
 Southport, NC 28461

OFFICE	RII:DRP	RII:DRS	RII:DRS						
SIGNATURE	<i>GM</i>	<i>HPW</i>	<i>GB</i>						
NAME	GMacDonald	GWiseman	GBelisle						
DATE	9/18/98	9/18/98	9/18/98	9/ /98	9/ /98	9/ /98	9/ /98	9/ /98	9/ /98
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY

DOCUMENT NAME: G:\BRU\MEETINGS\091798.SUM

LIST OF ATTENDEES

Carolina Power & Light

J. Keenan, Vice President - Brunswick
J. Lyash, General Manager - Brunswick
R. Kitchen, Project Manager Fire Protection Improvement Program
W. Dorman, Regulatory Affairs - Brunswick
J. Gawron, Manager Nuclear Assessment Section - Brunswick
G. Miller, Manager Brunswick Engineering Support Section
S. Hardy, Brunswick Engineering Support Section

Nuclear Regulatory Commission

J. Johnson, Deputy Regional Administrator, Region II (RII)
B. Mallett, Director, Division of Reactor Safety (DRS), RII
C. Casto, Deputy Director, Division of Reactor Projects (DRP), RII
V. McCree, Deputy Director, DRS, RII
G. Belisle, Chief, Special Inspection Branch (SIB), DRS, RII
J. Zeiler, Acting Chief, Reactor Projects Branch 4, DRP, RII
C. Patterson, Senior Resident Inspector, Brunswick, DRP, RII
R. Bernhard, Senior Reactor Analyst, DRS, RII
G. Wiseman, Inspector, SIB, DRS, RII
G. MacDonald, Project Engineer, Reactor Projects Branch 4, DRP, RII
*D. Trimble, Project Manager - Brunswick, Nuclear Reactor Regulation
*E. Brown, Resident Inspector - Brunswick, DRP, RII
*G. Guthrie, Resident Inspector - Brunswick, DRP, RII

*Attended via telephone

Fire Protection Program

Brunswick Steam Electric Plant

September 17, 1998

CP&L

Agenda

- Introduction Jack Keenan
- Management Perspective Jeff Lyash
- Improvement Initiative Bob Kitchen
- NAS Perspective Jackie Gawron
- Summary Jack Keenan

Introduction

- **Open Communication On Fire Protection Program**
- **Identification And Assessment Of Significance**
- **World Class Fire Protection Program**
- **Plant Today Is Adequately Protected From The Threat Of Fire**

Management Perspective

Management Perspective

Program Significance

- **Significant Industry Issues**
- **Brunswick Program Weaknesses Evident**
- **Comprehensive Assessment And Improvement Is Needed**

Management Perspective

Recognition And Response

- **Internal Assessments Indicated Problems:**
 - ◆ July 1997 NAS Assessment
 - ◆ January 1998 Operations Self-Assessment
 - ◆ May 1998 Design/Licensing Basis Assessment
 - ◆ June 1998 NAS Triennial Assessment
- **Assessments And Actions in 1997 And Early 1998 Defined Weakness Scope**
- **Insufficient Progress And Increasing Scope Prompted Formation Of A Dedicated Team In May**

Management Perspective

Causes

- **Cause:**

- ◆ Program Was Isolated Within The Organization
- ◆ Primary Focus Was On Fire Fighting

- **Result:**

- ◆ Program Procedures Inconsistencies
- ◆ Standards Issues
- ◆ Licensing Basis Documentation Weaknesses
- ◆ Change Management Deficiencies

- **Fire Protection Was Not Viewed As A Station-Level Program**

Management Perspective

Assessing Potential Safety Impact

- **Assessment Of Impact:**

- ◆ Fire Prevention Program Is Effective
- ◆ Detection Equipment, Suppression Equipment, And Fire Barriers Are In Good Condition
- ◆ Fire Brigade Readiness Is Adequate
- ◆ Alternate Shutdown Capability Sound
- ◆ Staff Questioning Attitude Is Evident
- ◆ NEIL Inspection Adequate

- **Current Status - Acceptable Level Of Safety**

- **Goal - World Class Fire Protection Program**

Management Perspective

Near-Term Actions

- **Operating Shifts Charged With Implementation**
- **Remedial Fire Drills Completed**
- **Expectations Reviewed With Fire Technicians**
- **Site-Wide Review Of Transient Combustible Control Procedures**

Management Perspective

Upgrade Program Objectives

- **Validate Design And Licensing Basis**
- **Consolidate Program Documents And Implementing Procedures**
- **Ensure Procedure Technical Accuracy**
- **Strengthen The Fire Brigade Training And Qualification Program**
- **Structure Implementation To Ensure Long-Term Program Health**

Management Perspective

Sponsorship And Commitment

- **Experienced Manager Leading The Effort**
- **Multi-Disciplined Team Formed To Ensure Long-Term Ownership**
- **Contract Fire Protection Technical Expertise Retained**
- **Additional Manpower And Expertise Being Added To The Existing CP&L Complement**
- **Active Oversight By Plant Management And The Plant Nuclear Safety Committee**
- **Continued Nuclear Assessment Section (NAS) Oversight**

Improvement Initiative

Improvement Initiative

Elements of Program Upgrade

- **Multi-Unit Involvement**
- **Focus Areas**
 - ◆ **Program Structure**
 - ◆ **Procedure Quality**
 - ◆ **Training Program**

Improvement Initiative

Enhance Program Structure

- **Review Licensing Basis**
 - ◆ Upgrade Commitment Document
 - ◆ Develop Design Basis Document
- **Develop Fire Protection Program Manual**
 - ◆ Reflect Ownership
 - ◆ Eliminate Fragmentation And Redundancy
 - ◆ Provide Overview And Linkage To Implementing Documents
- **Require Fire Protection Engineer Review Of Significant Change**

Improvement Initiative

Procedure Quality

- **Validate And Upgrade Periodic Tests**
 - ◆ **Acceptance Criteria**
 - ◆ **Frequency**
 - ◆ **Test Methodology**
- **Upgrade Pre-Fire Plans**
 - ◆ **Improve Organization And Format**
 - ◆ **Simplify Structure**
 - ◆ **Integrate Generic Pre-Fire Plans**
 - ◆ **Develop Pre-Fire Plans For Non-Safety Related Areas**

Improvement Initiative

Upgrade Training Program

- **Develop Training Program Manual**
 - ◆ **Integrate Training Requirements**
- **Review Qualification Programs**
 - ◆ **Validate Staffing Needs And Qualification Requirements**
 - ◆ **Develop/Upgrade Lesson Plans**
 - ◆ **Develop Annual Fire Drill Strategy And Schedule**

Improvement Initiative

Part I - Complete December 1998

- **Upgrade Safety Related Pre-Fire Plans**
- **Review Licensing Basis**
- **Review Key Fire Protection Periodic Test Procedures**
- **Validate Staffing And Qualification Plans**
- **Issue Fire Protection Program Manual**
- **Issue Fire Protection Training Program Manual**

Improvement Initiative

Part II - Complete November 1999

- **Establish Design Basis Document**
- **Incorporate Fire Protection Requirements Into Technical Requirements Manual**
- **Complete Periodic Test Procedures Upgrade**
- **Develop Pre-Fire Plans For Non-Safety Related Areas**

Improvement Initiative

Summary Of Completed Actions

- **Upgrade Team In Place**
- **Clear Responsibility And Ownership Established**
- **Detailed Plan And Schedule Issued**
- **Specific Items Complete**
 - ◆ **Generic Pre-Fire Plans Revised**
 - ◆ **Unit 1 Reactor Building Pre-Fire Plan Revised**
 - ◆ **Penetration Seal Periodic Tests Revised**
 - ◆ **Penetration Seal Lesson Plans Upgraded**
 - ◆ **High Risk Periodic Test Reviews Completed**

NAS Perspective

NAS Perspective

- **NAS Oversight Provided**
 - ◆ **Identified Fire Protection Program Deficiencies**
- **Fire Protection Program Current Status**
 - ◆ **Capable Of Satisfactorily Preventing, Detecting, And Responding**
 - ◆ **Immediate Corrective Actions Appropriate**
 - ◆ **Scope And Schedule For Long-Term Corrective Actions Appropriate**

NAS Perspective

- **Future NAS Oversight**
 - ◆ **Ongoing Monitoring Of Corrective Actions**
 - ◆ **Upcoming Assessments Of Fire Protection**
 - January 1999
 - November 1999
 - ◆ **Continue NAS Screening Of All (56) Technical Programs**
 - Started November 1997
 - Will Complete November 1998

Summary

Summary

- **CP&L Committed To World Class Nuclear Program**
- **Significant Commitment To Fire Protection Program**
- **Lesson Learned: Performance Evaluation**
- **Continual Improvement: Pursuit Of Excellence**