



Carolina Power & Light Company

Brunswick Steam Electric Plant

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Southport, NC 28461-0429

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10CFR 2.201

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
SUPPLEMENTAL RESPONSE TO IE INSPECTION  
REPORT NOS. 50-325/87-32 AND 50-324/87-31

Gentlemen:

In Carolina Power & Light Company's (CP&L) response to the Notice of Violation identified in IE Inspection Report 50-325/87-32 and 50-324/87-31, dated February 9, 1988 (serial: BSEP/88-0099), a commitment was made to provide the results of a review of incoming Engineering Work Requests (EWRs) and a review of the existing EWR backlog in order to apprise your office of the status of this effort.

CP&L, Brunswick plant, has operated since January 4, 1988, using a revised processing scheme for EWRs as delineated in the initial response to Violations A, B, and D of the referenced NRC inspection report. Since that time, the number of outstanding EWRs, despite concentrated resource and management application, has increased from 1873 to 1934. CP&L concludes that this increase is not due to inadequate resource application but rather to unnecessary process complications introduced by CP&L, and to a continued high input rate of EWRs for processing.

When CP&L revised the EWR governing document (ENP-20) in December 1987 to meet the requirements of 10CFR50 Appendix B, it was not realized that in so doing, the stage was set for that system to become duplicative of other corrective action systems for certain classes of technical issues. For example, a primary contributor to the numbers of outstanding EWRs are problems identified by Maintenance personnel as they attempt to deal with problems already identified in the maintenance work management system which is a corrective action system in itself. Thus, for these type problems, processing under a second corrective action system not only constituted a duplication of effort, but also led to process inefficiencies.

Furthermore, the previously committed to "safety significance review" of outstanding backlogged EWRs in early January by the On-Site Nuclear Safety

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group (ONS) was more rigorous than originally envisioned. That review concluded that more than 1600 of the approximately 1900 EWRs outstanding at that time had no safety significance based on the nature of the item or the involved system. The rest having varying degrees of significance based on the same factors. As a result of this documented review, CP&L has concluded that a separate review for safety significance of these EWRs as previously committed to was unnecessary and would only retard resolution of the basic issues raised by the EWRs.

CP&L concluded in late March 1988 that additional programmatic enhancements were necessary to improve the efficiency of processing EWRs at the Brunswick site. As a result, a number of improvements are being or have been incorporated into a revision to the previous ENP-20 document and related instructions as follows: (Note that only the major improvements affecting the previous violation response are discussed. Lesser improvements were also made.)

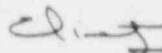
- A. EWRs which track completion of routine administrative action items as opposed to EWRs requesting technical assistance on technical issues were deleted from inclusion in the EWR program. A separate instruction enveloping these under a separate action item tracking system was recently approved. Result: The number of outstanding EWRs decreased by approximately 316.
- B. A new procedure, ENP-12.1, was issued formalizing a memoranda as an approved vehicle for conveying design information to other plant groups if the request for that design information was borne out of a problem for which the responsibility for resolution continued to rest with the other plant group. What this initiative accomplished was to avoid duplication between the various plant corrective action systems. The expected result of this is a greatly reduced input level of EWRs as this new process becomes more established.
- C. ENP-20 has been revised to streamline EWR processing as follows:
  1. The previously committed to review for safety significance and operability concerns by the originator's supervisor was deleted. This review offered little added value and tended to confuse personnel not accustomed to dealing with such terms. This review will be addressed by an enhanced Technical Support Project Engineer review for the same considerations (see below).
  2. A formal documented review by the Technical Support Project Engineer, normally within three working days of receipt, was instituted in place of the previous 30-day documented review by the Investigating Engineer. In most cases, this review can easily be done by the Project Engineer within this time period. In those few cases where it cannot, the EWR is considered potentially significant and in need of prompt and dedicated attention to assess the safety/operability significance.

3. The previous safety/operability review and documented basis by the Investigating Engineer within a nominal 30 days has been deleted because of the expanded Technical Support Project Engineer review above. The Investigating Engineer is permitted a nominal 40 calendar days versus the previous 30 days in which to complete other aspects of the investigation leading to a planned disposition for the EWR. If this review does not lead to a completed resolution of the EWR; i.e., no further action required, the Investigative Engineer is then required to document why deficiencies classified as conditions adverse to quality do not represent an operability or immediate nuclear safety concern.
4. The previous requirement to fully review all backlogged EWRs to the revised screening instructions has been deleted. Instead, only new, incoming EWRs and those backlogged EWRs assessed by ONS as having some safety significance will be subjected to the full revised processing.
5. The requirement for EWRs to be left outstanding to track problems passed to the plant Integrated Planning and Budgeting System (IPBS) has been deleted. These EWRs serve no useful purpose and fail to provide adequate budgetary controls. Commencing in 1988, budgetary summary reports used to make budgetary decisions by the site Vice President and his principle assistants contain information regarding the source (e.g., deficiency, betterment) and safety significance of budgetary line items in order to assist in those budgetary decisions.
6. The system for extending due dates for conditions and significant conditions adverse to quality has been strengthened through the use of a special extension form which provides for a written basis for the extension request and which requires the concurrence of the plant General Manager. This system replaces the use of monthly management reports for this purpose as that process proved inefficient.
7. The working definitions of conditions adverse to quality and significant conditions adverse to quality have been enhanced to provide clarification for the system users. The previous definitions were too subject to interpretation to be fully useful.
8. The dedicated EWR Project Team will be incorporated by June 15, 1988, into the existing plant structure. Placing the resources involved in the EWR effort back under line management (rather than as a separate project team) permits greater flexibility to adjust the team resources than before and offers two Project Engineers to help drive the effort rather than one Senior Engineer previously. Part of the delay associated with processing of difficult EWRs proved to be the amount of management guidance which the Team Leader needed to provide. By providing, in effect, two Team Leaders, this factor has been reduced. The EWR team will not physically relocate--only the reporting arrangement will change.

May 26, 1988

Based upon these changes, CP&L believes a commitment at this date regarding the expected date when full compliance will be achieved (all backlogged EWRs reviewed to the point of disposition determination) would be premature. Accordingly, CP&L proposes to implement the changes described above during May 1988, and to advise the NRC by September 15, 1988, of progress made and an expected date for full compliance.

Very truly yours,



C. R. Dietz, General Manager  
Brunswick Steam Electric Plant

MJP/srg

Enclosure

cc: Dr. J. N. Grace  
Mr. E. D. Sylvester  
BSEP NRC Resident Office