



Carolina Power & Light Company

Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461-0429
September 23, 1988

88 SEP 27 9:50

FILE: B09-13510E
SERIAL: BSEP/88-0971

Dr. J. Nelson Grace, Administrator
U. S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street NW
Atlanta, GA 30323

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
LICENSE NOS. DPR-71 AND DPR-62
DOCKET NOS. 50-325 AND 50-324
COMMENTS ON SEPTEMBER 8, 1988, ENFORCEMENT CONFERENCE

Dear Dr. Grace:

On September 8, 1988, the Brunswick Nuclear Project, Carolina Power & Light Company (CP&L), was invited to attend an enforcement conference at the Region II headquarters in Atlanta. The subject of that enforcement conference was 1) DC Motor Design, 2) HPCI/RCIC Steam Line Detection Instrumentation, and 3) Silicon Bronze Bolts. Following CP&L's presentation at that meeting, a concern was raised by members of your staff as to the status of an evaluation performed in conjunction with the HPCI/RCIC event. The purpose of this letter is to clarify this concern.

While presenting CP&L's position on the HPCI/RCIC steam line detection instrumentation event, Mr. J. S. Boone stated that an evaluation of the issues had been completed which indicated there was no safety significance to this event. On September 12, 1988, the site Senior Resident Inspector requested a copy of the evaluation in order that he might review its contents. The inspector was told at that time that while the evaluation had received the second party technical review prior to the enforcement conference, the site Quality Assurance unit review had not been completed. At this point, the inspector became concerned that the evaluation referred to in the September 8, 1988, meeting was, in fact, not a "final" evaluation. CP&L provided additional information to the inspector to illustrate why CP&L considered the evaluation technically complete and is providing that information herein to provide your staff with a better understanding.

8810120400 880923
PDR ADDOCK 05000324
PNU

LEAS
1/0

1101

In making our presentation, CP&L's intent was to state that the final concluding evaluation of the issue had been completed. It was not intended to imply that the final evaluation had been finalized; i.e., fully reviewed and approved. In fact, the reviews required by regulatory documents and our Corporate QA Program had been completed; the remaining incomplete site QA review was an incidental plant requirement.

ANSI-N45.2.11 sets forth the requirements for the performance of design activities, one of which is calculations. It requires that design verification of design activities shall be performed by any competent individual(s) or group(s) other than those who performed the original design but who may be from the same organization. Prior to his presentation on September 8, Mr. Boone ensured that the evaluation performed by himself had been properly verified, thus satisfying the ANSI requirement. As this evaluation involved calculations, it was performed under the plant engineering evaluation program which is used for this as well as other purposes. Historically, this plant procedure has specified site QA review of safety-related engineering evaluations even though the Corporate QA program and ANSI-N45.2.11 do not require a QA review of calculations. As CP&L had documented compliance with ANSI-N45.2.11 prior to the presentation, it was not believed that this item would be a concern. This required QA/QC review has subsequently been completed with no change in the original conclusions of the evaluation.

CP&L recognizes the requirement for clear and concise communications between itself and the Nuclear Regulatory Commission. CP&L also recognizes that, in this instance, and in several instances in the past, communications has not been as effective as desired. In an effort to improve communications between our organizations, awareness sessions are being scheduled between the plant General Manager and supervisory personnel, as well as those professional personnel who may one day assume a management position (Category 2 personnel). These sessions are intended to highlight the need for effective communications and also to provide the guidance required to assure clear and concise communication. These sessions are scheduled to be completed by October 7, 1988. Additional, disciplinary action is being reviewed, as appropriate, due to the clear prior direction personnel had received from management to ensure all statements were both clear and concise.

Mr. J. Nelson Grace

-3-

September 22, 1988

If you have any questions or concerns on this or other issues, please contact either myself or the plant General Manager, Mr. J. L. Harness.

Very truly yours,



P. W. Howe, Vice President
Brunswick Nuclear Project

RMP/ah

cc: Mr. B. C. Buckley
Dr. J. N. Grace
BSEP NRC Resident Office