

CP&L

Carolina Power & Light Company

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R. B. RICHEY, Manager
Licensing & Nuclear
Fuel Department

SERIAL: NLS-88-211

Dr. J. Nelson Grace, Regional Administrator
United States Nuclear Regulatory Commission
101 Marietta Street, NW
Atlanta, GA 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
CONFIRMATORY ORDER EA-82-106
BRUNSWICK IMPROVEMENT PROGRAM (BIP)

Dear Dr. Grace:

SUMMARY

Based on the results of periodic reviews, historical and future enhancements to management programs, and ongoing improvements in procedural controls, Carolina Power & Light Company (CP&L) requests that Confirmatory Order EA-82-106 (imposing the requirements of the Brunswick Improvement Program) be discontinued. The discontinuance of this 1982 order would facilitate evolving management and process improvements, optimization of scope definitions for procedures, surveillances, reviews, etc. and the implementation of lessons learned since 1982.

CHRONOLOGY

October 29, 1982 - CP&L submitted the BIP to the NRC. The BIP specified 134 detailed tasks in support of 7 basic objectives.

December 22, 1982 - The NRC imposed the requirements of the BIP in Confirmatory Order EA-82-106.

April 3, 1984 - Region II advised that they "... have inspected each task action item in the BIP and that CP&L has satisfied the requirements imposed by Confirmatory Order EA-82-106."

May 30, 1986 - CP&L issued the final six-month status report on ongoing BIP issues.

October 26, 1987 - Based on the results of BIP specified surveillances, CP&L concluded that line management has continued to exercise strong management controls and asked the NRC to permit the scope of these surveillances to be modified to achieve an appropriate level of attention and review.

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DISCUSSION

By Confirmatory Order EA-82-106 dated December 22, 1982, the NRC imposed the requirements of the BIP.

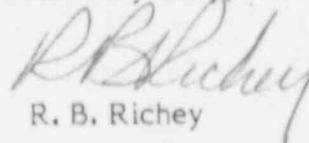
The BIP specified 134 detailed tasks that ranged from filling a Senior Specialist position to 100 percent QA review of Technical Specification requirements every three years, to reviewing and implementing, as appropriate, each of the 167 recommendations that resulted from Management Analysis Company's review of CP&L's Corporate QA Program.

On April 3, 1984, Region II advised that they "... have inspected each task action item in the BIP and that CP&L has satisfied the requirements imposed by Confirmatory Order EA-82-106." Further, Region II stated that "With regard to ongoing items, we find that a status report submitted at six-month intervals will be satisfactory." CP&L's final six-month status report (NLS-86-166) dated May 30, 1986 stated that the final ongoing items were completed.

While each of the specific BIP actions taken was appropriate at the time of implementation, some of the implemented actions are either no longer necessary or the objectives could be achieved in a more efficient manner. For instance, as described in CP&L's October 26, 1987 letter (Serial No. NLS-87-188), CP&L previously committed, per BIP requirements, to perform periodic reviews in five areas. The results of these reviews lead to the conclusion that the scope of these reviews should be modified. Additionally, management controls should not be limited by such detailed 1982 requirements as filling a Senior Specialist position (BIP Item I-1, Task 1).

Carolina Power & Light Company continues to monitor performance to assure that appropriate management and programmatic controls are in place to meet 1988 demands and to assure strict compliance with regulatory requirements. Therefore, based on our implementation of the BIP requirements, the NRC's inspection finding that CP&L has satisfied the requirements of Confirmatory Order EA-82-106, and to facilitate contemporary management improvement efforts, CP&L requests that Confirmatory Order EA-82-106 be continued.

Yours very truly,



R. B. Richey

PDM/mf (5455WRM)

cc: Mr. B. C. Buckley
Mr. W. H. Ruland
NRC Document Control Desk