



Carolina Power & Light Company  
P.O. Box 10429  
Southport, NC 28461-0429

February 25, 1998

SERIAL: BSEP 98-0044

U. S. Nuclear Regulatory Commission, Region II  
ATTN: Mr. Billy R. Crowley  
Atlanta Federal Center  
61 Forsyth Street, SW, Suite 23T85  
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  
INFORMATION TO SUPPORT THE MAINTENANCE RULE  
BASELINE TEAM INSPECTION

Gentlemen:

By letter dated January 23, 1998, the NRC announced that the Maintenance Rule baseline inspection at Carolina Power & Light (CP&L) Company's Brunswick Steam Electric Plant (BSEP) is scheduled for March 16 - 20, 1998. To support the inspection team's in-office preparation, the NRC requested submission of information about the Maintenance Rule program at BSEP and its implementation.

Enclosure 1 to this letter is an index of the supporting documentation being provided to the NRC, and Enclosure 2 contains the requested information. Please refer any questions regarding this submittal to Mr. Warren J. Dorman, Supervisor - Licensing, at (910) 457-2068.

Sincerely,

Keith R. Jury  
Manager - Regulatory Affairs  
Brunswick Steam Electric Plant

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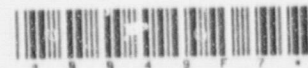
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Enclosures:

1. Index of Supporting Documentation
2. Requested Information

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Mr. Billy K. Crowley  
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cc (with Enclosure 1 only):

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

U. S. Nuclear Regulatory Commission, Region II  
ATTN: Mr. Luis A. Reyes, Regional Administrator  
Atlanta Federal Center  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, GA 30303

U. S. Nuclear Regulatory Commission  
ATTN: Mr. Charles A. Patterson, NRC Senior Resident Inspector  
8470 River Road  
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission  
ATTN: Mr. David C. Trimble, Jr. (Mail Stop OWFN 14H22)  
11555 Rockville Pike  
Rockville, MD 20852-2738

The Honorable Jo A. Sanford  
Chairman - North Carolina Utilities Commission  
P.O. Box 29510  
Raleigh, NC 27626-0510



## ENCLOSURE 1

### BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62 INFORMATION TO SUPPORT THE MAINTENANCE RULE BASELINE TEAM INSPECTION

#### INDEX OF SUPPORTING DOCUMENTATION

1. Copy of Licensee Maintenance Rule Program
  - ADM-NGGC-0101, Revision 9, "Maintenance Rule Program"
2. Copy of Procedures That Directly Relate to and Support the Maintenance Rule Program
  - OAP-025, Revision 4, "BNP Integrated Scheduling"
  - EGR-NGGC-0351, Revision 5, "Condition Monitoring of Structures"
  - OPLP-04, Revision 23, "Corrective Action Management"
3. Total Listing of Structures, Systems and Components (SSCs) Considered
4. List of SSCs Determined to be Within the Scope of the Maintenance Rule
5. List of High Safety Significant (HSS) SSCs
6. List of Low Safety Significant (LSS) Standby SSCs in Scope of Rule
7. Updated Risk Ranking of SSCs Including the Numerical Importance Measure(s) for Each System and the Criteria Utilized to Establish the Risk Significance of These SSCs for the Maintenance Rule
  - "Identification of High Safety Significant Functions Within Maintenance Rule Scope"
8. Listing of Top 20 LSS SSCs Which Missed the Criteria for Being Risk Significant
9. Any Updated Material to the Initial Individual Plant Examination (IPE) Submittal
10. Definition of "Availability" at Site
  - Excerpt from ADM-NGGC-0101, "Unavailability Definition"
  - "Guidance for Determining Unavailability for Maintenance Rule Systems"
11. List of SSCs Placed Within a(1) and a(2) Categories of the Maintenance Rule
  - "Maintenance Rule a(1) List"

12. Copies of Equipment Status Documents (Limiting Condition for Operation Logs, Equipment Tagging Logs, etc.) Which Provide an Understanding of What Equipment (Balance of Plant and Safety Related) Was Out of Service for the Last Six Months
  - "Clearances Initiated Since 8/1/97"
  - "LCOs Initiated Since 8/1/97"
13. Copies of Senior Reactor Operator and Reactor Operator Logs for the Last Six Months
14. List of Condition Adverse to Quality Reports and Work Requests Written on Each a(1) System Within the Last Two Years
  - "Maintenance Rule a(1) Systems by System Code 02/20/96 - 02/20/98"
  - "Open Backlog WRJOs Initiated Between 1/1/96 1/31/98 By System"
  - "Completed WRJOs Initiated Between 1/1/96 1/31/98 By System "
15. Background Explanations for SSCs Currently Assigned to the a(1) Category
  - "Expert Panel a(1) System Review"
  - Applicable Condition Reports
16. Current Performance Criteria and Goals for SSCs
  - "Maintenance Rule Performance Criteria Summary"
17. Current Maintenance Rule Trending Data for SSCs
  - "Maintenance Rule Performance Summary"
  - "Maintenance Rule Unavailability Trend"
18. List of Functional Failures for the Current Operating Cycle With Any Repetitive Failures Identified
  - "Maintenance Rule Functional Failures"
  - "Repeat Maintenance Rule Functional Failures"
19. List of SSCs Classified as "Inherently Reliable"
  - SSCs at Brunswick were not classified as "Inherently Reliable"
20. SSCs Classified for "Run to Failure"
  - SSCs at Brunswick were not classified as "Run to Failure"
21. Qualifications and Backgrounds of Expert Panel Members
  - "Expert Panel Qualification Information"
  - "Expert Panel Resumes"
22. Minutes of Expert Panel Meetings
23. Listing of SSCs Within the Probabilistic Risk Assessment (PRA) But Were Downgraded/Changed to LSS or Excluded from the Maintenance Rule by the Expert Panel and the Rationale for the Change



24. Copy of any Internal or External Maintenance Rule Program Assessments or Audits
- Assessment No. ESS-98-0013, "Brunswick Nuclear Power Plant Maintenance Rule a(3) Periodic Assessment," dated 01/19/98 - 01/23/98
  - Assessment No. 97-00177-10, "Maintenance Rule Implementation," dated 04/14/97 - 04/18/97
  - Assessment No. 97-00177-15, "BESS Maintenance Rule Implementation," dated 12/10/96 - 01/24/97
  - Report No. M-96-05, "The Maintenance Interface with the Maintenance Rule," dated 07/29/96 - 08/02/96
  - Report No. 96-08-MA-C, "Maintenance Rule Pre-Implementation Assessment," dated 05/24/96
  - Report No. 95-00037, "Maintenance Rule Implementation," dated 02/08/95 - 02/28/95
25. Copies of Condition Adverse to Quality Reports Associated with Identification of Problems During Implementation of the Maintenance Rule, Including PRA Aspects
- Condition Report No. 97-03283
  - Condition Report No. 97-01206
  - Condition Report No. 97-01445
  - Condition Report No. 97-01348
  - Condition Report No. 97-00408
  - Condition Report No. 97-00427
  - Condition Report No. 97-00571
  - Condition Report No. 97-01440
  - Condition Report No. 97-01148
  - Condition Report No. 98-00217
  - Condition Report No. 98-00189
  - Condition Report No. 98-00183
  - Condition Report No. 98-00220
  - Condition Report No. 98-00221
  - Condition Report No. 98-00222
  - Condition Report No. 97-00683
  - Condition Report No. 96-02899

26. Current Organization Chart Depicting Key Personnel Involved in the Maintenance Rule Implementation and a List of Their Office Telephone Numbers
- "BNP Maintenance Rule Program Staff"
  - "Engineering at the Brunswick Plant"
27. Specific Site Contacts for Logistics Information and Additional Correspondence Applicable to this Inspection Activity
28. Listing of Spray Shields and Doors/Hatches Assumed Operational in the PRA for Internal Flooding
29. List of Acronyms and Alpha-Numeric Descriptions of Equipment Within the Scope of the Maintenance Rule
30. Criteria Used by the Expert Panel to Determine Risk Significance of SSCs When the Plant Was Not in Operational Condition 1
31. Listing of Reliability and Availability Basic Events in the PRA Used for Risk Ranking Compared to the Performance Criteria Established for Those Systems Under the Maintenance Rule
- "PSA Evaluation of Maintenance Rule Performance Criteria," dated February 18, 1998
32. The Shutdown Safety Assessment Tool/Chart/Matrix Showing Which Systems Were Being Used for Maintaining Decay Heat Removal, Reactor Coolant System Inventory Control, Electric Power Availability, Reactivity Control, and Containment Integrity While Shutdown
- 0AP-22, "BNP Outage Risk Management," Revision 2
33. Fault Trees for Turbine Driven Reactor Core Isolation Cooling System and the Emergency Diesel Generators
34. A Comprehensive List of SSCs Containing Items 3, 4, 5, and 6 Above, and the Basis for Including the SSC in Scope



ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
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