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Carolina Power & Light Company

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Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, NW
Atlanta, GA 30303

RESPONSE TO
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) BOARD
ASSESSMENT OF BRUNSWICK, H. B. ROBINSON, AND SHEARON HARRIS PLANTS
REPORT NOS. 50-325/82-15, 50-324/82-15
50-261/820-17, 50-400/82-14, AND 50-401/82-14

Dear Mr. O'Reilly:

Mr. R. C. Lewis' letter of May 3, 1983 forwarded to Carolina Power & Light Company (CP&L) the results of the SALP Board findings for CP&L plants for the time period January 1, 1982 through January 31, 1983. The purpose of this letter is to provide CP&L's response to those findings.

Carolina Power & Light Company concurs with the objectives of the SALP Program. NRC has stated that the SALP review process should not only aid in improving licensee performance, but provide a basis for allocation of NRC inspection resources and improve the overall NRC inspection program. To accomplish these objectives, we understand that the NRC's SALP ratings have the following meanings:

Category 1

Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2

NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

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Category 3

Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

We appreciate NRC's response in this SALP Report to our comments on the 1982 SALP Board Report in which we requested more timely evaluation of our performance and recognition of corrective actions and improvements underway. We believe CP&L's nuclear program is achieving safe performance, and we feel that programs currently being implemented will result in substantial improvement in areas where weaknesses have been identified.

In response to the opportunity provided to comment on the current report, we have attached a detailed discussion of those areas which we believe should be rated higher. We have likewise described corrective and other actions currently underway to improve our performance. We encourage you to consider these comments in drafting the transmittal letter which formally issues the SALP Board Assessment as an NRC report.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

SRZ/lr (037SRZ)
Attachment

cc: NRC Resident Inspector (SHNPP)
NRC Resident Inspector (BSEP)
NRC Resident Inspector (HBR)

DETAILED COMMENTS CONCERNING
PERFORMANCE ANALYSIS FOR SHEARON HARRIS UNITS 1 & 2

1. Soils and Foundations (SALP Board Rating: Not Rated)

The SALP Board's comments on this area state: "There has not been sufficient licensee or NRC activity in this area to justify a rating." However, we believe the SALP Board's analysis section does provide sufficient justification for a rating and that rating should be Category 1.

NRC's criteria for rating an area are:

- (1) Sufficient inspection activity must be conducted in that area during the review period.
- (2) There must be sufficient licensee work activity in that area to allow valid evaluation.

We believe these criteria were met in this case as follows:

- (1) The SALP Board's analysis section for this area states: "During this evaluation period six inspections were performed by regional based inspectors. Additionally, routine inspections were performed in this area by the resident inspector." . . . "No violations or deviations were identified."
- (2) The Board also stated: "The inspections involved examination of QA implementing procedures, soils testing laboratory, records, and backfilling of the excavations for Units 3 and 4 which have been cancelled. The majority of the soils and foundation work had been completed for Units 1 and 2. The remaining activities in this area were primarily concerned with underground piping systems.

The QA/QC procedures and controls met NRC requirements. The records were generally complete, well maintained, and retrievable. Equipment in the testing laboratory was properly calibrated and testing and backfill operations were conducted in accordance with ASTM standards, procedures, and specification requirements."

While it is accurate to conclude that less total volume of earth was placed during the year, ditch and structural backfill was active all last year except when hampered by bad weather. The required control of these activities did not diminish significantly. As an indication of this level of activity, at least 904 soil density tests were performed to control backfill in the multitude of structural backfill tasks.

For the above reasons, we believe a Category 1 rating is justified.

2. Containment and Other Safety-Related Structures (SALP Board Rating: Category 1)

No comments.

3. Piping Systems and Supports (SALP Board Rating: Category 2)
No comments.
4. Safety-Related Components (SALP Board Rating: Category 2)
No comments.
5. Support Systems (SALP Board Rating: Category 1)
No comments.
6. Electrical Power Supply and Distribution (SALP Board Rating: Category 2)
No comments.
7. Instrumentation and Control Systems (SALP Board Rating: Not Rated)
No comments.
8. Licensing Activities (SALP Board Rating: Category 3)

As this is a new category which has not previously been rated in a CP&L SALP Report, it is difficult to establish a benchmark for a subjective rating of Licensing Activities. However, we believe the SALP Board's evaluation is not a balanced assessment. The Board chose to emphasize several isolated problem areas for review while ignoring the vast majority of CP&L's work efforts which we believe were thorough, timely, and responsive. An overall measure of CP&L's thoroughness in these areas was our performance in the major licensing work effort to respond to the FSAR and ER Acceptance Review and Safety Review Questions. Responses to 99 of the 116 Acceptance Review Questions were submitted on January 29, 1982 and June 30, 1982 and were incorporated into the FSAR and ER in Amendments 2 and 3. With respect to NRC Safety Review Questions, CP&L responded to 659 out of 705 safety review questions within the original NRC/CP&L schedule. During this period, CP&L produced and filed four FSAR and five ER amendments. Carolina Power & Light Company also responded to over 300 proposed intervenor contentions simultaneous with the above. These efforts resulted in closing many key review areas such as QA and Preoperational Testing and severely limited the number of contentions which were admitted to the proceedings. As a result of what we feel were thorough CP&L responses, NRC was able to publish a Draft Safety Evaluation Report with a much more limited list of open items. Also, as a measure of CP&L's thoroughness in responding to NRC's environmental questions, NRC recently was able to publish a SHNPP Draft Environmental Statement with no open environmental issues, to our knowledge. These efforts appear to have been ignored in the appraisal.

Specifically, the SALP Board's "Analysis" section cites the following licensing activities as its basis for their evaluation:

- Reactor Systems Review of the FSAR
- Instrumentation and Controls Review
- Mechanical Engineering Review
- Radwaste Systems Review
- Reservoir Reanalysis Subsequent to Cancellation of Unit 3 and 4
- Environmental Engineering

With respect to Reactor Systems review, NRC sent to CP&L 109 safety review questions. The Company submitted timely responses to 101. The NRC then requested clarification on 27; CP&L has responded to 17. This is a measure of CP&L's thoroughness, since the majority of issues were closed in a timely manner to NRR's satisfaction. Many of the remaining unresolved items are NRC issues generic to Westinghouse plants and are not due to CP&L unresponsiveness.

With respect to Instrumentation & Control review, NRC sent 56 safety review questions on July 30, 1982. CP&L responses were provided in two meetings (August 16-19, 1982 and September 14-16, 1982). These actions were technically responsive, thorough, and timely.

With respect to Mechanical Engineering Review, NRC conducted a site visit on November 2, 1982. The NRC then sent 45 safety review questions on December 22, 1982. Responses were presented in a February 1-3, 1983 meeting and all but seven were resolved. We believe this is a measure of CP&L's thorough and timely resolution of these issues. The remaining questions are being pursued vigorously.

In assessing the Radwaste Systems Review, NRR failed to conduct a timely review in this area in accordance with NRR's schedule, and questions were not submitted to CP&L until just before the DSER and DES inputs were due. CP&L mobilized the necessary resources to respond, conducted extensive reanalyses and responded as quickly as possible. Had these questions been raised by NRR consistent with the original agreed upon milestones, no impact on the schedule would have occurred.

In reviewing the Reservoir Reanalysis and its impact on the Environmental Engineering review, it should be noted that CP&L cancelled Units 3 and 4 at the same time the FSAR was docketed. The cancellation of these units presented unique problems in several areas, but came to light most vividly with respect to the Reservoir Reanalysis. In retrospect, the issue could have been handled better by both parties. CP&L, however, did devote a great deal of management attention and resources to this problem and was able to produce a reanalysis in as short a time as practicable. CP&L will use the lessons learned from this experience in future resolutions to NRR concerns.

Finally in reviewing CP&L's performance in the licensing area, it should be noted that the NRC changed its Project Managers for the Harris Project four times during this SALP review period, was 30 days late in issuing its first set of FSAR questions, 5 months late in issuing its last set of FSAR questions, 3 months late in issuing the Draft Safety Evaluation Report, and 6 months late in issuing the Draft Environmental Statement. Despite these schedule slippages, CP&L's licensing activities are basically on schedule. The report fails to recognize this performance by CP&L.

In summary, additional CP&L staffing and management attention will be devoted to Harris Plant licensing activities, and CP&L will take additional steps to upgrade performance in this area. Nevertheless, the current SALP Board rating of Category 3 is not justified either by the areas reviewed in the report or by reviewing the full scope of Harris Plant licensing activities, and the rating should be raised to Category 2.

9. Quality Assurance Program (SALP Board Rating: Category 2)

No Comment.

(SALP-A)

DETAILED COMMENTS CONCERNING
PERFORMANCE ANALYSIS FOR H. B. ROBINSON UNIT 21. Plant Operations (SALP Board Rating: Category 2)

No comment.

2. Radiological Controls (SALP Board Rating: Category 2)

No comment.

3. Maintenance (SALP Board Rating: Category 3)

Given the many initiatives which were undertaken during the SALP evaluation period to improve plant identified and recognized concerns in the Maintenance area, CP&L believes that a Category 2 rating is justified. Specifically:

- (1) Training (technical and management development training) of both craft persons and maintenance supervision/management, as appropriate, has been substantially increased.
- (2) New administrative/management control systems have been developed and implemented. For example, historical trending of maintenance on major pieces of equipment, expanded vibration analyses techniques, and an automated system to improve the calibration control program have all been initiated.
- (3) The Plant Maintenance Procedures are being rewritten. To date, 67 new or totally revised procedures have been developed, and approximately 64 additional revisions have been developed. This directly addresses the statement in the SALP report of "some weakness was noted in maintenance procedures adequacy."
- (4) Housekeeping standards have been substantially improved which in turn has lead to improved work area and equipment control.
- (5) Some maintenance facility changes for improved efficiency have been constructed; additional changes are planned.
- (6) Maintenance management changes and technical human resources have been approved which are and will continue to improve our technical capabilities in solving maintenance-related problems and improve our overall management control and interface with other plant organizations.

It should be additionally noted that the "surveillance" and "Refueling" areas were rated Category I, and great portions of these efforts were executed directly or supported by the plant maintenance organization.

CP&L is confident that the initiatives undertaken above and the level of management involvement and attention evident in these actions will result in continuing enhancements in this area during future SALP evaluation periods.

With the recognition of the CP&L initiatives undertaken, the effective corrective actions implemented, and the level of management involvement and attention evident in the area during the evaluation period properly noted, CP&L concurs with the Board's overall rating of Category 3.

4. Surveillance (SALP Board Rating: Category 1)

No comment.

5. Fire Protection (SALP Board Rating: Not Rated)

CP&L believes that a Category 1 rating is justified for fire protection. Several outside organizations and persons (including NRC Inspectors) have made positive comments about the Robinson Plant Fire Protection Program and Organization.

During the evaluation period, Fire Protection Technical Aides were placed on each operating shift; weekly and daily housekeeping and Fire Protection inspections were performed by the Fire Protection Technical Aides; the training in the area of Fire Protection, both for Fire Protection personnel and plant personnel, in general, has been substantially increased; and generally, problems uncovered in the Fire Protection area have been found and identified by CP&L, with appropriate corrective action implemented in order to preclude recurrence. Therefore, there has been sufficient licensee activity to justify a rating.

Although, the SALP Report stated that "there was not sufficient inspection activity in this area (Fire Protection) during the evaluation period to justify a rating" the Report also states "no violations were identified." Since the SALP Board also stated, "the level of plant fire safety was greatly improved," and the previous SALP evaluation on Fire Protection was a Category 2, it would be appropriate for the Fire Protection area to have been rated a Category 1.

6. Emergency Preparedness (SALP Board Rating: Category 2)

No comment.

7. Security and Safeguards (SALP Board Rating: Category 2)

No comment.

8. Refueling (SALP Board Rating - Category 1)

No comment.

9. Licensing Activities (SALP Board Rating - Category 3)

"Licensing Activities" has not been used as a category for evaluation in previous CP&L SALP Reports, accordingly it is difficult to

establish a benchmark for a subjective rating of licensing activities. We do not, however, believe a Category 3 rating is justified.

The Company has recognized the need for improvements in this area and has taken several positive steps to achieve improved performance. These improvements include: 1) increasing the licensing staff and providing an onsite representative to work with the Plant Regulatory Compliance Unit; 2) increasing the Plant Regulatory Compliance Unit staffing; 3) improved upfront review of licensing and submittal schedules coupled with early feedback to the NRC on schedule achievability and; 4) development of a joint CP&L/NRC Licensing Open Items List with jointly agreed upon priorities.

CP&L believes that one of the keys to better performance in this area is communications. To that end, we have conducted two recent management meetings with NRR on licensing performance and intend to meet with NRR frequently in the future. Additionally, working level meetings will continue to be held to update the initial draft of the Licensing Open Items list. The NRR has enthusiastically supported these efforts. CP&L will also be visiting those utilities rated Category 1 in licensing activities and will incorporate appropriate lessons learned into CP&L's licensing program.

Of the specific licensing activities cited by the SALP Board Report, one area deserves comment. Pressurized Thermal Shock is listed as an extended issue. CP&L has devoted substantial resources to the resolution of this issue. The Company has met all of its commitments and submittal dates with respect to this extremely complicated matter and taken a leadership position in the industry in resolving this issue. Although we believe the potential safety issue of PTS has been resolved, we are continuing to work with NRC on a joint research project to further understand the problem. The report does not recognize any of these efforts.

The Company is developing a procedure to further enhance the thoroughness and verification of licensing information. We believe this will resolve the concern regarding technical adequacy of licensing submittals.

In summary, CP&L has recognized the need for additional improvements in this area is proceeding to implement steps to achieve improved performance. A Category 2 would be a more appropriate rating at this time.

10. Quality Assurance Program (SALP Board Rating: Category 3)

Paragraph 10, Board Comments, cites a "lack of management support of the Corporate Performance Evaluation Unit" as the reason for a Category 3 rating. However, during this SALP Report period, the Corporate Quality Assurance Department strengthened and improved the Performance Evaluation Unit. Additional Quality Assurance Specialists were added, and the frequency and scope of audits at the plants were increased. Increased attention was also given to obtaining corrective action to audit findings. The status of all open items from previous audits was reviewed during each audit and the status of these items is identified in each audit report. The escalation process was added to the audit procedure in which unresolved issues are escalated to the proper level of management involvement to be resolved. This process has resulted in increased management involvement in obtaining corrective action.

We believe these actions will resolve previous concerns in the QA program.

Although CP&L acknowledges a weakness in the Performance Evaluation Unit prior to corrective action being taken during the evaluation period, CP&L believes that the Category 3 rating does not accurately reflect the performance of the plant QA/QC Unit. In 1981, Quality Assurance within CP&L was reorganized into a Corporate department. Prior to reorganization, the plant QA Unit consisted of seven personnel. After reorganization, the plant QA/QC Unit increased to 16 personnel during 1982.

With the staff additions to the plant QA/QC Unit, the unit has been assigned increased scope and responsibility. In 1981, a total of 37 surveillances were performed. In 1982, a total of 53 surveillances were performed. Continuing the increase in surveillances in 1983, 50 surveillances have been performed to date with over 100 additional planned for the remainder of this year. This represents a significant increase in plant QA/QC Unit activities. In addition, the technical capability of the plant QA/QC Unit has been improved, including the addition of a Project QA Engineer.

Substantial improvement in the scope and depth of plant QA/QC Unit activities has been evident during the evaluation period. In 1981, this area was rated Category 2. CP&L believes the plant QA/QC Unit performance should be rated Category 2.

SALP-B

DETAILED COMMENTS CONCERNING
PERFORMANCE ANALYSIS FOR BRUNSWICK UNITS 1 AND 2

1. Plant Operations (SALP Board Rating: Category 3)

While we understand the SALP Board rating, many of CP&L's improvements, accomplished and underway, occurred near the end of the evaluation period and are not reflected in the report. These improvements are directed toward enhanced management involvement, improved procedures, and enhanced communications.

Management involvement in the operations of the Brunswick Plant have been significantly enhanced through several organizational changes. The most significant was the consolidation of all engineering, construction, and operations functions at the Brunswick Plant under a Vice President located at the Brunswick Plant site. Within the plant organization itself other significant organizational improvements have been implemented, which we believe will be effective in ensuring an adequate level of management involvement at all levels of the organization. Some of the more significant changes are:

1. The Director of Planning and Scheduling now reports to the Vice President - Brunswick Nuclear Project to provide more effective integration of site planning and scheduling activities.
2. The position of Manager - Technical and Administrative Services, reporting to the Plant General Manager has been created. Management of the Technical and Administrative Support functions will be consolidated under this position to relieve the Plant General Manager of direct management of these organizations.
3. The Director - Regulatory Compliance now reports to the Plant General Manager and the Regulatory Compliance Unit has been increased from 6 to 11 members.
4. Additional positions have been added to the Operations organization to increase technical support and training support.

We believe that these changes and others made or planned will significantly enhance the level of management involvement in Plant Operations, promote greater thoroughness and depth of analysis directed at resolution of technical and operational issues, and provide increased attention to the monitoring, tracking, and closing of regulatory issues.

The operations procedures are being rewritten as part of the Brunswick Improvement Program, which will eliminate poorly stated or ill understood procedures. We anticipate that this effort will be completed by the end of 1983. Plant and corporate management are closely monitoring the progress of this effort.

With respect to communications, there has been a significant emphasis on the importance of communications at all levels in the

organizations. For operators, the most significant enhancement in communications was the establishment of monthly meetings with the operating shifts conducted by the Vice President - Brunswick Nuclear Project and the Plant General Manager. These management personnel meet on a monthly basis with the Operations staff and with the Shift Operating Supervisors. These meetings provide an excellent opportunity for free and open exchange of ideas, concerns, plans, problems, and needs of the operating personnel. We believe that these meetings have been effective in improving communication channels within the operating organization.

An important aspect of our improved communication efforts at BSEP has been increased emphasis on discipline of operations and adherence to procedures. This concern has been, and continues to be, emphasized in training sessions as well as during meetings such as those held with the operating staffs.

2. Radiation Protection, Radioactive Waste Management and Transportation
(SALP Board Rating: Category 2)

We are pleased to note that the SALP Board has recognized an improvement in this area from Category 3 last period, to a Category 2 during this period. We believe, however, that the progress made in the radiation protection, radioactive waste management and transportation areas has been more significant than indicated in the SALP Board Report, and that a Category 1 rating is justified.

The SALP Board recognizes that the volume of solid waste generated during 1982 has decreased as compared to previous years, however the report notes that the waste volume is still higher than that generated by other similar facilities in the region. Over the past two years, extensive efforts have been made to reduce the volume of solid waste, while supporting substantial outage activities. These efforts have been effective. For example, the number of cubic feet of waste shipped in 1981 was 34% below shipments in 1980. 1982 shipments reflected an additional 22% reduction from the 1981 levels. This is more than a 50% reduction in just two years.

During this period we have also continued our extensive program of maintenance and modification programs for achieving further improvements in the radwaste area by upgrading and replacing components and adding new equipment. These efforts will improve the operation of this facility and reduce inleakage into the radwaste system. As a measure of our success, inleakage into the radwaste system has been decreased from an average of 95 gallons per minute in 1981 to an average of 76 gallons per minute in 1982. During the first 5 months of 1983, this level was further reduced to an average of 55 gallons per minute.

The Brunswick Steam Electric Plant has also increased its Radiological and Chemistry Staff from 36 people in 1979 to 135 in 1983. As a result, the experience level of this Staff has increased, supplemented by improved training programs for Health Physics personnel and for all employees. In addition, radwaste management was upgraded early in 1981 by permanently assigning people to the radwaste system. These personnel have no other responsibilities.

As a result of the above efforts, violations in the Radwaste and Environmental areas have decreased from 23 during the previous SALP review period to only 4 resulting from eight regional inspections during the 1982 SALP review period. This demonstrates that a Category 1 rating is justified.

3. Maintenance (SALP Board Rating: Category 3)

In recognition of the need to improve the maintenance program at the Brunswick Plant, CP&L began a maintenance improvement initiative in late 1980. This initiative has continued since that time and we believe that the maintenance improvement efforts are proceeding in a manner that will resolve the concerns identified in the SALP Report.

In July of 1981, the plant maintenance organization was restructured to: 1) provide more specific area responsibility of the maintenance staff, 2) increase engineering, supervisory and crafts support, and 3) increase the foremen-to-crafts ratio. Following this restructuring and in order to facilitate the increase in staff and improve the expertise of maintenance craft personnel at Brunswick, over 30 mechanical maintenance craft personnel were transferred from our fossil plants to Brunswick.

In addition, Mr. Mendall Long, Vice President - Special Projects, was assigned to the Brunswick Plant in mid 1981 as an on-site maintenance and operations consultant to plant management. Mr. Long possesses over 30 years of CP&L experience in power plant operation, maintenance, and engineering and has been working at the plant site since his assignment there to provide advice and guidance to the maintenance and the operations organizations on effecting program improvements.

Additional resources for the maintenance organization were approved in early 1983. Significant additions were:

1. Three Training Specialist positions have been added to the maintenance technical staff. These personnel will be responsible for the development of the training programs and lesson plans, coordination of training, and development of materials needed to conduct classroom training sessions for maintenance personnel.
2. The number of engineering positions in the maintenance organization has been increased from two to ten, and we will fill these positions as soon as possible.

In addition to the staff increases, the Maintenance Management System was implemented at the Brunswick Plant in 1981. Since its implementation, progress on expansion of the program has continued to be emphasized and good progress is being made.

A significant expansion of the Preventative Maintenance Program was initiated in early 1982. This expansion effort continued on a priority basis during 1982 and the near term objectives of the expansion of this program are scheduled to be completed by the end of 1983. Additional long-term enhancements of the PM Program are also scheduled for completion during 1984 and 1985.

For the above reasons, CP&L is confident that the maintenance program at Brunswick Plant has improved significantly and will be further improved in the future.

4. Surveillance and In-Service Testing (SALP Board Rating: Category 3)

Carolina Power & Light Company recognizes the programmatic breakdowns that contributed to the overall rating in this category. We do not believe, however, that the SALP Board's "Analysis" Section provides an accurate reflection of the management involvement and management commitment to ensuring that improvements in this area are achieved. The SALP Report references the fact that 38 separate instances of reportable technical specification noncompliances were identified in this area. It should be noted that the majority of these noncompliances were identified by CP&L as the result of an unprecedented self-evaluation of the plant's surveillance and inservice testing programs.

Carolina Power & Light Company has conducted a massive upgrade and expansion of the Brunswick Inservice inspection program over the past 12 months in the following areas:

1. Establishment of a visual test program;
2. Inspection of Class II welds;
3. Reverification and redesignation of ASME boundary;
4. Establishment of clearly defined post-maintenance testing;
5. Re-evaluation of all containment isolation valves and establishment of a master containment isolation valve table;
6. Total upgrade of the integrated leak rate/local leak rate testing program.

We believe that the scope of the review effort initiated by CP&L during the summer of 1982 is unparalleled within the nuclear industry. We also believe that this program went well beyond the requirements of the NRC Confirmatory Action Letters of July 2, 1982, and July 20, 1982.

The SALP Report addresses a Commission Order requiring implementation of the Brunswick Improvement Program. We believe that the SALP Report as written is subject to misinterpretation in that it does not acknowledge that the Brunswick Improvement Program was voluntarily developed by CP&L and provided to the NRC prior to the receipt of the Commission Order. In essence, the Commission Order simply mandated actions that CP&L already had underway.

In summary, CP&L believes that actions underway will resolve the problems identified.

5. Fire Protection (SALP Board Rating: Category 3)

Carolina Power & Light Company recognizes that improvements are needed in this area and has implemented corrective actions as follows:

1. The fire protection subgroup's manpower for routine inspections have been augmented with experienced operators.

2. A formal training program for fire protection personnel has been developed and is now being implemented.
3. A total review of the Brunswick fire protection program was conducted by an outside group which endorsed the actions being taken and made additional recommendations which are currently being reviewed for appropriate implementation.
4. A change in plant procedures now requires a daily review of fire protection limiting conditions for operation.

Carolina Power & Light Company believes that implementation of the above corrective actions will resolve the Brunswick fire protection concerns.

6. Emergency Preparedness (SALP Board Rating: Category 1)
No Comment

7. Security and Safeguards (SALP Board Rating: Category 1)
No Comment

8. Refueling (SALP Board Rating: Category 3)

The SALP Board cited poorly stated and ill understood procedures and lack of adequate management involvement in refueling operations. Carolina Power & Light Company has initiated corrective actions to address these concerns.

The fuel handling procedures have been rewritten and the general operating procedures have been the subject of an intense review. Changes made to the fuel handling procedures will prevent change of reactor mode without careful consideration of prerequisites necessary to enter a new mode.

Also, management control has been increased to ensure that fuel is not moved when any control rod is withdrawn from the core. Additional changes to the procedure provides further control as follows:

1. Verification of control rods prior to loading fuel into the cell is required.
2. Fuel movement sheets must have the concurrence of the SRO.
3. All procedures have been updated to prohibit fuel movement with any control rods withdrawn.
4. Instructions have been added to the procedure on how to prepare fuel movement sheets and ensure that technical specification requirements and independent verification requirements are considered in the refueling report.

CP&L believes these corrective actions will resolve the concerns noted.

9. Licensing Activities (SALP Board Rating: Category 3)

Paragraph 9.a. "Analysis" includes the statement, "No improvement was noted in this area since the last SALP evaluation." However, "Licensing Activities" was not a category in previous SALP Reports, and there was no NRR

management comment or communication with CP&L regarding NRR's observations in this area during the 1982 SALP review period.

CP&L has recognized the need for improvement in this area and has taken several positive steps to bring about that improvement. These steps include: 1) increasing the licensing staff in the General Office; 2) increasing the staffing of the plant Regulatory Compliance Unit from 6 to 11 positions; 3) changing the reporting responsibilities of the Director, Regulatory Compliance such that he reports directly to the Plant General Manager and; 4) working toward the development of an integrated 5-year plan with respect to regulatory requirements.

We are confident that these steps will produce positive results and an improved level of performance in the areas of responsiveness, thoroughness, and technical soundness of our submittals to NRR.

CP&L has recognized the need for additional communication with NRR, and intends to conduct frequent meetings both on the working and management level to discuss licensing open items and the current level of performance. CP&L has been working with NRR to develop a NRC/CP&L Licensing Open Items List which will include jointly agreed upon priorities and response dates. Two management meetings between CP&L and NRC already occurred concerning this concept and working level meetings are scheduled in the near future.

Specifically, in its analysis of licensing activities, the SALP Board cites the following eight areas as its basis for its evaluation:

- Project Management Administration
- NUREG-0737 Items
- Appendix R
- Environmental Qualification (EQ)
- RPS Power Supply
- Operator Licensing
- Spent Fuel Storage Increase
- Radiological Effluent Technical Specifications (RETS)

In reviewing these areas, CP&L feels that it was very responsive with respect to RETS, Spent Fuel Storage Increase, RPS Power Supply, and Environmental Qualification. The RETS submittal in particular has been highly praised within NRC, and CP&L has met its commitment in the areas of Spent Fuel, RPS Power Supply and EQ.

With regard to NUREG-0737 items, CP&L has, for selected items, found it necessary to delay implementation due to priority changes, design problems and construction difficulties. The Company also believes that the experience of the industry with NUREG-0737 items is similar to that of CP&L's experience.

In reviewing CP&L's response to Appendix R, in retrospect the issue could have been handled better by both CP&L and NRC. Brunswick presented a unique case in that it had a completely approved Safety Evaluation Report (SER) for Fire Protection, portions of which were invalidated by the issuance of Appendix R. In light of this reversal of NRC policy, CP&L's initial efforts were to assess in which areas the previous SER was now invalid and what legal and licensing actions were appropriate. Some delays in initially