

# PRIORITY 2

NUDOCS OFFSITE FACILITY)  
REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9411170054      DOC. DATE: 94/11/02      NOTARIZED: NO      DOCKET #  
FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C      05000261  
50-324 Brunswick Steam Electric Plant, Unit 2, Carolina Powe      05000324  
50-325 Brunswick Steam Electric Plant, Unit 1, Carolina Powe      05000325  
50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina      05000400

AUTH. NAME      AUTHOR AFFILIATION  
ROGAN, R.E.      Carolina Power & Light Co.  
RECIP. NAME      RECIPIENT AFFILIATION  
Rules & Directives Review Branch (Post 920323)

SUBJECT: Comment on pilot program for NRC recognition of good performance by Nuclear Power Plants. Util endorses position stated in Nuclear Energy Institute 941003 ltr to NRC for listed reasons.

DISTRIBUTION CODE: DS09D      COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2  
TITLE: SECY/DSB Dist: Public Comment on Proposed Rule (PR)-Misc Notice; Reg G

NOTES: Application for permit renewal filed.      05000400

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
INTERNAL: <u>FILE CENTER 01</u>	1	NMSS/IMOB T8F5	1
OGC/DR 15-B-18	1	RES DIR	1
RES/DSIR	1	RES/PMPDAS	1
EXTERNAL: NRC PDR      02	1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR      7      ENCL

P  
R  
I  
O  
R  
I  
T  
Y  
  
2  
  
D  
O  
C  
U  
M  
E  
N  
T

0

ER



Carolina Power & Light Company  
PO Box 1551  
411 Fayetteville Street Mall  
Raleigh NC 27602

RECEIVED

1994 NOV 15 AM 10:54  
RULES REVIEW & DIR. BR.  
USNRC

M. Markley  
59FR45315  
9/11/94  
(8)

November 2, 1994

File: X-X-1075  
X-X-0546

Serial: NL&RAS-94-093

The Chief, Rules Review and Directives Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Reference: Notice of Request for Comment on Pilot Program for NRC Recognition of Good Performance by Nuclear Power Plants, 59 Fed. Reg. 45315, September 1, 1994

Dear Sir:

By the referenced notice (59FR45315), the NRC requested comment on the Pilot Program for NRC Recognition of Good Performance by Nuclear Power Plants. Carolina Power & Light Company (CP&L) appreciates the opportunity to comment on the NRC's effort to programmatically recognize good safety performance in much the same manner as it cites inadequate safety performance. Recognition of good performance can have a positive impact. However, CP&L endorses the position stated in the Nuclear Energy Institute (NEI) letter to the NRC, dated October 3, 1994, for the following reasons:

- o It is inappropriate for the NRC to promote a standard of performance (excellence) beyond that level adequate to assure public health and safety; and
- o Criteria selection for good performance is wholly subjective and could result in an overall adverse impact upon the industry.

If NRC recognition of good safety performance is deemed appropriate, it can be effected in a beneficial way by using established evaluation/assessment programs, such as the SALP, which clearly provides the NRC view of safety performance at each plant.

9411170054 941102  
PDR ADOCK 05000261  
P PDR

November 2, 1994

CP&L concurs with the NEI conclusion that the NRC should regulate for compliance, and the industry should manage for excellence. Promotion of excellence beyond the current regulatory standard may have a significant cost impact on a utility. This is particularly true if the subjective criteria which govern selection of plants for the Good Performer Program are subjected to a steadily increasing "standard" of what constitutes good performance. This escalation could evolve into higher NRC inspection standards without a concomitant increase in plant safety. This additional cost would be unwarranted.

If you require additional information, please contact me at (919) 546-6901 or Mr. Fred Emerson (Director, NEI Regulatory and INPO Affairs) at (919) 546-7573.

Sincerely,



R. E. Rogan

Manager

Nuclear Licensing and Regulatory Affairs

FAE/ebc

c: Mr. S. H. Callis  
Mr. F. A. Emerson  
Ms. S. F. Flynn  
Mr. H. W. Habermeyer, Jr.  
Mr. K. R. Jury  
Ms. P. D. Morris  
Mr. W. H. Rasin (NEI)  
Mr. L. S. Rowell