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SUBJECT: Notifies NRC in delay of individual plant exam submittal, per 891031 response to Generic Ltr 88-20. Submittal delayed for 1 yr until Aug 1993.

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NOTES: Application for permit renewal filed. 05000400

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G. E. VAUGHN
Vice President
Nuclear Services Department

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62

REQUEST FOR DELAY OF INDIVIDUAL PLANT EXAMINATION (IPE) SUBMITTAL

Gentlemen:

On August 29, 1989, the NRC issued Supplement 1 to Generic Letter 88-20 requesting licensees to submit their proposed programs and schedules for completing Individual Plant Examinations (IPE). Carolina Power & Light Company (CP&L) responded to the NRC request on October 31, 1989 and committed to an IPE submittal date to the NRC of August 1992 for each of the CP&L units. At the time of our response, CP&L was confident of its ability to meet this schedule based upon the current staffing level and previous experience in performing Level I PRA work for the Brunswick Steam Electric Plant (BSEP) and the Shearon Harris Nuclear Power Plant (SHNPP). The purpose of this letter is to notify the NRC of a delay in CP&L's currently committed schedule for submittal of the IPE for SHNPP based upon conditions which have changed since our October 1989 response.

As the PRA effort proceeded during late 1989 and early 1990, it became clear that the amount of effort needed to perform comprehensive and valid front-end analyses had been underestimated. Other utilities with several nuclear units and multiple sites have had similar experiences. To compensate for this, CP&L increased its use of outside contractors in order to maintain the committed schedule. During the past year, CP&L has lost some key individuals who were involved in the performance of the IPEs, and our efforts to replace this expertise by active recruiting have been unsuccessful. Several options have been evaluated to address these recent losses. CP&L concluded that while internal transfer and training of personnel is preferred, this cannot be completed in time to meet the existing schedule. While an increase in contract personnel could be made, the ratio of outside contractors to internal resources would be prohibitively high. CP&L wishes to retain the knowledge gained during the performance of the IPEs so that the models can be utilized for risk management after the IPE effort is complete. Further, Generic Letter 88-20 specifically states that utilities should maximize the use of internal resources to complete the IPEs so that the insights gained and the methodology learned can be retained by the utility. A further increase in contractor resources would be contrary to this. A third alternative, submittal of abbreviated IPEs, was deemed unacceptable as it would

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be contrary to CP&L's intent to provide realistic assessments of potential vulnerabilities at its plants. CP&L believes that the IPEs are worthwhile and therefore should be completed in a comprehensive manner.

Therefore, CP&L hereby revises the IPE submittal schedule for SHNPP. We intend to delay the SHNPP IPE by one year (revised submittal date of August 1993). Resources will be shifted to the HBR2 and BSEP IPEs as needed to meet their original submittal dates of August 1992. SHNPP has been chosen for this delay since it is a recently constructed plant which was reviewed and licensed to Standard Review Plan and 10 CFR 50, Appendix R requirements. Additionally, preliminary Level I results for SHNPP indicate a relatively low estimated core damage frequency and no potential significant vulnerabilities. Therefore, a delay of the SHNPP IPE would result in the least risk of an undetected vulnerability to severe accidents.

Due to the need to act expeditiously, CP&L is proceeding to implement the course of action described above. If you have any questions concerning this information, please contact Mr. L. S. Rowell at (919) 546-2770.

Yours very truly,



G. E. Vaughn

LSR/jbw (1038GLU)

cc: Mr. R. A. Becker
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