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 AUTH.NAME AUTHOR AFFILIATION  
 UTLEY,E.E. Carolina Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 GRACE,J.N. Region 2, Ofc of the Director

SUBJECT: Summarizes corporate mgt oversight team activities,current & planned.

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E. E. UTLEY  
Senior Executive Vice President  
Power Supply and Engineering & Construction

July 29, 1988

Dr. J. N. Grace  
Regional Administrator  
USNRC  
Suite 2900  
101 Marietta St., NW  
Atlanta, Georgia 30323

Dear Dr. Grace:

In accordance with my letter to the US Nuclear Regulatory Commission dated July 18, 1988, file: B09-13510C, serial: BSEP/88-0732, following is a summary statement of our activities, current and planned, related to the issues and concerns raised at our Brunswick Steam Electric Plant (BSEP):

1. Actions to Date

A Corporate Management Oversight Team (CMOT) has been established with Mr. R. B. Starkey, Jr., Manager - Nuclear Safety & Environmental Services Department as the team leader. This team is composed of four well-qualified, nuclear-experienced CP&L employees who are not members of the Brunswick Plant organization along with the Director of On-Site Nuclear Safety (ONS) at Brunswick (who is a member of Mr. Starkey's department). This six-person team, assembled on site on July 21, 1988, is assembling data for evaluation and is providing 24-hour-a-day observation of various plant activities. The team members have been formally trained in observation and data evaluation techniques by the ONS Director from the Harris Plant, who is a qualified INPO team leader, and who is also a manager in Mr. Starkey's department. The data being assembled relates to past and present plant activities (e.g., LER data, INPO observations, NRC violations, direct input from one-on-one interviews and observations of plant activities, etc.). The team is also interfacing directly with management at all levels throughout the plant. In addition, a qualified INPO team leader with extensive prior Boiling Water Reactor plant experience was sent by INPO to the site for three days to provide additional input and insight into the efforts performed by the CMOT.

Also, as previously reported, Mr. J. L. Harness, who has extensive nuclear management experience with another Company and at all three CP&L nuclear sites, has assumed the position of Plant General Manager at the Brunswick site.

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## 2. Short-Term Actions

The CMOT will continue for four more weeks to enhance the quality of review. The scope and objectives of this team include observation of current events and a critical review of past and present performance indicators to make an initial assessment of the root causes of the concerns noted in my letter of July 18, 1988, so appropriate feedback and initial recommendations can be made to plant and corporate management. By August 26, 1988, it is anticipated that the CMOT will have completed its observations, made an assessment of the results, and presented conclusions to appropriate plant and corporate management for follow-up corrective action as necessary.

In addition to the activities of the CMOT, we will be completing the hardware evaluation and review activities consistent with the dates provided in my letter of July 18, 1988. The design evaluation of BSEP safety-related, motor-operated valves has specifically been assigned as a special project to Mr. John O'Sullivan, the former Maintenance Manager at BSEP. Because of the significance of this project, Mr. O'Sullivan will report directly to the Brunswick site Project Vice President.

In parallel with the above-noted activities plant management and corporate management will develop a "Long-Term Corporate and Plant Management Appraisal Program Plan." Development of this plan is scheduled for completion by September 1, 1988. This plan will address the appraisal team scope, objectives, organization, schedule, methodology, and process. It will take into account current industry initiatives and input and will be developed with the help of outside expertise with appropriate qualifications and experience.

## 3. Long-Term Actions

Implementation of the "Long-Term Corporate and Plant Management Appraisal Program Plan" for the Brunswick Plant will be started in September 1988. We expect the Brunswick Plant Management Appraisal to be comprehensive and include corporate and site management. Its objectives will include:

- a. Management awareness of problems and employee concerns.
- b. Effectiveness of management programs to detect potential problems.
- c. Effectiveness of corrective action programs.
- d. Adequacy of root cause analysis.
- e. Communication adequacy and flow.
- f. The process by which plant goals are established, communicated, measured, and achieved.
- g. The level of supervisory attention, leadership and presence at work stations, in day-to-day and long-term plant activities.

- h. The adequacy and effectiveness of resource allocations.
- i. Effectiveness of the interaction between plant management and line and staff organizations on-site and those off-site which directly support plant activities.

This management appraisal will be an outside evaluation and will utilize the current short-term assessment activities now in progress by the CMOT as an additional source of inputs. It will provide for corrective action recommendations and follow-up.

We plan to perform a management appraisal also at the Robinson Plant.

We will also take advantage of lessons learned at the Harris Plant.

The above plans and schedules were developed consistent with our intent to allow sufficient time to assure quality results in both the short- and long-term. During the conduct of these activities, voluntarily, be assured that as licensee responsible for the operation of the plant, we will continue to exercise such other management actions and initiatives as may be deemed necessary and appropriate to carry out our responsibilities.

We view these actions as voluntary and consistent with initiatives started early in the year.

Very truly yours,

  
E. E. Utley

EEU/tcv (NRC)