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 AUTH.NAME AUTHOR AFFILIATION
 ZIMMERMAN,S.R. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 THOMPSON,H.L. Division of Licensing

SUBJECT: Forwards response to Generic Ltr 85-07, "Implementation of Integrated Schedules for Plant Mods," per 850502 request. Comments on living schedule concept also encl.

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Carolina Power & Light Company
JUL 03 1985

SERIAL: NLS-85-227

Mr. Hugh L. Thompson, Jr. Director
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

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

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

RESPONSE TO GENERIC LETTER 85-07
IMPLEMENTATION OF INTEGRATED SCHEDULES FOR PLANT MODIFICATIONS

Dear Mr. Thompson:

In your letter dated May 2, 1985, Carolina Power & Light Company (CP&L) was requested to provide review of the Integrated Living Schedule Concept. In particular, we were requested to discuss our intentions for our operating reactors and any additional concerns that CP&L would want the NRC staff to consider.

Attachment 1 provides our responses for the Brunswick and Robinson Plants in the format requested. Attachment 2 provides additional CP&L comments on the Integrated Living Schedule Concept.

Should you have any questions concerning this letter, please contact Mr. Patrick Carier at (919) 836-8165.

Yours very truly,

S. R. Zimmerman
Manager
Nuclear Licensing Section

SRZ/PPC/crs (1650PPC)

Attachments

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. W. H. Ruland (NRC-BNP)
Mr. G. Requa (NRC)
Mr. M. Grotenhuis (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)

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ATTACHMENT 1
RESPONSES TO ENCLOSURE 2 QUESTIONNAIRE

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85- 07

PLANT NAME: Brunswick Steam Electric Plant, Units 1 &2

UTILITY: Carolina Power & Light Company

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS X
- B. Have reservations that must be resolved before developing ILS
- C. Do not presently intend to negotiate an ILS with the staff
- D. Plan to implement an informal ILS only

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement	<u>X</u>
Analytic Hierarchy process	<u>X</u>
Risk based analysis	<u> </u>
Cost-benefit analysis	<u>X</u>
Other (please describe)	<u> </u>

If no, provide estimated date for selecting a methodology:

 Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology:

2. What is your estimated date for making a submittal to the NRC- *

or

If not presently available, planned date for scheduling a submittal to the NRC

* Request for License Amendment (Long-term planning) was submitted on April 29, 1985.

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame N/A

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact N/A

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

(See Attachment 2)

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: H. B. Robinson, Unit No. 2

UTILITY: Carolina Power and Light Company

I. INTENTIONS

A. Intend to work with the staff to develop an ILS _____

B. Have reservations that must be resolved before developing ILS _____

C. Do not presently intend to negotiate an ILS with the staff _____

X (See Attached Sheet)

D. Plan to implement an informal ILS only _____

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____

Analytic Hierarchy process _____

Risk based analysis _____

Cost-benefit analysis _____

Other (please describe) _____

If no, provide estimated date for selecting a methodology: _____

Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: _____

2. What is your estimated date for making a submittal to the NRC- _____

or

If not presently available, planned date for scheduling a submittal to the NRC _____

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One:

Yes

No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact , _____ Mr. S. D. Floyd

Time Frame _____ August, 1985

Phone Number _____ 919-836-6901

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

(See Attachment 2)

ROBINSON INTENTIONS

Carolina Power & Light Company is actively pursuing an Integrated Living Schedule (ILS) for the Brunswick Nuclear Project (Request for License Amendment submitted April 29, 1985). However, in the case of Robinson Nuclear Plant (RNP), most of major long-term regulatory backlog has been completed; therefore, there would be little benefit from a formal CP&L/NRC ILS process.

The Robinson Nuclear Project is in the process of implementing an integrated approach to Outage Planning, Long-Range Planning, and Business Planning. These programs, however, are intended as internal management tools.

RNP is available to share with the NRC on an annual or more frequent basis its plans for the next three to five years, either in the form of a presentation or a submittal. RNP, however, does not intend to request that these plans be referenced in an amendment to the Operating License.

ATTACHMENT 2

**ADDITIONAL COMMENTS CONCERNING THE
INTEGRATED LIVING SCHEDULE CONCEPT**

ADDITIONAL COMMENTS

CP&L is providing the following remarks in the belief that they may prove to be useful in the NRC's role in the development of an Integrated Living Schedule at other utilities. We respectfully submit these remarks as "constructive comments," and we hope they are accepted as such.

1. Per Enclosure 1 to Generic Letter 85-07, "It should be clear that the regulatory intent of the license amendment is to provide assurance that NRC required activities are scheduled and completed at the plant consistent with an optimum utilization of resources under the constraints applicable to the specific licensee." CP&L agrees with that principle. The intent of the Integrated Living Schedule concept and its associated prioritization methodology is for each plant to create a schedule that is achievable and that is based on a realistic assessment of the relative priorities of its planned modifications. Integration of NRC-mandated dates could require excessive outage lengths and unrealistic manpower requirements; a situation such as this would not be in the utility's nor in the public's best interest. The initial submittal of a plant's NRC implementation schedules should reflect that plant's assessment of what is physically achievable and economically feasible, and this submittal can be used in the negotiation process with the NRC.
2. The stated objectives of the ILS Program appear well intentioned. The ILS Program, however, represents the entrance of the NRC into an area; i.e., the utility's planning process, that has not previously been subject to their jurisdiction. Utilities utilize a wide array of methods to analyze, prioritize, and schedule projects. Additionally, based on the vendor and vintage of the plant, utilities face varying degrees of difficulty in implementing regulatory requirements. Unavoidably, the NRC will be faced with a myriad of different methodologies to administer and inspect. The inevitable next step is questions of "Why don't you do it like _____?" and standardization of methodologies might be proposed. CP&L urges the NRC to remain flexible in the review and concurrence of different methodologies that meet individual licensee's needs.
3. For a plant with a small regulatory backlog, there appears to be few advantages to the ILS Program. For these plants, the objective of planned refueling outages is to limit the length of the outage to the generic refueling critical path and complete other projects which can be conducted in parallel with the refueling critical path.