



Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

APR 15 1993

H. W. HABERMEYER, JR.
Vice President
Nuclear Services Department

SERIAL: NLS-93-105
10 CFR 50.90

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
TERMINATION OF BRUNSWICK IMPROVEMENT PROGRAM
(TAC NOS. M82248 AND M82249)

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to Operating Licenses DPR-71 and DPR-62 for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2.

On December 22, 1982, the NRC issued Confirmatory Order EA-82-106, which required implementation of the "Brunswick Improvement Program" (BIP). The actions recommended in the BIP have been implemented. Accordingly, the Company has met the requirements of Confirmatory Order EA-82-106. Because the Brunswick Unit Nos. 1 and 2 Operating Licenses were amended pursuant to 10 CFR 50.54(h) to make them subject to Confirmatory Order EA-82-106, the Company is requesting amendment of the licenses to terminate the requirements of the Confirmatory Order.

The commitments identified in the CP&L Corporate Improvement Initiatives and in the Brunswick Three-Year Plan fully address the root causes of contemporary performance concerns and issues at the Brunswick Plant. CP&L has established appropriate management and programmatic controls to ensure that these activities are effectively implemented and will continue to monitor performance closely to ensure long-lasting improvement. CP&L has committed, in our letter of December 15, 1992, which transmitted the Three-Year Plan to the NRC, and in public meetings with the NRC, to meet periodically with the NRC on a mutually agreeable schedule to report on the status of our implementation of the Brunswick Three-Year Plan. CP&L believes that these periodic status meetings will provide the most effective vehicle for the NRC to monitor and affirm the improvement that the Brunswick Plant is making in all phases of its operations.

On November 27, 1991, CP&L submitted a license amendment request (Serial: NLS-91-292) similar to this request, except that the previous request referenced the Integrated Action Plan (IAP). Because the Brunswick Three-Year Plan supersedes the IAP, CP&L hereby withdraws that request.

Enclosure 1 provides the basis for the proposed change.

Enclosure 2 details the basis for the Company's determination that the proposed change does not involve a significant hazards consideration.

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Enclosure 3 provides an environmental evaluation that demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with issuance of the amendment.

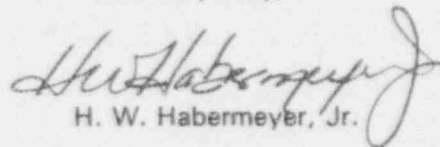
Enclosure 4 provides a status summary of the individual BIP items.

Attachment 1 provides a list of the documents referenced in the amendment request.

Carolina Power & Light Company is providing, in accordance with 10 CFR 50.91(b), Mr. Dayne H. Brown of the State of North Carolina with a copy of the proposed license amendment.

Please refer any questions regarding this submittal to Mr. D. B. Waters at (919) 546-3678.

Yours very truly,


H. W. Habermeyer, Jr.

DEW/kah (nls93105.wpf)

Attachment:

1. List of Documents Referenced in the Amendment Request

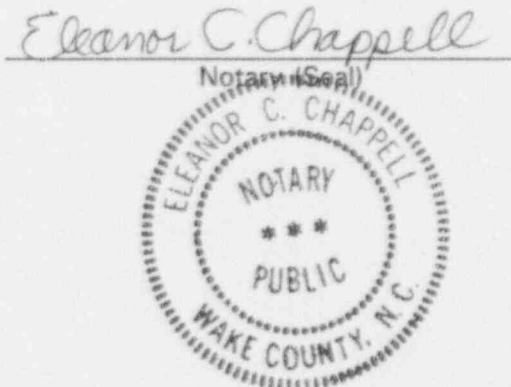
Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. BIP Item Status Summary

H. W. Habermeyer, Jr., having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

My commission expires: 2/6/96

cc: Mr. Dayne H. Brown
Mr. S. D. Ebnetter
Mr. P. D. Milano
Mr. R. L. Prevatte



ATTACHMENT 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
TERMINATION OF "BRUNSWICK IMPROVEMENT PROGRAM"

LIST OF DOCUMENTS REFERENCED IN THE AMENDMENT REQUEST

1. Confirmatory Order: EA-82-106 (Reference Report Nos. 50-324/82-28 and 50-325/82-28), December 22, 1982.
2. NLS-91-292, Request for License Amendment, Termination of Brunswick Improvement Program, November 27, 1991.
3. CP&L Letter (Utley to O'Reilly), Implementation Plan for the Brunswick Improvement Plan, October 29, 1982.
4. Confirmatory Order EA-82-106, Brunswick Units 1 and 2, Docket Nos. 50-325 and 50-324, April 3, 1984.
5. NLS-86-166, Brunswick Improvement Program - Final Six-Month Status, May 30, 1986.
6. NRC Inspection Report Nos. 50-325/89-20 and 50-324/89-20, September 22, 1989.
7. NRC Diagnostic Evaluation Team Report for the Brunswick Steam Electric Plant, August 2, 1989.
8. NLS-89-265, Response to NRC Diagnostic Evaluation Team Report, September 27, 1989.
9. NRC Inspection Report Nos. 50-325/89-34 and 50-324/89-34, November 30, 1989.
10. BSEP 92-0051, Brunswick Nuclear Plant Three-Year Plan, Revision 0, December 15, 1992.
11. NLS-87-188, Brunswick Improvement Program, October 26, 1987.
12. NRC Inspection Report Nos. 50-325/90-31 and 50-324/90-31, August 27, 1990.
13. NRC Inspection Report Nos. 50-325/91-27 and 50-324/91-27, November 8, 1991.
14. NRC Inspection Report Nos. 50-325/91-11 and 50-324/91-11, April 16, 1991.
15. NRC Inspection Report Nos. 50-325/90-32 and 50-324/90-32, October 18, 1990.
16. NRC Inspection Report Nos. 50-325/92-07 and 50-324/92-07, April 24, 1992.
17. Licensee Event Report (LER) 1-89-016, Supplement 1, November 1, 1989.

18. NRC Inspection Report Nos. 50-325/92-39 and 50-324/92-39, November 20, 1992.
19. NRC Inspection Report Nos. 50-325/92-04 and 50-324/92-04, July 17, 1992.
20. NRC Inspection Report Nos. 50-325/90-37 and 50-324/90-37, October 18, 1990.
21. NRC Inspection Report Nos. 50-325/92-10 and 50-324/92-10, April 29, 1992.
22. NRC Inspection Report Nos. 50-325/90-16 and 50-324/90-16, May 2, 1990.
23. NRC Inspection Report Nos. 50-325/90-39 and 50-324/90-39, October 5, 1990.
24. NRC Inspection Report Nos. 50-325/92-12 and 50-324/92-12, May 27, 1992.

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
TERMINATION OF "BRUNSWICK IMPROVEMENT PROGRAM"

BASIS FOR CHANGE REQUEST

Proposed Change

On December 22, 1982, the NRC issued Confirmatory Order EA-82-106, which required implementation of the "Brunswick Improvement Program" (BIP). The actions recommended in the BIP have been implemented. Accordingly, CP&L has met the requirements of Confirmatory Order EA-82-106. Because the Brunswick Units 1 and 2 operating licenses were amended pursuant to 10 CFR 50.54(h) to make them subject to Confirmatory Order EA-82-106, the Company is requesting license amendments to terminate the requirements of the Confirmatory Order.

Basis

On October 29, 1982, CP&L submitted the Brunswick Improvement Program (BIP) to the NRC for review. The BIP was a comprehensive program designed to consolidate and facilitate efforts to implement improvements at the Brunswick Plant. The BIP specified 134 detailed tasks, including actions such as filling a Senior Specialist position; 100 percent Quality Assurance review of Technical Specification requirements every three years; and reviewing and implementing, as appropriate, each of the 167 recommendations that resulted from Management Analysis Company's review of CP&L's Corporate Quality Assurance Program. The NRC subsequently placed the BIP under a Confirmatory Order, on December 22, 1982, which formalized CP&L's commitment to the program. In accordance with its original schedule, the program was essentially completed as of December 31, 1983. In a letter dated April 3, 1984, the NRC's Regional Administrator stated that the NRC had "inspected each task action item in the BIP and found that CP&L had satisfied the requirements imposed by Confirmatory Order EA-82-106." The letter also requested CP&L to provide a periodic status report on those BIP actions that were "closed out due to being implemented, but will continue in an ongoing status." These status reports were provided by CP&L until May 30, 1986, when the final status report was submitted.

The attached table, entitled "BIP Item Status Summary", provides a description of each individual BIP item and status.

NRC Inspection Report Nos. 50-325/89-20 and 50-324/89-20, dated September 22, 1989, documents the results of an inspection to determine if the long-term BIP items, intended to assure continued improvement, were in place. This report also correlated BIP items with the findings of the NRC Diagnostic Evaluation Team (DET) inspection dated August 2, 1989. For each of the long-term BIP items, the inspection report found that either the objective of the BIP item continued to be met or that DET findings addressed the issue. Each of the DET findings were addressed by CP&L in the IAP, and NRC Inspection Report Nos. 50-325/89-34 and 50-324/89-34, dated November 30, 1989, established Unresolved Items (URIs) and Inspector Followup Items (IFIs) for a large number of the DET findings and corresponding IAP actions in order to track these items to closure through subsequent inspection activities. A number of the BIP items were subsequently closed during NRC

inspections in 1990, 1991, and 1992 through closure of corresponding URIs and IFIs. Since the long-term BIP items are being met and have been closed by closure of corresponding DET Findings, or are addressed by the Brunswick Three-Year Plan, maintaining the requirements of Confirmatory Order EA-82-106 in the Brunswick licenses is no longer necessary.

The commitments identified in the CP&L Corporate Improvement Initiatives and in the Brunswick Three-Year Plan fully address the root causes of contemporary performance concerns and issues at BNP. CP&L has established appropriate management and programmatic controls to ensure that these activities are effectively implemented and will continue to monitor performance closely to ensure long-lasting improvement. CP&L has committed, in our letter of December 15, 1992, which transmitted the Three-Year Plan to the NRC, and in public meetings with the NRC, to meet periodically with the NRC on a mutually agreeable schedule to report on the status of our implementation of the Brunswick Three-Year Plan. CP&L believes that these periodic status meetings will provide the most effective vehicle for the NRC to monitor and affirm the overall and long-lasting improvement that the Brunswick Plant is making in all phases of its operations.

Accordingly, CP&L requests that Confirmatory Order EA-82-106 be discontinued based upon the following considerations:

1. The BIP action items required by the Confirmatory Order have been implemented;
2. Implementation of the BIP action items and satisfaction of the requirements imposed by the Confirmatory Order have been confirmed by the NRC;
3. BIP action items of a longer term, continuing nature either are being met, have been superseded by equivalent action items, or have been appropriately closed ; and
4. Root causes of contemporary performance concerns and issues affecting BNP are fully addressed by the commitments identified in the CP&L Corporate Improvement initiatives and the Brunswick Three-Year Plan.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 NRC DOCKETS 50-325 & 50-324 OPERATING LICENSES DPR-71 & DPR-62 REQUEST FOR LICENSE AMENDMENTS TERMINATION OF "BRUNSWICK IMPROVEMENT PROGRAM"

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether significant hazards consideration exists. A proposed amendment to an operating license for a facility requires no consideration of significant hazards if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change

On December 22, 1982, the NRC issued Confirmatory Order EA-82-106 which required implementation of the "Brunswick Improvement Program" (BIP). The actions recommended in the BIP have been implemented. Accordingly, CP&L has met the requirements of Confirmatory Order EA-82-106. Because the Brunswick Units 1 and 2 operating licenses were amended pursuant to 10 CFR 50.54(h) to make them subject to Confirmatory Order EA-82-106, the Company is requesting license amendments to terminate the requirements of the Confirmatory Order.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. There are no physical changes to any safety-related equipment, no changes in any Technical Specification surveillance requirements or setpoints, and no changes to the manner in which the plant is operated as a result of the proposed amendment. The proposed license amendment terminates the requirements of Confirmatory Order EA-82-106, which formalized CP&L's commitment to the BIP. In accordance with its original schedule, the program was essentially completed as of December 31, 1983. In a letter dated April 3, 1984, the NRC's Regional Administrator stated that the NRC had "inspected each task action item in the BIP and found that CP&L had satisfied the requirements imposed by Confirmatory Order EA-82-106." The letter also requested CP&L to provide a periodic status report on those BIP actions that were "closed out due to being implemented, but will continue in an ongoing status." These status reports were provided by CP&L until May 30, 1986, when the final status report was submitted.

NRC Inspection Report Nos. 50-325/89-20 and 50-324/89-20, dated September 22, 1989, documents the results of an inspection to determine if the long-term BIP items, intended to

ensure continued improvement, were in place. This report also correlated BIP Items with the findings of the NRC Diagnostic Evaluation Team (DET) Inspection dated August 2, 1989. For each of the long-term BIP Items, the inspection report found that either the objective of the BIP Item continued to be met or that DET Findings addressed the issue. Each of the DET Findings were addressed by CP&L in the IAP, and NRC Inspection Report Nos. 50-325/89-34 and 50-324/89-34, dated November 30, 1989, established Unresolved Items (URIs) and Inspector Followup Items (IFIs) for a large number of the DET Findings and corresponding IAP actions in order to track these items to closure through subsequent inspection activities. A number of the BIP Items were subsequently closed during NRC inspections in 1990, 1991, and 1992 through closure of corresponding URIs and IFIs. Since the long-term BIP items are being met and have been closed by closure of corresponding DET Findings, or are addressed by the Brunswick Three-Year Plan, maintaining the requirements of Confirmatory Order EA-82-106 in the Brunswick licenses is no longer necessary.

Based on the above, the proposed amendment cannot involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated above, the proposed amendment does not involve any changes to safety-related equipment, Technical Specification surveillance requirements or setpoints, or the manner in which the plant is operated. Therefore, the proposed amendment cannot create the possibility of a new or different kind of accident.
3. The proposed amendment does not involve a significant reduction in the margin of safety. While each of the specific BIP actions was appropriate at the time of implementation, some of these actions are either implemented, no longer necessary, or their objectives can be achieved in a more efficient manner. As described in CP&L's letter dated October 26, 1987 (Serial: NLS-87-188), the Company committed to perform periodic review in five areas: Technical Specification Surveillance; In-Service Inspection/Appendix J; Commitment Verification; Technical Specification Amendments; and Regulatory Requirements Changes. Based on the results of these periodic reviews, enhancement to management programs, and ongoing improvements in procedural controls, CP&L believes that line management continues to improve with appropriate control of existing programs and, as such, termination of Confirmatory Order EA-82-106 would facilitate evolving management and process improvements.

Therefore, based on the above reasoning, the proposed amendment does not involve a significant reduction in the margin of safety.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NOS. DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
TERMINATION OF "BRUNSWICK IMPROVEMENT PROGRAM"

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ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change:

On December 22, 1982, the NRC issued Confirmatory Order EA-82-106 which required implementation of the "Brunswick Improvement Program" (BIP). The actions recommended in the BIP have been implemented. Accordingly, CP&L has met the requirements of Confirmatory Order EA-82-106. Because the Brunswick Units 1 and 2 operating licenses were amended pursuant to 10 CFR 50.54(h) to make them subject to Confirmatory Order EA-82-106, the Company is requesting license amendments to terminate the requirements of the Confirmatory Order.

Basis:

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed action merely serves to provide a means to terminate administratively a program that has been superseded by more contemporary programs. There will be no impact to systems involved in the production or treatment of effluents as a result of this administrative action; therefore, the change can not affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative

occupational radiation exposure. The proposed action merely serves to provide a means to terminate administratively a program that has been superseded by more contemporary programs. There will be no impact to systems involved in the production or treatment of effluents, nor will existing radiological controls be altered as a result of this administrative action; therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
 NRC DOCKET NOS. 50-325 & 50-324
 OPERATING LICENSE NOS. DPR-71 & DPR-62
 REQUEST FOR LICENSE AMENDMENT
 TERMINATION OF "BRUNSWICK IMPROVEMENT PROGRAM"

BIP ITEM STATUS SUMMARY		
ITEM	ACTION	COMMENTS
I-1	Establish centralized systematic program under Director of Regulatory Compliance for identifying, scoping, scheduling, tracking, or closing of all surveillance requirements and regulatory commitments and requirements.	Item I-1 is addressed by ongoing STSS and discussed by the following DET Paragraph/Finding (source - Inspection Report 50-325/324/89-20, September 22, 1989). 2.1.4.3 (3.4.1.1) - Positive Finding, Item Closed.
I-2	Document Corporate Procedure to address all NRC Confirmation of Action Letters.	Task complete per NRC letter dated April 3, 1984.
II-1	Establish a Nuclear Operations procedure governing the standardization and preparation of plant procedures.	Task complete per NRC letter dated April 3, 1984.
II-2	Utilize the services of a qualified consultant to modify or develop necessary plant operating procedures (effort to be conducted in concert with "Users" and subject to procedure in Item II-1).	Item II-2 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989). 2.1.2.6 (3.2.3) - IFI 89-34-41 This Item was addressed by IAP Item G3, which was inspected and closed by the NRC in Inspection Reports 90-31 and 91-27. 2.1.4.4 (3.4.1.3) - IFI 89-34-26, Closed per Inspection Report 91-11. 2.1.4.6 (3.4.1.4) - IFI 89-34-38, Closed per Inspection Report 90-32.

BIP ITEM STATUS SUMMARY		
ITEM	ACTION	COMMENTS
II-3A	Review 100% of existing and new surveillance procedures used to meet regulatory requirements for technical adequacy.	<p>Item II-3A was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989).</p> <p>2.1.4.1 (3.4.1.1) - IFI 89-34-17, Closed per Inspection Report 91-11.</p> <p>2.1.4.2 (3.4.1.2) - URI 89-34-04, Closed per Inspection Report 92-07.</p> <p>2.1.4.3 (3.4.1.2) - This item was satisfied in Inspection Report 89-34, Section 6.b, page 16, by closure of LER 1-89-16.</p> <p>After BIP initiation in 1982 a comprehensive program of first & second party nuclear safety and technical reviews was established (Tech Spec 6.5.1). In addition, the Nuclear Assessment Department (NAD) reviews procedures as an integral part of its performance-based assessment process, although the NAD review is not an in-line or 100% review. NAD is also charged with making recommendations for revised procedures in accordance with Tech Spec 6.2.3.</p>
II-3B	Review changes in revised operational procedures for technical adequacy; i.e., 100% for safeguards procedures and selected screening for others.	Task complete per NRC letter dated April 3, 1984.
III-1	Expand surveillance of ISI, Appendix J, Technical Specifications, and Regulatory Requirements to enhance comprehensiveness and increase frequencies.	<p>Item III-1 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989).</p> <p>2.1.5.3 (3.5.3) - IFI 89-34-36,37 - Closed per Inspection Report 92-39.</p> <p>2.1.5.6 (3.5.4) - IFI 89-34-18 - Closed per Inspection Report 92-39.</p>

BIP ITEM STATUS SUMMARY		
ITEM	ACTION	COMMENTS
III-2	Establish program for QA to monitor plant's implementation of technical specification revision and regulatory requirements.	Task was met per Inspection Report 50-325/324/89-20, September 22, 1989. This item will be assessed in conjunction with NAD's routine performance-based assessment of plant activities.
III-3	Require QA to perform 100% review of technical specification requirements every three years.	This item was covered by IAP item D.1.d. This item will be assessed incidental to NAD's routine performance-based assessment of plant activities. This item was closed per Inspection Report 92-39 along with Item III-1.
III-4	Establish program for periodic review of items III-1, 2, and 3 by Corporate Auditing.	<p>Item III-4 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989).</p> <p>2.1.4.1 (3.4.1.1) - IFI 89-34-17 - Closed per Inspection Report 91-11.</p> <p>2.1.4.2 (3.4.1.2) - URI 89-34-04 - Closed per Inspection Report 92-07.</p> <p>2.1.4.3 (3.4.1.2) - This item was satisfied in Inspection Report 89-34, Section 6.b, page 16, by closure of LER 1-89-16. See Item II-3A.</p> <p>2.1.5.6 (3.5.4) - IFI 89-34-18 - Closed per Inspection Report 92-39.</p>
III-5 Part 1	Modify Corporate QA Program to include an escalation mechanism.	Task complete per NRC letter dated April 3, 1984.
III-5 Part 2	Modify Corporate QA Program to include three levels of nonconformance.	Task complete per NRC letter dated April 3, 1984.
IV-1	Continue the post maintenance testing program established as part of the prestart-up action list (continue to evaluate).	<p>Item IV-1 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989).</p> <p>2.1.4.10 (3.4.3.2) - IFI 89-34-21 - Closed to DEV 92-04-01, VIO 92-04-02 - Addressed by 3-Yr Plan Item TY501.</p>

BIP ITEM STATUS SUMMARY		
ITEM	ACTION	COMMENTS
V-1	Upgrade program for the training of appropriate personnel in the post modification aspects of plant systems and components.	Item V-1 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989). 2.1.2.14 (3.2.6.6) - Positive Finding, Item Closed.
V-2	Develop and incorporate a film into the General Employee Training Program to cover the Discipline of Operations, procedural compliance and the philosophy of conservatism with respect to regulatory compliance.	Item V-2 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989). 2.1.2.6 (3.2.3) - TFI 89-34-41 This Item was addressed by IAP Item G3, which was inspected and closed by the NRC in Inspection Reports 90-31 and 91-27. See Item II-2.
V-3	Develop a training film on quality performance and incorporate into General Employee Training.	Task complete per NRC letter dated April 3, 1984.
V-4	Repeat the previously given corporate position on Discipline of Operations, procedural compliance, and regulatory philosophy on an annual basis, including testing as a part of the rebadging process.	Task complete per NRC letter dated April 3, 1984.
V-5	Upgrade the program for providing training in industry-wide events, incidents, and operating experience reports.	Item V-5 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989). 2.1.2.14 (3.2.6.6) - Positive Finding, Item Closed.
V-6	Train selected unit managers and supervisors in BSEP specifics: A. Three weeks of classroom training on systems operations and design. B. One week of plant and equipment orientation. C. One week of BWR Simulator Training.	Task complete per NRC letter dated April 3, 1984.

BIP ITEM STATUS SUMMARY		
ITEM	ACTION	COMMENTS
V-7	Establish a formalized system to ensure that timely training is provided appropriate personnel regarding new procedures and procedural revisions.	See Item V-1. Inspection Report 50-325/324/89-20, September 22, 1989, Section 10, page 18 concluded that this objective continues to be met.
VI-1	Reassign some of the independent review function responsibilities off site to provide increased opportunity for direct plant observation.	Item VI-1 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989). 2.1.5.5 (3.5.5) - No IFI - This Item was satisfied per Inspection Report 89-34, Section 5, page 13.
VI-2	Initiate a program of periodic review of safety system challenges and reactor transients.	Task complete per NRC letter dated April 3, 1984. Also see Inspection Report 50-325/324/89-20, September 22, 1989, Section 10 page 19.
VI-3	Increase emphasis on direct surveillance and walk-through activities - to include frequent review of operations' logs, direct observation of individual actions, advanced identification of activities to be reviewed, and written reports which summarize activities and results as well as noted deficiencies and recommendations.	Task complete per NRC letter dated April 3, 1984. This BIP Item continues to be met per Inspection Report 50-325/324/89-20, Section 10, page 20, September 22, 1989.
VI-4	Increase effort on special investigative activities - to include prompt review of incident and human factors summary reports with follow-up evaluations as needed. It will also include increased sensitivity to the conduct of special investigations as established by CNS or operations with follow-up reports and recommendations.	Item VI-4 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989). 2.1.5.5 (3.5.5 and 3.4.1.2) - No IFI - This Item was satisfied per Inspection Report 89-34, Section 5, page 13. See Item VI-1.

BIP ITEM STATUS SUMMARY		
ITEM	ACTION	COMMENTS
VI-5	Hold quarterly nuclear safety review meetings to discuss selected issues arising from the routine independent review program and the ISEG program. Selected managers from other CP&L organizations and outside consultants will be invited.	Item VI-5 was addressed in Inspection Report 50-325/324/89-20, September 22, 1989, Section 10, page 20. CP&L has reinstituted the Nuclear Safety Review Committee under Initiative 2 of the Corporate Improvement Initiatives, which fulfills this BIP Item.

BIP ITEM STATUS SUMMARY		
ITEM	ACTION	COMMENTS
VII-1	Management Analysis Company has been retained to perform review of Corporate QA Program.	<p>Item VII-1 was addressed by the following DET Paragraphs/Findings (source - Inspection Report 50-325/324/89-20, September 22, 1989).</p> <p>2.1.1.1 (3.1.1 and 3.1.2) - No IFI - This Item is being addressed by 3-Yr Plan Item TY204.</p> <p>2.1.1.3 (3.1.3) - IFI 89-34-11 - Closed per Inspection Report 90-37.</p> <p>2.1.1.4 (3.1.1 and 3.1.2) - No IFI - This Item is being addressed by 3-Yr Plan Items TY201 and TY204.</p> <p>2.1.1.5 (3.1.3) - IFI 89-34-11 - Closed per Inspection Report 90-37.</p> <p>2.1.1.7 (3.1.4) - IFI 89-34-23,24 - Closed to VIO 92-10-01 in Inspection Report 92-39 - Addressed by 3-Yr Plan Item TY303.</p> <p>2.1.1.9 (3.1.6) - Positive Finding, Item Closed.</p> <p>2.1.5.2 (3.5.2) - IFI 89-34-23,24 - Closed to VIO 92-10-01 in Inspection Report 92-39 - Addressed by 3-Yr Plan Item TY303.</p> <p>2.1.6.12.a,b (3.6.2.2.1 and 3.6.1.1.2)- IFI 89-34-12 - Closed per Inspection Report 90-16.</p> <p>IFI 89-34-13 - Closed per Inspection Report 90-39.</p> <p>IFI 89-34-22 - Closed per Inspection Report 91-27.</p> <p>2.2 - DET Root Causes - Addressed by 3-Yr Plan Items TY101, TY102, TY104, TY201, TY203, TY204, TY205, TY302, TY303, TY401, TY503, TY506.</p>
VII-2	Initiate study to reduce outside demands on plant staff to allow more attention to operations and maintenance.	<p>Task complete per NRC letter dated April 3, 1984.</p> <p>This BIP Item continues to be met per Inspection Report 50-325/324/89-20, Section 10, page 21, September 22, 1989.</p>

BIP ITEM STATUS SUMMARY		
ITEM	ACTION	COMMENTS
VII-3	Commence INPO assessment of operational activities, CNS, corporate/plant interface, and PNSC activities.	Inspection Report 50-325/324/89-20, Section 10, page 21, September 22, 1989, concluded that certain issues raised by INPO still existed as problems at Brunswick. The root causes of the issues were reflected in the findings of the DET and the findings of Special Inspection Report 92-12. No further followup or action on this BIP item is required. See Item VII-1.
VII-4	Develop implementation schedule for appropriate recommendation of the shift foreman time utilization study.	Task complete per NRC letter dated April 3, 1984.
VII-5	Develop implementation schedule for appropriate recommendations of the Essex Corporation Human Factors Study.	Task complete per NRC letter dated April 3, 1984. No further followup or action on this BIP Item is required by the NRC per Inspection Report 50-325/324/89-20, Section 10, page 21, September 22, 1989.
VII-6	Prepare a "Conduct of Operations" Manual to promote consistency among operating nuclear plants.	Task complete per NRC letter dated April 3, 1984.