



Brunswick Nuclear Plant  
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NOV 09 1994

SERIAL: BSEP 94-0459

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62  
RESPONSE TO CONCERNS ADDRESSED IN NRC INSPECTION REPORT NOS. 50-325/94-23  
AND 50-324/94-23

Gentlemen:

This letter is to respond to comments delineated within NRC Inspection Report Nos. 50-325/94-23 and 50-324/94-23 dated October 4, 1994.

Based on three of sixteen crew failures encountered during the BNP Annual Operating Exams, Carolina Power & Light performed a root cause analysis. Additionally, the Corporate Performance Evaluation Section performed an assessment of all three of CP&L's nuclear sites to review common training issues and verify the appropriateness of corrective actions taken or planned.

From the root cause analysis, weaknesses in individual operator and crew performance were noted in self-checking, communications between operators, and adherence to expected practices for diagnosing and verifying system status. Failure to recognize the magnitude of the problem was due to inadequate analysis of data. Additionally, no comparison was made between operator simulator performance and Operations Corrective Action Program (CAP) data.

To track operator areas needing improvement, the Brunswick Training Section is developing a method to compare Operations CAP data and simulator competency information. This method will capture weaknesses noted during simulator performance in the CAP data base and allow Operations and training management another opportunity to identify generic weaknesses.

To provide structured retraining for operators who demonstrated weaknesses but who met the passing criteria, the Brunswick Training Section has instituted a "Pass with Remediation" category for simulator examinations and training. This process allows for identifying and remediating operators before standing a watch if performance on critical tasks or individual competencies needs improvement.

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These corrective actions are intended to:

- a. Capture weak operator performance in competencies;
- b. Inform operators of their weaknesses;
- c. Allow for remediations;
- d. Trend areas of concern using the CAP; and
- e. Allow a convenient mechanism for management follow-up.

Improvements in communications, attention to panel conditions, and self-checking by operators on the units and during simulator training are expected.

In addition, Operations has developed an approach to enhance human performance in the areas of verbal communication, self-checking, diagnostics, and verification of system status. The approach integrates management Licensed Operator Retraining (LOR) briefings and implementation of a culture of Continuous Self-Improvement, with a series of Effectiveness Self-Assessments. The process is designed to reinforce the Shift Supervisor as the culture leader for his crew, provide him tools to assist in culture development, and to hold him accountable for results. The following provides further details regarding this approach:

- **Management LOR Briefings**

During the phase of LOR which began on October 2, 1994, the first simulator scenario for each crew has been the evaluated scenario. This has been implemented to assess the operational readiness of each crew at the beginning of the week. In addition, a designated member of Operations management has conducted a briefing with crew personnel on Day 1 of each LOR week to reinforce expectations in the areas of communications, procedures, diagnostics, and self-checking.

- **Shift Supervisor Human Performance Enhancement Sessions**

In conjunction with the Human Performance Group (HPG), human performance enhancement sessions were conducted with the Operations Shift Supervisors. The purpose of the sessions was to:

- Provide insight regarding what Operations performance related information is contained within the Operations Corrective Action Program (CAP)
- Implement a strategy of continuous self-improvement
- Provide the Shift Supervisor specific tools to use in the pursuit of excellence
- Reinforce the Shift Supervisor as the culture leader of his crew.

- **Effectiveness Self-Assessments**

An Effectiveness Self-Assessment is being conducted which will provide four separate twelve-hour surveillances of each operating crew. During the self-assessment, each crew will be evaluated in the areas of attitude, communications, teamwork, and self-checking, using an evaluation grading sheet. This initial self-assessment will provide a baseline of performance for each crew in all four areas. The results of the self-assessment will be communicated to the Shift Supervisors, who will then reinforce the weak areas and capitalize on the strengths of their crews.

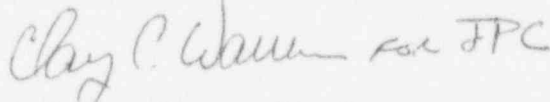
A follow-up Effectiveness Self-Assessment is scheduled for June of 1995, providing a means to directly quantify the results of the continuous self-improvement process. Based upon these results, the process will then be enhanced as necessary.

- **Shift Supervisor Structured Coaching**

Operations managers are conducting routine structured coaching sessions with individual Shift Supervisors. The intent of these sessions is to review crew performance and to discuss improvement initiatives being implemented by the Shift Supervisor. This ongoing effort will enhance the communication of expectations and provide routine direct feedback on crew performance.

Operations is taking an integrated approach toward the achievement of excellence in human performance, fully recognizing the Shift Supervisors as the leaders. Through continuous assessment of our Corrective Action Sub-Program and our aggressive self-assessment efforts, constant feedback to the Shift Supervisors on the results of their efforts will be provided.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. Cowan", followed by the text "for JPC" in a smaller, less legible script.

J. Cowan, Director-Site Operations  
Brunswick Nuclear Plant

SFT/

Enclosure

cc: Mr. S. D. Ebnetter, Regional Administrator, Region II  
Mr. P. D. Milano, NRR Project Manager - Brunswick Units 1 and 2  
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector  
The Honorable H. Weils, Chairman - North Carolina Utilities Commission

Enclosure  
List of Regulatory Commitments

The following table identifies those actions committed to by Carolina Power & Light Company in this document. Any other actions discussed in the submittal represent intended or planned actions by Carolina Power & Light Company. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Brunswick Nuclear Plant of any questions regarding this document or any associated regulatory commitment.

Commitment		Committed date or outage
1.	A method for comparing Operations Corrective Action Program data and simulator competency information will be developed.	2/28/95
2.	Perform a follow-up Effectiveness Self-Assessment which will provide a means to directly quantify the results of the continuous self-improvement process.	6/30/95