



Carolina Power & Light Company

Brunswick Nuclear Project
P.O. Box 10429
Southport, NC 28461-0429
June 13, 1991

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Mr. S.D. Ebnetter, Administrator
U.S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, NW
Atlanta, GA 30323

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 & 2
DOCKET NOS. 50-324, 50-325
LICENSE NOS. DPT-62, DPR-71
INTEGRATED ACTION PLAN STATUS

Dear Mr. Ebnetter:

Enclosed is our monthly status report on the Brunswick Integrated Action Plan.

Please give me a call if you have any questions concerning this report.

Very truly yours,

R.B. Starkey, Jr., Vice President
Brunswick Nuclear Project

WWS
6/11/91

MBK/bgc

Enclosure

cc: BSEP Resident Office
Mr. K.J. Ahern
Mr. R.E. Carroll
Mr. L.I. Loflin
Mr. J.W. Spencer

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Carolina Power & Light Company

Brunswick Nuclear Project

June 13, 1991

MEMORANDUM TO: Mr. R.A. Watson
FROM: R.B. Starkey, Jr.
SUBJECT: Monthly Status Report - Integrated Action Plan

As of the end of April 1991, 58 of 64 Level 1 Action Items are reported as complete. Of the 291 Level 2 Action Items, 278 (95.5%) are complete.

One IAP Level 1 Action Item was completed in April:

- G1, Implement Actions to Resolve People Issues, Including Employee Suggestion System

IAP Level 1 Action Item D4, Develop Post-maintenance Testing for ASME Code Repairs, has been re-opened. An explanation is provided for this item within the attached Integrated Action Plan Status Report.

Independent reviews have been completed on 43 Level 1 Action Items, and 13 more are in progress. A Schedule of Independent Assessments is a part of this report package.

Effectiveness reporting schedules have been established for IAP Action Items which we are reporting as completed.

WWS
6/11/91

MBK/bgc

Attachment

cc: Mr. H.R. Banks	Mr. T.L. Kosmatin	Mr. B.R. Poteat
Mr. R.M. Barrett	Mr. B.P. Leonard	Mr. R.B. Richey
Mr. J.M. Brown	Mr. J.P. Leviner	Mr. W.W. Simpson
Ms. K.M. Core	Mr. A.M. Lucas	Mr. M.S. Staton
Mr. C.R. Dietz	Mr. L.H. Martin	Mr. J.G. Titrington
Mr. M.R. Foss	Mr. B.D. McFeaters	Ms. M.S. Timberlake
Mr. M.D. Hill	Ms. P.D. Morris	Mr. G.E. Vaughn
Mr. J.R. Holder	Mr. J.W. Moyer	Mr. R.L. Warden
Mr. M.A. Jones	Mr. R.C. Phillips	Ms. S.V. Williams

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
A1	COMMUNICATION STRATEGY FOR GOALS, PRIORITIES, EXPECTATIONS	Starkey BNP	12/31/90	Complete	An Independent Review has been completed by Audit Services. This Action Item has been closed by the NRC, Report 90-37, dated 10/18/90.
A2	IMPROVE EXTERNAL RELATIONSHIPS	Watson NGG	01/31/90	Complete	An Independent Review has been completed by Corporate QA.
B1	IMPLEMENT TECHNICAL SUPPORT IMPROVEMENTS	Helme Tech Support	09/30/90	Complete	An Independent Review has been completed by Audit Services. This Action Item has been closed by the NRC, Report 90-16, dated 05/02/90.
B2	IMPLEMENT NED ORGANIZATIONAL IMPROVEMENTS	Brown NED	06/30/90	Complete	An Independent Review has been completed by Management Services. The NRC considers this Action Item "open."
B3	IMPLEMENT NUCLEAR TRAINING ORGANIZATIONAL IMPROVEMENTS	Leonard BTU	06/30/90	Complete	An Independent Review is in progress by Management Services. This Action Item has been closed by the NRC, Report 90-39, dated 10/05/90.
B4	IMPLEMENT CONTROL & ADMINISTRATION ORGANIZATIONAL IMPROVEMENTS	Simpson C&A	12/31/89	Complete	An Independent Review is in progress by Management Services.

*Indicates change from last month's report.

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BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
B5	IMPLEMENT NUCLEAR PLANT SUPPORT ORGANIZATIONAL IMPROVEMENTS	Hill NPS	06/30/90	Complete	An Independent Review has been completed by Management Services.
B6	IMPLEMENT OUTAGE MANAGEMENT & MODIFICATIONS ORGANIZATIONAL IMPROVEMENTS	Holder OM&M	12/31/89	Complete	An Independent Review has been completed by Audit Services. The NRC considers this Action Item "open."
B7	Construct Permanent Office Building	Johnson OM&M	10/31/93	03/30/93	Combined design/build reflects an earlier completion date. Date includes Phase II: parking and paving.
	a. Develop a Brunswick Site Facilities Plan	Broadway Mgmt. Svcs	09/30/90	Complete	
	b. Provide project scope and funding to the Nuclear Engineering Department, to begin site investigation and development of a request for bids.	Simpson C&A	09/30/90	Complete	
	c. Complete site investigation and issue requests for bids.	Johnson OM&M	03/31/91	05/20/91*	*Site investigation complete as of 04/15/91. Issuance of requests for bids delayed due to additional reviews.
	d. Award bid for design/build contract.	Johnson OM&M	05/31/91	07/01/91*	Combined design and construction bids under one contract.
	e. Complete site preparation.	Johnson OM&M	05/31/92	05/31/92	

*Indicates change from last month's report.

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BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	f. Complete construction and begin relocation of personnel.	Johnson OM&M	10/31/93	12/31/92*	Reflects completion of building only.
C1	IMPLEMENT CORPORATE NUCLEAR PRIORITIZATION PROCESS	Wagoner OM&M	06/30/90	Complete	An Independent Review has been completed by Management Services. The NRC considers this Action Item "open."
C2	ESTABLISH NED BUDGET ITEM FOR GENERIC WORK	Brown NED	12/31/89	Complete	An Independent Review has been completed by Management Services.
C3	ESTABLISH BUDGET & RELEASE PROCESS FOR NON-IPBS ENGINEERING	Wagoner OM&M	12/31/89	Complete	*An Independent Review has been completed by Management Services.
C4	DEVELOP LONG RANGE PLANNING BUDGETS FOR EMERGING ISSUES/REGULATIONS	Vaughn NSD	12/31/90	Complete	An Independent Review has been completed by Management Services.
D1	RESOLVE SURVEILLANCE TEST PROGRAM QUESTIONS	Starkey BNP	03/31/90	Complete	An Independent Review has been completed by Audit Services. The NRC considers this Action Item "open."
D2.1	IMPROVE MANAGEMENT OF MAINTENANCE BACKLOG	Warden Maintenance	06/30/90	Complete	An Independent Review has been completed by Management Services. This Action Item has been closed by the NRC, Report 91-07, dated 03/21/91.

*Indicates change from last month's report.

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BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
D2.2	STRENGTHEN MAINTENANCE PLANNING FUNCTIONS	Warden Maintenance	06/30/90	Complete	An Independent Review has been completed by Management Services. This Action Item has been closed by the NRC, Report 91-07, dated 03/21/91.
D3	FINE TUNE MOV MAINTENANCE PROGRAM	Warden Maintenance	06/30/90	Complete	The NRC considers this Action Item "open."
D4	Develop Post-Maintenance Testing for ASME Code Repairs	Helme Tech Support	10/15/89	To be determined (Re-opened)	*Re-opened to allow additional time to adequately evaluate the effectiveness of actions already in place. An action plan will be submitted within 30 days, detailing activities, and a new target date established. An Independent Review has been completed by BNP Site QA. The NRC considers this Action Item "open."
	a. Complete development of ENP-16.12	Helme Tech Support	10/15/89	To be determined	
	b. Complete development of PLP-08	Helme Tech Support	10/15/89	To be determined	
D5	Implement Recommendations of HPCI Reliability-Centered Maintenance Study	Helme Tech Support	12/31/90	05/31/91	Need for a new Maintenance procedure has been identified, and is being prepared.

*Indicates change from last month's report.

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BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	a. Review HPCI RCM and list recommendations, evaluate and prioritize recommendations, categorize recommendations, perform cost/benefit analysis of recommendations, and perform potential problem analysis.	Helme Tech Support	02/15/90	Complete	
	b. Obtain management direction on recommendations.	Helme Tech Support	03/31/90	Complete	
	c. Implement changes requiring procedure revisions only.	Helme Tech Support	09/01/90	05/31/91	Procedure revisions are complete. A new Maintenance procedure is required which is now being developed.
	d. Initiate PID's on items requiring modifications, if any.	Helme Tech Support	07/01/90	Complete	
	e. Obtain vendor concurrence on recommendations affecting vendor recommendations.	Helme Tech Support	09/01/90	Complete	
	f. Initiate diesel generator RCM in conjunction with CNS SSFI on diesel generators, by performing actions in (a.) above for diesels.	Helme Tech Support	10/31/90	Complete	
	g. Present results to management of HPCI work to date.	Helme Tech Support	09/01/90	Complete	

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	h. Establish program to review impact of HPCI RCM quarterly.	Helme Tech Support	09/01/90	Complete	
	i. Assess value of RCM for RCIC and other safety systems.	Helme Tech Support	12/01/90	Complete	
	j. Repeat actions of HPCI RCM for diesel generators, starting with (b.) above.	Helme Tech Support	11/01/90	Complete	
	k. Present results of RCIC and other safety systems' RCM review to management with recommendations.	Helme Tech Support	12/31/90	Complete	
D6	ADDRESS SERVICE WATER SYSTEM DESIGN ISSUES	Brown NED	11/30/90	Complete	*An Independent Review is in progress by On-Site NAD. This Action Item has been closed by the NRC, Report 91-01, dated 02/12/91.
D7	Confirm Design Basis for Key Brunswick Systems	Brown NED	12/31/91	12/31/93	The scope of this Action Item has been greatly increased. The NRC considers this Action Item "open."

*Indicates change from last month's report.

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**BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991**

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	a. Complete the United Engineers & Constructors (UE&C) and General Electric System Design Criteria Turnover Project.	Bishop NED	12/31/91	12/31/93	*The GE design basis document effort has 13 of 15 DBDs now working. The CP&L licensing file search is 100% complete. Engineering historical file searches are 100% complete. Review and cataloging of UE&C Study Reports and calculations is 100% complete; of plant modification calculations is 70% complete; and of Engineering Evaluation Reports (EERs) is 25% complete.
	b. Complete the UE&C Piping Design Turnover Project.	Langlois NED	12/31/91	05/31/92	*Schedule completion is being monitored by large and small bore piping system milestone date charts. Seismic analysis deferral from 12/91 to 05/92 was based on relative safety significance of remaining seismic work. High risk systems are scheduled first. PRA indicates higher priority associated with electrical design. Industry evaluation of earthquake data supports lower risk.
	c. Evaluate the results of the SW modification review and SSFI findings and the HPCI and SLC SSFI results, and commitment date. Management is to identify and document any further necessary actions.	Brown NED	06/30/90	Complete	

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
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IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
D8	COMPLETE UPDATE OF CORPORATE AND SITE DESIGN PROCEDURES	Brown NED	03/31/90	Complete	An Independent Review has been completed by Audit Services. This Action Item has been closed by the NRC, Report 90-16, dated 05/02/90.
D9	IMPLEMENT CORRECTIVE ACTION PROGRAM IMPROVEMENTS	Spencer BSEP	04/30/90	Complete	*An Independent Review has been completed by NAD. The NRC considers this Action Item "open."
D10	DEVELOP AND INSTITUTIONALIZE CORPORATE CORRECTIVE ACTION PROGRAM	Vaughn NSD	12/31/90	Complete	*An Independent Review has been completed by NAD. The NRC considers this Action Item "open."
D11	DEVELOP CORPORATE PROGRAM FOR CONSISTENT PERFORMANCE OF SAFETY REVIEWS	Crawford CNS	02/15/90	Complete	An Independent Review has been completed by BNP Site QA. The NRC considers this Action Item "open."
D12	IMPROVE BUSINESS PLANNING PROCESS	Simpson C&A	06/30/90	Complete	An Independent Review has been completed by Management Services.
D13	REVIEW BNP PROCEDURES FOR COMPLIANCE WITH PAM INTENT	Kesmodu C&A	04/01/90	Complete	An Independent Review has been completed by Audit Services. This Action Item has been closed by the NRC, Report 91-11, dated 04/16/91.
D14	IMPROVE CONSISTENCY OF PROCUREMENT PROCESSES BY NUCLEAR PLANTS	Hill NPS	10/01/90	Complete	An Independent Review is in progress by Management Services.

*Indicates change from last month's report.

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BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
D15	REQUIRE NUCLEAR SERVICES DEPARTMENT INVOLVEMENT IN REGULATORY DRIVEN MODIFICATIONS	Vaughn NSD	12/31/90	Complete	An Independent Review has been completed by Management Services.
D16.1	INCREASE ROLE OF NUCLEAR PLANT SUPPORT IN DEVELOPMENT OF CONSISTENCY AMONG NUCLEAR PLANTS	Vaughn NSD	12/31/90	Complete	An Independent Review has been completed by Management Services.
D16.2	FORMALIZE INITIATIVES TO STANDARDIZE PROCESSES AND PROCEDURES	Vaughn NSD	12/31/90	Complete	An Independent Review has been completed by Management Services.
D17	INCREASE USE OF ISD'S DIRECTIVES AND RESOURCES	Simpson C&A	12/31/89	Complete	An Independent Review has been completed by Management Services.
D18	SUBMIT SIMULATOR CERTIFICATION	Leonard BTU	12/31/90	Complete	*An Independent Review has been completed by On-Site NAD. The NRC considers this Action Item "open."
	a. Integrate and complete the test program for the upgraded boiler/core models.	Geise BTU	03/01/90	Complete	
	b. Complete test program required for certification.	Geise BTU	09/01/90	Complete	
	c. Complete document to support certification.	Geise BTU	12/01/90	Complete	

*Indicates change from last month's report.

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BRUNSWICK NUCLEAR PROJECT
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IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	d. Submit certification package to management for review.	Geise BTU	12/01/90	Complete	
	e. Submit package to NRC.	Geise BTU	12/31/90	Complete	
D19.1	IMPLEMENT SYSTEM FOR RESPONDING TO TRAINING REQUESTS	Leonard BTU	05/31/90	Complete	An Independent Review is in progress by Management Services.
D19.2	PROVIDE COORDINATED RESPONSE TO REGULATORY-RELATED TRAINING REQUESTS	Leonard BTU	05/31/90	Complete	An Independent Review is in progress by Management Services.
D20	REVISE STANDING INSTRUCTIONS PROCEDURE TO REQUIRE INDEX LOG	Moyer Operations	10/27/89	Complete	An Independent Review has been completed by Corporate QA. This Action Item has been closed by the NRC, Report 90-02, dated 02/16/90.
D21	REVIEW SWFCG CHARTER/GUIDES FOR CURRENT GOALS, PRIORITIES	Peeler OM&M	07/31/90	Complete	An Independent Review has been completed by Management Services. This Action Item has been closed by the NRC, Report 90-42, dated 10/29/90.
D22	IMPLEMENT TAGGING AND LABELING IMPROVEMENT PROGRAM	Warden Maintenance	02/28/90	Complete	An Independent Review has been completed by Audit Services. This Action Item has been closed by the NRC, Report 90-39, dated 10/05/90.

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
D23	Integrate PM Vibration Program with ASME Sec. XI IST Program	Helme Tech Support	12/31/90	10/31/91	The original intent of this Action Item was met by the original target date. However, a portion of this Action Item has been merged with another ongoing program which is scheduled for completion in late 1991.
	a. Approve and implement a Vibration Monitoring Procedure.	Helme Tech Support	12/31/89	Complete	
	b. Ensure all equipment is marked, indicating points from which to take readings.	Helme Tech Support	02/28/90	Complete	
	c. Purchase data collector instrumentation to be used to collect the vibration data.	Helme Tech Support	02/28/90	Complete	
	d. Provide Real-Time Training to Auxiliary Operators on operation of data collectors.	Helme Tech Support	02/28/90	Complete	
	e. Develop reference values and baselines to establish the initial points and determine the "alert" and "required action" ranges.	Helme Tech Support	05/31/90	09/30/91	
	f. After establishing mark points and ranges, revise PT's accordingly.	Moyer Operations	08/31/90	10/31/91	

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
D24	IMPLEMENT BUDGETING OF SMALL ENGINEERING PROJECTS	Helme Tech Support	12/31/90	Complete	An Independent Review has been completed by Management Services. This Action Item has been closed by the NRC, Report 90-23, dated 07/11/90.
D25	USE PROJECT MANAGEMENT APPROACH IN PLANNING/EXECUTION OF OUTAGES	Moore OM&M	07/31/89	Complete	An Independent Review has been completed by Audit Services.
D26	FORMALIZE PLANT WORK SCHEDULE ADHERENCE CONTROL	Spencer BSEP	12/31/89	Complete	An Independent Review has been completed by Management Services.
D27	IMPROVE TRACKING/DISPOSITION OF TEMPORARY REPAIRS/CONDITIONS TO EXPEDITE ELIMINATION	Helme Tech Support	12/31/89	Complete	An Independent Review has been completed by BNP Site QA.
D28	REVISE EOP'S TO SIMPLIFY AND MATCH BWROG GUIDELINES	Moyer Operations	12/31/90	Complete	*Aa Independent Review has been completed by NAD. This Action Item has been closed by the NRC, Report 91-11, dated 04/16/91.
D29	IMPLEMENT NGG GUIDELINE RE: STRUCTURE OF CP&L ISI PROGRAMS, AND ESTABLISHMENT OF 6-MONTH INFORMATION EXCHANGES	Hill NPS	06/30/90	Complete	An Independent Review has been completed by BNP Site QA. This Action Item has been closed by the NRC, Report 90-32, dated 10/18/90.
D30	IMPLEMENT ACTIONS FOR ADMINISTRATIVE COST CONTAINMENT	Simpson C&A	06/30/90	Complete	An Independent Review has been completed by Management Services.

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
D31	CONSOLIDATE, UPDATE, SIMPLIFY BNP PROCEDURES	Simpson C&A	09/30/90	Complete	An Independent Review has been completed by Audit Services. The NRC considers this Action Item "open."
D32	IMPLEMENT BRUNSWICK NUCLEAR PROJECT DEPARTMENT LICENSED OPERATOR TRAINING IMPROVEMENTS	Moyer Operations	01/15/91	Complete	The NRC considers this Action Item "open."
D33	Implement Nuclear Services Department Licensed Operator Training Improvements	Leonard BTU	03/29/91	08/31/91	The NRC considers this Action Item "open."
	a. Review the adequacy of training staffing levels, and identify near term needs.	Leonard BTU	07/31/90	Complete	*Additional Closure documentation will be provided in May 1991.

*Indicates change from last month's report.

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BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	b. Increase the number of simulator training hours to a minimum of sixteen hours per quarter per licensed operator, and assess the impact of this change on the adequacy of training staffing levels.	Leonard BTU	09/30/90	05/31/91 (re-opened)	TI-200 has been revised to require a minimum of 64 simulator training hours per licensed operator per year, meeting the original intent of D331. By 05/31/91, TI-200 will be further revised to require a minimum of 8 hours of simulator training per quarter, with 64 hours remaining as the annual minimum. (The originally proposed 16 hours per quarter may be unreasonable due to other training commitments and constraints.)
	c. Revise the Licensed Operator Requalification Training Instruction to ensure operators receive adequate simulator training time in all licensed positions for which they may be examined.	Leonard BTU	10/31/90	Complete	*Additional Closure documentation will be provided in May 1991.

*Indicates change from last month's report.

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IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
d.	Establish rigorous standards, performance expectations, and monitor operator performance, via reports and personal involvement, especially for the annual dynamic simulator evaluation. Periodically sample the results of simulator training to monitor operator performance. (Periodic monitoring and assistance in administering annual simulator examinations will be provided by Operations.) Place these requirements in the appropriate training instructions.	Leonard BTU Moyer Operations	10/31/90	Complete	*Additional Closure documentation will be provided in May 1991.
e.	Revise the appropriate training procedures to establish objective simulator performance evaluation criteria for both Licensed Operator Requalification and Hot License examinations, at least as stringent as the NRC test criteria.	Leonard BTU	10/31/90	Complete	
f.	Incorporate installation of an uninterruptible power supply for the simulator into the prioritized work planning process.	Leonard BTU	12/15/90	Complete	*Additional Closure documentation provided 4/10/90. The installed system has performed satisfactorily during testing and during an unplanned power outage to the simulator.

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
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IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	g. Establish a remedial training program which addresses the operators' deficiencies, minimizes the disruption to Operations and Training work schedules, and provides rigorous feedback to enhance the operator training program.	Leonard BTU	12/15/90	Complete	
	h. Review and establish long-term resource staffing needs and associated training staff requirements.	Leonard BTU	12/31/90	Complete	*Additional Closure documentation will be provided in May 1991.
	i. Revise the responsibilities of the existing Training Advisory Committee to include a review, on a quarterly basis, of changes in operating philosophy, regulatory requirements, operator crew composition, et cetera (other than simulator changes), that might affect the training program.	Leonard BTU	12/31/90	Complete	
	j. Improve the use of available information by establishing guidance to assure that industry information is properly analyzed, disseminated, and used to improve performance.	Leonard BTU	01/15/91	Complete	Instructors have been trained by the Manager - BTU, on effective methods for addressing operating experience. TI-200, 3.9.4.3 also addresses this issue.

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
k.	Establish guidance for Brunswick Training Unit observation and participation in industry activities, and incorporate this guidance into Nuclear Training Section procedures.	Leonard BTU	01/15/91	Complete	Guidance has been provided by a memorandum from the Manager, Nuclear Training Section. Procedure revision has been determined to be inappropriate for this type of management issue.
l.	Enhance the process for the identification and incorporation of needed changes to the simulator training process.	Leonard BTU	01/15/91	Complete	Process changes delayed to avoid impact on simulator certification submittal.
m.	Establish procedural guidance which provides direction for ensuring that simulator modifications are properly identified, and that appropriate training for these modifications is provided to licensed personnel.	Leonard BTU	01/15/91	Complete	
n.	Incorporate scheduling of training on Emergency Core Cooling System malfunctions and interlocks into appropriate documents.	Leonard BTU	01/15/91	Complete	Training on ECCS is incorporated in TI-201 for Hot License classes. TI-200 addresses ECCS training as a safety system topic. Current HLC and LOR attendees received training on ECCS malfunctions and interlocks within the past 9 months, as specified by these procedures.

*Indicates change from last month's report.

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BRUNSWICK NUCLEAR PROJECT
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IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	o. Develop a self-assessment process that will be used to increase the effectiveness of the training program, based on test results at the conclusion of each Hot License Class and each year's Licensed Operator Requalification, which will serve to identify weaknesses and changes needed in the LOR and HLC programs.	Leonard BTU	01/15/91	Complete	Criteria have been established by the Brunswick Training Unit to conduct comprehensive self-assessments. Instructors have been trained on methodology.
	p. Conduct an independent evaluation, prior to the 1990 examinations, using personnel who are not directly conducting training of the Licensed Operator Requalification examination readiness, and incorporate a requirement for the independent evaluations of the Licensed Operator Requalification and Hot License examination readiness into the Brunswick Training Instructions.	Leonard BTU	01/31/91	Complete*	This Action Item has been re-opened. An independent evaluation of LOR was completed by a contracted evaluator in 10/90, but the administrative requirement for independent evaluation was not formalized by procedure. Independent evaluations are scheduled or underway for 1991 HLC and LOR, and procedure revision will be completed by 04/30/91.

*Indicates change from last month's report.

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IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
q.	Develop a formal Simulator Scenario Writers's Guide for all phases of the Licensed Operator Requalification examination, to include guidelines for the development of more challenging scenarios into the Licensed Operator Requalification examination, and to identify equipment and training aides to be used in simulator training scenarios, and to include direction in the periodic use of video and audio equipment to allow the operators to become accustomed to them.	Leonard BTU	02/28/91	Complete	NTS AI-33, "Development of Licensed Operator Requalification Exam Material," was revised to incorporate guidance in this area.
r.	Develop self-assessment criteria that will be used to increase the effectiveness of the training program, based on test results at the conclusion of each Hot License Class and each year's Licensed Operator Requalification, which will serve to identify weaknesses and changes needed in the LOR and HLC programs. Implement the criteria in the appropriate unit and section training procedures.	Leonard BTU	03/29/91	Complete	See comment by "o."
s.	Implement scheduled improvements in operator training program procedures.	Leonard BTU	08/31/91	08/31/91	

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
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IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
E1	DEFINE, TRACK OPERATIONAL AND MANAGEMENT PERFORMANCE; DOCUMENT GOALS TO BE USED TO MANAGE PERFORMANCE	Starkey BNP	12/31/89	Complete	An Independent Review has been completed by Audit Services. This Action Item has been closed by the NRC, Report 91-06, dated 04/12/91.
E2	ENSURE IMPROVEMENT PROGRAMS ARE IMPLEMENTED/MONITORED	Starkey BNP	09/30/90	Complete	An Independent Review has been completed by Management Services. This Action Item has been closed by the NRC, Report 91-66, dated 04/12/91.
E3	REVISE LOR PROGRAM, EMPHASIZING EFFECTIVE CONTROL ROOM LOG ENTRIES	Leonard BTU	01/31/90	Complete	An Independent Review has been completed by BNP Site QA.
E4.1	ISSUE INTEGRATED AUDIT/SURVEILLANCE PLAN FOR BNP ENGINEERING	Banks CQAD	12/31/90	Complete	An Independent Review is underway by Audit Services. The NRC considers this Action Item "open."
E4.2	DEVELOP CORPORATE QA PERFORMANCE-BASED OVERVIEW PLAN	C. W. Crawford NAD	12/31/90	Complete	*An Independent Review is underway by Audit Services. Reportability for this Action Item has been transferred to Item E5. The NRC considers this Action Item "open."
E4.3	ADJUST AUDIT IMPROVEMENTS IN PROGRESS TO ADDRESS DET CONCLUSIONS	Banks CQAD	12/31/90	Complete	An Independent Review has been completed by Audit Services. The NRC considers this Action Item "open."

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
E5	ANALYZE METHODS OF INDEPENDENT ASSESSMENTS FOR PERFORMANCE EVALUATION	C. W. Crawford NAD	12/31/89	Complete	*An Independent Review is in progress by Audit Services. The NRC considers this Action Item "open."
	a. Select members for Project Quality Team to analyze nuclear evaluation and oversight functions.	Eury EVP	10/31/89	Complete	
	b. Gather data on industry evaluations and programs to incorporate best practices into Company programs.	Bowles/PQT CQAD	03/01/90	Complete	
	c. Identify desired changes in nuclear evaluation and oversight functions and attendant organizational structures.	Bowler/PQT CQAD	08/01/90	Complete	
	d. Implement desired changes in nuclear evaluation and oversight functions and attendant organizational structures.	Eury EVP	12/31/90	Complete	
E6	REVISE PT'S FOR PROPER EVALUATION OF SERVICE WATER PUMP PERFORMANCE	Moyer Operations	04/28/90	Complete	An Independent Review has been completed by BNP Site QA. This Action Item has been closed by the NRC, Report 90-32, dated 10/18/90.

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
F1	IMPLEMENT CAREER DEVELOPMENT AND JOB ROTATION PROCESS	Ferguson NHRSS	06/30/90	Complete	An Independent Review is underway by Management Services. Development of program recommendations for management review has required more time and effort than was originally anticipated.
F2	INCORPORATE QUALITY, SAFETY AND COST EFFECTIVENESS CRITERIA IN PERFORMANCE APPRAISAL PROGRAM	Starkey BNP	06/30/90	Complete	An Independent Review has been completed by Management Services.
F3	REVIEW AWARDS AND INCENTIVES, POSSIBILITIES AND DEVELOP IMPLEMENTATION PLAN FOR ENHANCEMENTS	Ferguson NHRSS	12/31/90	Complete	An Independent Review is underway by Management Services.
F4	PROVIDE FORMAL TRAINING IN BUSINESS FUNDAMENTALS	Simpson C&A	03/31/90	Complete	An Independent Review has been completed by Management Services.
G1	IMPLEMENT ACTIONS TO RESOLVE PEOPLE ISSUES, INCLUDING EMPLOYEE SUGGESTION SYSTEM	Simpson C&A	02/28/90	*Complete	*The CP&L employee suggestion system, called "Great Ideas At Work," was in place as of April 30, 1991. The first employee suggestion at Brunswick under this program was received on May 1, 1991. The NRC considers this Action Item "open."
	a. Establish a system for employees to make suggestions to management.	Simpson C&A	02/28/90	*Complete	

*Indicates change from last month's report.

BRUNSWICK NUCLEAR PROJECT
INTEGRATED ACTION PLAN STATUS: April 30, 1991

IAP NO.	ACTION ITEM	MANAGER	ORIGINAL DATE	TARGET DATE	COMMENTS
	b. Provide for effective follow-up by management to suggestions	Simpson C&A	02/28/90	*Complete	
	c. Ensure that cost-effectiveness is the key focus of the suggestion system.	Simpson C&A	02/28/91	*Complete	
G2	REEMPHASIZE AND ENCOURAGE SUPPORT OF TQ PROCESS	Simpson C&A	03/31/90	Complete	An Independent Review has been completed by Audit Services. This Action Item has been closed by the NRC, Report 90-37, dated 10/18/90.
G3	IMPROVE ORGANIZATIONAL AND INDIVIDUAL OWNERSHIP COMMITMENTS, INCLUDING: PROCEDURAL ADHERENCE IN OPERATIONS; AND ATTENTION TO DETAIL IN DESIGN ENGINEERING.	Moyer Operations Brown NED	03/31/90	Complete	An Independent Review is underway by Audit Services. Scope expanded to include Nuclear Engineering Dept. efforts in the area of engineering design. The NRC considers this Action Item "open."

*Indicates change from last month's report.

INTEGRATED ACTION PLAN
SCHEDULE OF INDEPENDENT ASSESSMENTS
April 30, 1991

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE	COMMENTS
A1	Communication Strategy for Goals, Priorities, Expectations	Audit Services	August 1990	Complete
A2	Improve External Relationships	Corporate QA	May 1990	Complete
B1	Implement Technical Support Improvements	Audit Services	May 1990 August 1990 March 1991	Complete
B2	Implement NED Organizational Improvements	Management Services	July 1990	Complete
B3	Implement Nuclear Training Organizational Improvements	Management Services	June 1991*	Underway
B4	Implement Control & Administration Organizational Improvements	Management Services	June 1991*	Underway
B5	Implement Nuclear Plant Support Organizational Improvements	Management Services	July 1990	Complete
B6	Implement Outage Management & Modifications Organizational Improvements	Audit Services	August 1990	Complete

* Indicates a change from previous month's report.

**Schedule subject to change based upon availability of resources and shifting priorities.

INTEGRATED ACTION PLAN
SCHEDULE OF INDEPENDENT ASSESSMENTS
April 30, 1991

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE	COMMENTS
B7	Construct Permanent Office Building	To be Determined	1993	
C1	Implement Corporate Nuclear Prioritization Process	Management Services	August 1990	Complete
C2	Establish NED Budget Item for Generic Work	Management Services	May 1990	Complete
C3	Establish Budget & Release Process for Non-IPBS Engineering	Management Services	April 1991	Complete*
C4	Develop Long Range Planning Budgets for Emerging Issues/ Regulations	Management Services	September 1990	Complete
D1	Resolve Surveillance Test Program Questions	Audit Services	July 1990	Complete
D2.1	Improve Management of Maintenance Backlog	Management Services	July 1990	Complete
D2.2	Strengthen Maintenance Planning Functions	Management Services	July 1990	Complete
D3	Fine Tune MOV Maintenance Program	On-Site Nuclear Assessment*	To be determined	On hold, pending CP&L's response to NRC questions

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INTEGRATED ACTION PLAN
SCHEDULE OF INDEPENDENT ASSESSMENTS
April 30, 1991

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE	COMMENTS
D4	Develop Post-Maintenance Testing for ASME Code Repairs	BNP Site QA	July 1990	Complete
D5	Implement Recommendations of HPCI Reliability-Centered Maintenance Study	On-Site Nuclear Assessment*	June 1991	
D6	Address Service Water System Design Issues	On-Site Nuclear Assessment*	May 1991	Underway*
D7	Confirm Design Basis for Key Brunswick Systems	On-Site Nuclear Assessment*	1994	
D8	Complete Update of Corporate and Site Design Procedures	Audit Services	May 1990	Complete
D9	Implement Corrective Action Program Improvements	On-Site Nuclear Assessment*	April 1991	Complete*
D10	Develop and Institutionalize Corporate Corrective Action Program	On-Site Nuclear Assessment*	April 1991	Complete*
D11	Develop Corporate Program for Consistent Performance of Safety Reviews	BNP Site QA	December 1990	Complete

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INTEGRATED ACTION PLAN
SCHEDULE OF INDEPENDENT ASSESSMENTS
April 30, 1991

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE	COMMENTS
D12	Improve Business Planning Process	Management Services	August 1990	Complete
D13	Review BNP Procedures for Compliance with PAM Intent	Audit Services	May 1990	Complete
D14	Improve Consistency of Procurement Processes by Nuclear Plants	Management Services	June 1991*	Underway
D15	Require Nuclear Services Department Involvement in Regulatory Modifications	Management Services	February 1991	Complete
D16.1	Increase Role of Nuclear Plant Support in Development of Consistency among Nuclear Plants	Management Services	June 1990	Complete
D16.2	Formalize Initiatives to Standardize Processes and Procedures	Management Services	July 1990	Complete
D17	Increase Use of ISD's Directives and Resources	Management Services	May 1990	Complete

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INTEGRATED ACTION PLAN
SCHEDULE OF INDEPENDENT ASSESSMENTS
April 30, 1991

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW/ BY	APPROXIMATE SCHEDULE	COMMENTS
D18	Submit Simulator Certification	On-Site Nuclear Assessment*	May 1991	Underway*
D19.1	Implement System for Responding to Training Requests	Management Services	June 1991*	Underway
D19.2	Provide Coordinated Response to Regulatory-related Training Requests	Management Services	June 1991*	Underway
D20	Revise Standing Instructions Procedure to Require Index Log	Corporate QA	May 1990	Complete
D21	Review SWFCG Charter/Guides for Current Goals, Priorities	Management Services	August 1990	Complete
D22	Implement Tagging and Labeling Improvement Program	Audit Services	May 1990	Complete
D23	Integrate PM Vibration Program with ASME Sec. XI IST Program	On-Site Nuclear Assessment*	November 1991*	
D24	Implement Budgeting of Small Engineering Support Projects	Management Services	May 1990	Complete

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INTEGRATED ACTION PLAN
SCHEDULE OF INDEPENDENT ASSESSMENTS
April 30, 1991

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE	COMMENTS
D25	Use Project Management Approach in Planning/Execution of Outages	Audit Services	August 1990	Complete
D26	Formalize Plant Work Schedule Adherence Control	Management Services	June 1990	Complete
D27	Improve Tracking/Disposition of Temporary Repairs/Conditions to Expedite Elimination	BNP Site QA	July 1990	Complete
D28	Revise EOPs to Simplify and Match BWROG Guidelines	On-Site Nuclear Assessment*	April 1991*	Complete*
D29	Implement NGG Guideline Re: Structure of CP&L ISI Programs, and Establishment of 6-Month Information Exchanges	BNP Site QA	August 1990	Complete
D30	Implement Actions for Administrative Cost Containment	Management Services	August 1990	Complete

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INTEGRATED ACTION PLAN SCHEDULE OF INDEPENDENT ASSESSMENTS April 30, 1991				
IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE	COMMENTS
D31	Consolidate, Update, Simplify BNP Procedures	Audit Services	March 1991	Complete
D32	Implement Brunswick Nuclear Project Department Licensed Operator Training Improvements	To be determined		
D33	Implement Nuclear Services Department Licensed Operator Training Improvements	To be determined		
E1	Define, Track Operational and Management Performance; Document Goals to be Used to Manage Performance	Audit Services	August 1990	Complete
E2	Ensure Improvement Programs Are Implemented/Monitored	Management Services	August 1990	Complete
E3	Revise LOR Program, Emphasizing Effective Control Room Log Entries	BNP Site QA	July 1990	Complete
E4.1	Issue Integrated Audit/Surveillance Plan for BNP Engineering	Audit Services	May 1991	Underway

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INTEGRATED ACTION PLAN
SCHEDULE OF INDEPENDENT ASSESSMENTS
April 30, 1991

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE	COMMENTS
E4.2	Develop Corporate QA Performance- Based Overview Plan	Audit Services	May 1991	Underway
E4.3	Adjust Audit Improvements in Progress to Address DET Conclusions	Audit Services	August 1990	Complete
E5	Analyze Methods of Independent Assessments for Performance Evaluation	Audit Services	May 1991*	Underway*
E6	Revise PTs for Proper Evaluation of Service Water Pump Performance	BNP Site QA	July 1990	Complete
F1	Implement Career Development and Job Rotation Process	Management Services	June 1991*	Underway
F2	Incorporate Quality, Safety and Cost Effectiveness Criteria in Performance Appraisal Program	Management Services	August 1990	Complete
F3	Review Awards and Incentives; Develop Plans for Enhancements	Management Services	June 1991*	Underway

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INTEGRATED ACTION PLAN
SCHEDULE OF INDEPENDENT ASSESSMENTS
April 30, 1991

IAP NO.	DESCRIPTION	INDEPENDENT REVIEW BY	APPROXIMATE SCHEDULE	COMMENTS
F4	Provide Formal Training in Business Fundamentals	Management Services	July 1990	Complete
G1	Implement Actions to Resolve People Issues, Including Employee Suggestion System	Audit Services	May 1991	Revised due to change in completion date of Action Item.
G2	Reemphasize and Encourage Support of TQ Process	Audit Services	August 1990	Complete
G3	Improve Organizational and Individual Ownership Commitments, Including Procedural Adherence	Audit Services	May 1991	Underway

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