

50-324



Carolina Power & Light Company

File: NG-3513 (B)
2630 (B)

August 24, 1979

Serial: OQA-79-174

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 & 2
LICENSE NOS. DPR-62 AND DPR-71
DOCKET NOS. 50-324 AND 50-325
SUPPLEMENTAL RESPONSE TO I&E INSPECTION REPORT 79-02

Dear Mr. O'Reilly:

Following receipt of I&E Inspection Report 324-325/79-02, we responded in Carolina Power & Light letter, Serial GD-79-654 dated March 14, 1979, providing you with our planned corrective actions. In some cases, as work was performed in execution of the planned corrective actions, alternate courses of action were identified which would better implement the regulatory requirements. Such changes in planned corrective action and any attendant schedule changes have been communicated to you in supplemental responses, Serial No. OQA-79-73 dated April 20, 1979, and Serial No. GD-79-1967 dated August 1, 1979.

The purpose of this supplemental response is to again provide you with details of changes to improve our planned corrective action, to provide some editorial corrections and, further, to request your concurrence in our proposed revision to several previously established completion dates. The revised completion dates are justified for several reasons:

- . change in approach to committed corrective actions,
- . significant increase in the demands placed upon our staff in responding to numerous I&E Bulletins issued in recent months as a result of the Three Mile Island accident, and
- . significant increase in the demands placed upon our staff in responding to the generic problems identified in seismic analysis of piping and supports.

The actions proposed in this letter were discussed with Mr. W. A. Ruhlman of your office during his follow-up inspection conducted August 6-9, 1979.

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Infraction

Appendix A, Item A, (324-325/79-02-04), Failure to establish controls for handling, storage, and preservation of materials as required by the accepted QA Program.

Carolina Power & Light Company's response to this item stated, in part:

A review of AI-1 (Material Requisition, Receiving and Storage) is presently in progress to identify in detail where it fails to meet the requirements of ANSI N45.2.2-1972. AI-1 will be rewritten along with additional procedures as necessary by June 15, 1979. A training program will be implemented to retrain plant Stores personnel on these new procedures. The training of all Stores personnel in their respective jobs will be completed by July 15, 1979.

As we progressed with our review of the warehousing program, it became apparent that the most effective way to fully implement the requirements of the Quality Assurance Program was to delete rather than rewrite AI-1 (Material Requisition, Receiving, and Storage). In place of AI-1, the following instructions were developed:

Storekeeper Instruction: SK-1	Material Requisition and Reorder Procedures and Responsibilities
Storekeeper Instruction: SK-2	Receiving
Storekeeper Instruction: SK-3	Storage
Storekeeper Instruction: SK-4	Issuing of Materials and Tools
Storekeeper Instruction: SK-5	Packaging of Q-list Items
Storekeeper Instruction: SK-6	Handling
Storekeeper Instruction: SK-7	Shipping
Storekeeper Instruction: SK-8	Housekeeping
Training Instruction: TI-501	Storekeeper Training

These instructions were reviewed by Mr. Ruhlman.

Items 2(a) and 2(b) of our response stated:

(2) Warehouse C

- (a) Warehouse C is under control of Radiation Control and Test and is not at present a part of Stores Warehousing. The bay in question is used by Maintenance along with three other bays. The Q-list parts have had QA Hold Tags attached until disposition is determined, and a lock has been attached to this bay under Maintenance control. The future use of Warehouse C will be considered in the Corporate Materials Management Section Study addressed in the text of Item A response.

- (b) All four bays used by Maintenance have been locked and the keys are under Maintenance control. See Item (a) above for further information.

These statements were incorrect as far as the number of bays used by maintenance are concerned and should have read:

(2) Warehouse C

- (a) Warehouse C is under control of Radiation Control and Test and is not at present a part of Stores Warehousing. The bay in question is used by Maintenance along with one other bay. The Q-list parts have had QA Hold Tags attached until disposition is determined, and a lock has been attached to this bay under Maintenance control. The future use of Warehouse C will be considered in the Corporate Materials Management Section Study addressed in the text of Item A response.
- (b) Both bays used by Maintenance have been locked and the keys are under Maintenance Control.

Infraction

Appendix A, Item B, (324-325/79-02-08), Failure to establish an adequate housekeeping program.

CP&L's response to this item stated:

With respect to ANSI N45.2.3-1973:

A complete review of ANSI N45.2.3-1973 is underway by the plant staff and the necessary controls will be implemented as dictated by this review. The review shall be completed and controls implemented by September 1, 1979.

CP&L requests revision of September 1, 1979 completion date to December 31, 1979 for reasons previously discussed.

Infraction

Appendix A, Item D, (324-325/79-02-05), Failure to have a program for the identification and control of items with limited shelf-life.

CP&L's response to this item stated:

Procurement of spare parts has been computerized and provides means for identifying shelf-life. However, this phase of the computerized program has not been fully implemented. Until such time,

procedures to provide identification and control of shelf-life items will be developed which is presently in progress. The procedures will be completed by June 15, 1979. Full implementation of the program to control shelf-life will be implemented by August 31, 1979. The questions raised concerning segregation of items will be addressed in the study addressed in our response to Item A.

CP&L requests revision of the August 31, 1979 date for full implementation of the shelf-life control program due to difficulties being encountered in determining the shelf-life of items already on site and for reasons previously discussed. We propose full implementation by December 31, 1979.

Infraction

Appendix A, Item E, (324-325/79-02-10), Failure to have or follow procedures for calibration of safety-related lab instruments.

CP&L's response to this item stated in part:

Section 13 "Calibration Program" of the CP&L Radiation Control and Protection Manual will be deleted and instruments shall be calibrated as required in the Corporate Quality Assurance Program as discussed above. This action will be accomplished prior to June 30, 1979.

Safety-related lab instruments are now calibrated in accordance with the Corporate Quality Assurance Program. Deletion of Section 13, "Calibration Program", of the CP&L Radiation Control and Protection Manual is, however, not desirable as this Section will be used for calibration of nonsafety-related lab instruments. Therefore, the above paragraph should be restated as follows:

Section 13, "Calibration Program, of the CP&L Radiation Control and Protection Manual will be utilized for nonsafety-related instruments only. Safety-related instruments shall be calibrated as required in the Corporate Quality Assurance Program as discussed above.

Deficiency

Appendix A, Item J, (324-325/79-02-07), Failure to have records of the bases for determination that a change or modification does not involve an unreviewed safety question as required by 10CFR50.59(b).

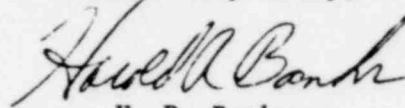
CP&L's response to this item stated:

The plant modification procedure in existence at the time of the inspection required written bases only in those instances when the change did involve an unresolved safety question. Revisions to this procedure approved on February 9, 1979, require written bases on all modification packages. All modification packages developed after February 9, 1979, will include written bases concerning unresolved safety questions.

CP&L wishes to correct the editorial error above in that the underscored words should read "unreviewed safety question."

It is believed that the restatements above clarify our responses previously submitted and will improve our implementation of programs to ensure compliance with regulatory requirements.

Yours very truly,



H. R. Banks
Manager
Nuclear Generation

CER:MBW:cp

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