

**CP&L**

Carolina Power & Light Company

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Brunswick Steam Electric Plant  
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May 12, 1980

FILE: B09-13514

SERIAL: BSEP/80-837

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-71 AND DPR-62  
DOCKET NOS. 50-325 AND 50-324  
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant has received IE Inspection Report 50-324/ 80-10 and 50-325/80-11 and finds that it does not contain any information of a proprietary nature.

The report identified two items that appear to be in noncompliance with NRC requirements and one item that appears to deviate from commitments made to the Commission. These items and Carolina Power & Light Company's response to each are addressed in the following text:

Infraction:

As required by Sections 6.8.1.c and 6.8.1.f of the Technical Specifications written procedures shall be established, implemented, and maintained covering the surveillance and test activities of safety related equipment and fire protection program implementation.

Contrary to the above, the surveillance test procedures for the fire protection systems (PT-35.7, Sprinkler and Deluge Systems) do not include a visual inspection for all of the control valves in the fire protection systems required by Technical Specification Section 4.7.7.1.1.c; Surveillance test/inspection procedure is not provided for an inspection of the diesel engine for the diesel

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driven fire pump required by Technical Specification Section 4.7.7.1.2.c; and, Surveillance test/inspection procedures are not provided for inspection of all fire barrier penetrations (primarily fire dampers in duct penetrations) required by Technical Specification Section 4.7.8.

Carolina Power & Light Company's Response:

PT 35.1, Fire Protection System, and PT 35.7, Sprinkler and Deluge Systems, are designed to meet the surveillance requirements of Technical Specification 4.7.7.1.1.c. All valves required to be inspected by Technical Specification 4.7.7.1.1.c have been included in PT 35.7 in a revision dated April 23, 1980.

The requisite inspection on the diesel engine was performed by the manufacturer's representative in accordance with the manufacturer's technical manual in April 1980. Although a periodic test to satisfy the requirement of section 4.7.7.1.2.c was not met, the intent of the specification was. A periodic test to satisfy this requirement is scheduled for completion by July 1, 1980.

Until early 1979, fire doors and dampers were not considered as being included in Technical Specification 4.7.8 requirements, only cable penetrations. At that time, in reviewing the fire protection program, the plant fire protection engineer recognized this deficiency and in February 1979 issued a revision to FP-8 identifying doors and dampers as fire barrier penetration seals and specifying controls for maintenance and repair. Periodic tests have been developed and implemented on the fire doors, and mapping of the fire dampers and penetrations is in progress. This mapping and indexing of dampers and penetrations is necessary to develop an accurate and dependable periodic test. The mapping is scheduled for completion in July 1980, and the development of periodic test from this mapping will be complete by October 31, 1980.

Additional personnel resources have been added to the procedure development/revision effort to assist in bringing the required procedures up to date with the actual plant status upon completion of the numerous plant modifications. Increased emphasis has been placed on the administrative controls area by all levels of plant management.

Infraction:

As required by section 6.5.1.6.e of the Technical Specifications, the Plant Nuclear Safety Committee (PNSC) shall be responsible for investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager of Nuclear Generation and the Manager-Corporate Nuclear Safety Section.

Contrary to the above, the record data for the inspection and test of the fire detection systems in the service water intake structure and control building scheduled for May 1979 is not available. The plant staff was advised by NRC Inspection Report Nos. 50-324/80-79-28 and 50-325/79-29 dated September 19, 1979, that data was not available but a review of this technical specification violation was not made by the PNSC.

Carolina Power & Light Company's Response:

When an investigation by plant Quality Assurance personnel revealed that PT 35.4.5 for May 1979, was not in the vault, an investigation was begun by the fire protection engineer. Discussions with plant personnel responsible for performing this PT as well as a review of informal records of periodic test scheduling maintained by the fire protection engineer indicated that the test was performed but that the documentation had apparently been misplaced in the review cycle. Since this item was reported as an inspector follow-up item on Inspection Report 50-324/79-28 and 50-325/79-29 and since it is felt that the periodic test had been performed, we did not view this event as a Technical Specifications violation. PNSC will review this event by May 31, 1980, for failure to maintain records and data. This event has led to reassessment of what constitutes Technical Specifications violations and further events of this nature should not occur.

Deviation:

Section IV.C.3.c of the Fire Protection Program review of January 1, 1977, states in part that the sprinkler systems provided meet the criteria of National Fire Protection Association Standard 13 (NFPA-13), Sprinkler System.

Contrary to the above, the water flow alarms for the deluge sprinkler systems to the standby gas treatment filters do not meet the criteria of NFPA-13 due to the following:

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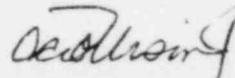
1. The water flow alarm devices can not be properly tested except by a full flow test or operational test of each deluge valve. Sections 3-17.3.3 and 3-17.4.4 of NFPA-13 require alarm devices for sprinkler systems to be equipped with a test connection which takes water from the supply side of the deluge valve.
2. The control valves in the supply piping to the alarm devices are not of the type which clearly indicate if the valves are open or closed and are not constructed so that they may be locked or sealed in the open position as required by Section 3-17.4.5 of NFPA-13.

Carolina Power & Light Company's Response:

Based on NFPA-13 Section 3.17.2, only those sprinklers having twenty or more sprinkler heads are required to have water flow alarm devices. Since the sprinkler systems cited have only nine heads each, no water flow alarm device is required; and, therefore, the provisions of 3-17.3.3, 3-17.4.4, and 3-17.4.5 do not apply in this application.

However, we feel that if the pertinent sections of NFPA-13 did apply, the existing installation meets the intent of the code with regard to the fact that the water flow alarm device can be tested in operation under conditions closely approximating the flow conditions existing on a valid system activation. Additionally, the valves installed can be sealed in position, and, although they do not clearly indicate their position, this deviation was found acceptable by NRR with respect to certain other system valves.

Very truly yours,



A. C. Tollison, Jr., General Manager  
Brunswick Steam Electric Plant

RMP/REP/bd

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