



Carolina Power & Light Company

March 20, 1981

MAR 24 A 7. 53

FILE: NG-3513(B)

SERIAL: NO-81-476

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKETS NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REVISED RESPONSE TO NOTICE OF VIOLATIONS

Dear Mr. O'Reilly:

On February 18, 1981, Carolina Power & Light Company (CP&L) was contacted by members of your staff, Mr. A. Belisle and Mr. C. Upright, concerning their questions regarding CP&L's response to IE Inspection Report No. 50-325/80-42 and 50-324/80-39, Violation K. During these conversations with Mr. J. Hammond and Mr. D. Stadler of the CP&L staff, it was indicated that the initial response did not make it clear if the violation was denied or accepted. It was agreed by my staff to submit a clarification to that response to Violation K. Attached you will find our revised response to Violation K. If you have any further questions, please contact my staff.

Yours very truly,

B. J. Furr
Vice President
Nuclear Operations Department

DCS:ejj*

Attachment

Sworn to and subscribed before me this 19th day of March, 1981.

Margaret L. Sparks
Notary Public

My Commission expires: 6/5/84

8104220 899

Revised Response
IE Report No. 50-325/80-42 and 50-324/80-39, Violation K

Violation K:

Technical Specification 6.5.3.3.a requires that the Corporate Nuclear Safety Unit (CNSU) review the safety analysis of modifications in the facility as described in the FSAR.

Contrary to the above, the CNSU did not review the safety analysis for plant modification 79-57 which required an FSAR change.

Carolina Power & Light Company Response:

It is agreed that the failure to review plant modification 79-57 in a timely manner constitutes a violation of Technical Specification 6.5.3.3.a. Even though the modification package had been requested from the plant, an unduly long time had elapsed without the item being received. In that the request was not actively pursued, it is unlikely that the failure to reply would have been noted and action completed except via audit.

It is not felt that this particular item is indicative of weakness in the overall CNS program for follow-up and resolution of concerns, recommendations, or open review items. Nonetheless, it is a failure to administratively carry out the Technical Specification requirements. CNS has a formal follow-up system as defined in instruction CNSI-4, "Review, Documentation, and Communication." This system has proved to be an effective means of tracking open items and calls for a periodic review of status. In the future, safety analyses which CNS identifies as requiring review will be followed up via the CNSI-4 system and pursued more aggressively to completion. In conjunction with the following actions it is felt that future problems of this nature will be eliminated.

The modification which was the subject of this violation was received November 11, 1980, and the independent review was completed on November 20, 1980.

In addition to the above corrective actions the following changes were made at the Brunswick Plant.

Plant Engineering Procedure ENP-3 provides instructions on obtaining the required CNS review of plant modifications that revise the FSAR; however, it did not provide an adequate method or instructions to assure the documentation of this review was made a part of the modification package. ENP-3 has been revised (Revision 12) to include a sign-off verifying that a CNS review has been performed where required and that documentation of this review is contained in the modification package. Also, training classes on ENP-3 have recently been conducted with plant engineering personnel with emphasis placed on this required review. Full compliance has been achieved on this item.