



Carolina Power & Light Company

Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461-0429

August 19, 1983

FILE: B09-13510C
SERIAL: BSEP/83-2705

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 & 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 324/83-20 and 325/83-20 and finds that it does not contain any information of a proprietary nature.

The report identified three items that appear to be in noncompliance with NRC requirements. These items and Carolina Power & Light Company's response to each are addressed in the following text:

Violation A (Severity Level V)

10CFR50.72(a)(6)(iii) requires "each licensee to notify the NRC Operations Center as soon as possible and in all cases within one hour by telephone of a personnel error which prevents or could prevent, by itself, the fulfillment of a safety function of systems, and components important to safety that are needed to limit the release of radioactive material to acceptable levels or reduce the potential for such a release.

Contrary to the above, notification to the NRC was not made within one hour of reportable events in that, on May 10, 1983, at 0400, the licensee determined that SJAE radiation monitors were inoperable because they were isolated from the process flow. The event was reported to the NRC at 0730. A period of 3.5 hours had elapsed.

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Response to Violation A

1. Admission or Denial of the Alleged Violation

Carolina Power & Light Company (CP&L) admits the violation occurred as stated.

2. Reason for Violation

This violation resulted from the failure by shift operating personnel to promptly identify that the inoperability of the SJAE radiation monitor was reportable per 10CFR72(a)(6)(iii).

3. Corrective Action Taken

A memorandum was issued on August 1, 1983, to all BSEP licensed operators and Shift Technical Advisors (STAs). The memorandum reiterated the need to evaluate events at the plant against the reporting requirements of 10CFR72 within one hour. Additionally, a standard operating practice was issued on June 2, 1983, outlining the duties of the STA. Part of these duties include an independent assessment of information including 10CFR50.72 evaluations.

4. Actions to be Taken

None required.

5. Date for Full Compliance

Full compliance was achieved on August 2, 1983.

Violation B (Severity Level V)

Technical Specification 6.8.1a requires that written procedures be implemented that meet the requirements of Appendix A of Regulatory Guide 1.33, November 1972. Administrative Procedure Sections 5.3.2 and 5.5.2 establish these requirements with respect to procedure adherence and change control.

Contrary to the above, as of May 25, 1983, Administrative Procedure had not been implemented in that the position of some stem leakoff valves for the Residual Heat Removal System was changed from open to shut in Operating Procedure 17-V, without initiating either a temporary or permanent procedure change.

Response to Violation B

1. Admission or Denial of the Alleged Violation

CP&L admits the violation occurred as stated.

2. Reason for Violation

This violation resulted from the failure of plant personnel to recognize that changes to system valve lineups are deviations from procedures. This resulted from the fact that the procedure GP-01 permitted the deviations and the valve alignments were specified in GP-01.

3. Corrective Action Taken

A new procedure, OI-13, entitled Valve and Breaker Position, was issued on August 2, 1983. This procedure requires that all valves/breakers be in the position required by the valve lineup with the exceptions of those under clearance or positioned to support a plant evolution. When a valve is out of position from that specified by the system valve lineup, it will be placed on an exception form which is approved by the Shift Foreman. Additionally, these exception forms will be reviewed prior to each unit startup.

A review has been completed of safety system valve lineups to identify any valve not in position required by the system valve lineup. Where a discrepancy was identified, the discrepancy was reviewed as to its impact on safety. No valve discrepancies were identified which compromised safety. Additionally, changes to the applicable procedures were processed to bring actual system valve alignments and the procedural valve alignments into agreement.

4. Corrective Actions to be Taken

None required.

5. Date for Full Compliance

Corrective actions have been completed; therefore, full compliance has been achieved.

Violation C (Severity Level V)

Technical Specification 6.8.1a requires written procedures be established for activities recommended in Appendix A of Regulatory Guide 1.33, November 1972. Item H.2 of Appendix A requires specific procedures for surveillance tests listed in technical specifications. Technical Specification 4.3.2.2 requires a logic system functional surveillance test of the main steam line radiation monitor. Footnote d, of Technical Specification Table 3.3.2.1, indicates that the radiation monitor trips the mechanical vacuum pumps. No specific procedure is provided for testing that the mechanical vacuum pumps will trip on main steam line monitor high radiation isolation signal.

Response to Violation C

1. Admission or Denial of Alleged Violation

CP&L admits that the violation occurred as stated. However, although no procedure existed to functionally verify the main steam line high radiation trip of the mechanical vacuum pumps, the relay contact used to provide the trip signal to the mechanical vacuum pumps was being checked on a weekly basis by PT-01.1.12P.

2. Reason for Violation

The violation was apparently the result of an oversight during the preparation of the surveillance procedure. A contributory factor to this oversight was the inclusion of the footnote d in Technical Specification Table 3.3.2-1 (the LCO table) instead of Table 4.3.2-1 (the surveillance table).

3. Actions Taken

The operability of the mechanical vacuum pump trip on main steam line high radiation was promptly verified on Unit No. 2 using Special Procedure 83-047. A permanent procedure, PT-02.2.5, has been written, approved, and is included in the plant surveillance testing scheduling program. The procedure, PT-02.2.5, was satisfactorily performed on Unit No. 1 prior to restart from the 1982-1983 refueling outage. A review of both units' technical specifications was conducted to determine if similar requirements are "concealed" in the footnotes. This review did not indicate additional instances where surveillance requirements are "concealed" in the footnotes.

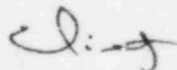
4. Actions to be Taken

None required.

5. Date for Full Compliance

Full compliance has been achieved.

Very truly yours,



C. R. Dietz, General Manager
Brunswick Steam Electric Plant

TEC/shb/LETSB2

cc: Mr. R. C. DeYoung
NRC Document Control Desk