CP&L UNITE REGIS

Carolina Power & Light Company

APR 23 A8: 53

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

April 20, 1982

FILE: B09-13514 SERIAL: BSEP/82-846

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

> BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 LICENSE NOS. DPR-71 AND DPR-62 DOCKET NOS. 50-325 AND 50-324 REPORT OF 10CFR21

Dear Mr. O'Reilly:

It has been determined, through our QA program, that material may not always have been purchased in accordance with the applicable specifications. It is possible that replacement components could have been installed that did not meet the applicable specifications. The following problems have been identified:

- a. The procurement program allows pipe and fittings to be purchased as ASME Class II; however, there is an apparent lack of control over the issuance and use of this material. Therefore, it is possible to install Class II pipe and fittings into a Class I system. The specification for Class I pipe and fittings requires the submittal of documentation over and above that required for Class II. Therefore, it is believed that the necessary documentation is not available at present to support the use of Class II in Class I applications.
- b. Items such as pressure switches have been purchased in some cases as off-the-shelf and in other cases purchased to a specification. This situation has the potential for the specification not being met and a Class II item being installed in a Class I application.

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Mr. James P. O'Reilly -2-April 20, 1982 A 10CFR21 evaluation on April 15, 1982, concluded that the potential existed for unanalyzed accidents which could result in a substantial safety hazard. The Vice President - Nuclear Operations was informed, and the USNRC was notified by telephone on April 16, 1982. A corrective action plan was initiated on April 16, 1982. An item of nonconformance was established against those Q-list materials which could be identified as part of the problem. A task force was organized to determine the classifications of suspect components in stock and to implement an engineering evaluation when appropriate to assess the specifications applicable to those components. A review of past procurement and installation practices has been set in motion. In addition, On-site Nuclear Safety is assisting in determining the safety significance for continued plant operation. To date, no known failures have occurred to components which may be suspect. It is highly improbable that a significant safety problem actually exists. The problem appears to be documentation oriented rather than material related. A preliminary review of past installation practices has concluded that the specifications for ASME Class 1 piping have not been violated. This is based upon the fact that piping changes to Class 1 systems have been completed by approved plant modifications which involve the proper specification for the replacement components. The full extent of the problem is being further explored. A supplemental report regarding the task force findings will be submitted when that information becomes available. Very truly yours, Cling C. R. Dietz, General Manager Brunswick Steam Electric Plant DEN/gvc cc: Mr. V. Stello, Jr.