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**CP&L**

Carolina Power & Light Company

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

August 26, 1982

FILE: B09-13510E  
SERIAL: BSEP/82-1873

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 NO. 1  
DOCKET NO. 50-325  
LICENSE NO. DPR-71  
SUPPLEMENTAL RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 50-324/82-16 and 50-325/82-16 and finds that it does not contain any information of a proprietary nature. As discussed with Mr. C. W. Burger, this submittal revises our response to Violation A on failure to have a trending system.

Violation A (Severity Level IV):

10CFR50, Appendix B, Criterion II, requires that the applicant establish a quality assurance program which shall be documented by written procedures. The accepted quality assurance program (letter dated March 18, 1981, Serial OQA-81-026) states that Brunswick plant complies with the requirements for administrative controls described in ANSI N18.7-1976. ANSI N18.7-1976 requires, in paragraphs 4.1 and 5.2.7.1, that actions be taken to detect trends and review failed equipment and components to determine whether a replacement component of the same type can be expected to perform its function reliably.

Contrary to the above, actions have not been taken as of May 21, 1982, to establish a system to detect trends and review failed equipment.

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### Carolina Power & Light Company's Response

Carolina Power & Light Company acknowledges that a system to detect trends and review failed equipment had not been established at the Brunswick site as of May 21, 1982. Several activities exist at the plant specifically related to trend analysis, but these activities have not been incorporated into a formal program defining the scope and responsibilities for trend analysis.

The on-site Nuclear Review Group reviews LERs and provides comments to the plant staff on specific failures. The Corporate Nuclear Safety Section reviews LERs and issues a bimonthly LER Trend Analysis Report.

The Shift Technical Advisors are responsible for reviewing and evaluating operating experience for detecting failure trends. The Shift Technical Advisors review the following items in meeting this responsibility:

1. BSEP LERs
2. Q-list Trouble Tickets
3. NPRD Reports
4. Technical Specification Revisions
5. Operating Manual Revisions
6. Operating Experience Reports
7. Scram/Incident Reports
8. Plant Modifications

Trend analysis is also provided through inherent responsibilities of the plant organization. A Maintenance Foreman and Maintenance Planner/Analyst are assigned responsibilities for designated areas or specific groups of systems. The Planner/Analyst maintains the maintenance history file for the equipment in his area of assignment and in conjunction with the Maintenance Foreman functionally performs a trend analysis for their assigned equipment. An Engineering Work Request is available and used to obtain plant Engineering assistance in reviewing repeated failed equipment or to recommend design changes.

A formal program for detecting trends and reviewing failed equipment will be established and implemented by November, 1982.

### Violation B (Security Level IV):

Technical Specification 6.8.1 requires that procedures identified in Appendix A of Regulatory Guide 1.33, November 1972 be established and implemented. Section H of Appendix A requires procedures to assure that safety-related instruments are properly calibrated at specified intervals to maintain accuracy. Technical Specification 4.7.7.1.2.a.1 requires verification at least each 31 days that the fuel storage tank for the fire pump diesel engine contains at least 500 gallons of diesel fuel.

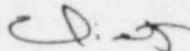
Contrary to the above, a procedure has not been established to calibrate the level instrument (2-FP-LI-6194) used to periodically verify the quantity of diesel fuel in the storage tank.

Carolina Power & Light Company's Response

Carolina Power & Light acknowledges that this is a violation of NRC requirements. A review of the listing of fire protection instrumentation requiring calibration provided to the Instrumentation & Control (I&C) group by the Fire Protection group did not include this level switch; therefore, I&C had not established a procedure to calibrate this instrument.

Upon notification during the subject inspection, I&C reviewed the level instrument and its associated technical documentation. It has been determined by I&C that the instrument being used to determine the diesel driven fire pump oil tank level cannot be calibrated due to its design. The only test that can be performed on this instrument is an operability check, i.e., drain and fill the tank (or portions of the tank) and verify that the level instrument accurately tracks level. The Fire Support group has been tasked to develop a test to ensure the operability of the level instrument is checked or to replace the instrument with one that can be calibrated by I&C. This will be done by September 30, 1982.

Very truly yours,



C. R. Dietz, General Manager  
Brunswick Steam Electric Plant RMP/gvc

Enclosure

cc: Mr. R. C. DeYoung