

July 19, 1982

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light  
Brunswick 1 and 2

Docket Nos. 50-324, 50-325  
License Nos. DPR-62, DPR-71

As a result of the inspection conducted on June 15-18, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification Surveillance requirement 4.0.5 requires that in-service testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code...ASME Section XI, paragraph IWP-3111 requires that when reference values may have been affected by repair or routine servicing of a pump a new reference value shall be established within 96 hours after return of the pump to normal service.

Contrary to the above, the requirement to reestablish reference values after repair operations was not met in that RHR Pump 1D was modified in January 1982 and new reference data was not established until April 5, 1982.

The above violation applies to Unit 1 only.

This is a Severity Level IV Violation (Supplement I).

- B. Technical Specification Surveillance Requirement 4.0.5 requires that ASME Code Class 1, 2 and 3 components be in-service inspected until commercial operation in accordance with ASME B&PV Code Section XI 1974 Edition and Addenda through Winter 1975; and that after commercial operation the inspections be conducted in accordance with the applicable Edition of Section XI required by 10 CFR 50.55(a). ASME section XI 1974 edition specified that for plants built to piping standards other than ASME, Reg. Guide 1.26 was to be used to establish the quality standards equivalent to ASME Code Class 2 and 3. Reg. Guide 1.26 specifies that for boiling water plants the main steam lines between the containment isolation valve and the turbine stop valve should be considered Quality Group B. Equivalent to ASME Class 2.

Contrary to the above, the requirement to classify the main steam as equivalent to ASME Class 2 was not met in that the ISI Programs for both Brunswick units excluded the main steam lines from the Class 2 inspection requirements.

This is a Severity Level V Violation (Supplement I).

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Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: July 19, 1982