



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

Report Nos. 50-324/82-23 and 50-325/82-23

Licensee: Carolina Power and Light Company
411 Fayetteville Street
Raleigh, NC 27602

Facility Name: Brunswick

Docket Nos. 50-325 and 50-324

License Nos. DPR-62 and DPR-71

Inspection at Brunswick site near Southport, NC

Inspector: E.A. Gerard for 7/15/82
J. J. Blake Date Signed

Approved by: E.A. Gerard for 7/15/82
N. Economos, Acting Section Chief Date Signed
Engineering Inspection Branch
Division of Engineering and Technical Programs

SUMMARY

Inspection on June 15-18 1982.

Areas Inspected:

This routine unannounced inspection involved 26 inspector-hours on site in the areas of licensee action on previous inspection findings, Generic Letter 81-34, IE Bulletin follow-up, inservice inspection program and inspector follow-up items.

Results:

Of the five areas inspected, no violations or deviations were identified in three areas; two violations were found in two areas (Failure to Include Main Steam Piping in the ISI Program - paragraph 7; and Failure to Re-establish Baseline Data for RHR SW Pump 1D After Maintenance Activities - paragraph 3). No deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *C. R. Dietz, Plant Manager
- *G. Thompson, Project Engineer
- *F. R. Coburn, QA Manager
- *R. M. Poulk, Jr., Regulatory Specialist
- A. Egap, Inservice Inspection Coordinator
- J. Titrington, NSSS Engineer

NRC Resident Inspectors

- D. Myers, SRI
- *L. W. Garner, RI

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on June 18, 1982, with those persons indicated in paragraph 1 above. The inspector reviewed the violations in detail. The licensee offered no comment on the violations. The items discussed were as follows:

- a. Violation (50-324, 325/82-23-01) - Failure to Include Main Steam Piping in ISI Inspection Program, paragraph 7.
- b. Violation (50-325/82-23-02) - Failure to Re-establish Baseline Data for RHR SW Pump 1 D After Maintenance Activities, paragraph 3.

3. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (325/82-11-05)-Failure to establish baseline data after RHR SW pump impeller is replaced. The inspector reviewed this unresolved item with the resident inspector and the licensee. The discussion involved the applicability of the inservice inspection program for equipment changes. The inservice inspection and test program are required to be performed in accordance with ASME B&PV Code Section XI by surveillance specification 4.0.5 of the plant technical specifications. ASME B&PV Code Section XI requires that "when a reference value or set of values may have been affected by repair or routine servicing of the pump, a new reference value or set of values shall be determined or the previous value reconfirmed by an inservice test run prior to, or within 96 hours after return of the pump to normal service".

Therefore, the licensee's failure to establish the new baseline data for the subject pump was a violation of the technical specification surveillance requirements. This is violation No. 50-325/82-23-02, Failure to Re-establish Baseline Data for RHR SW Pump 1 D After Maintenance Activities.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Independent Inspection (Units 1 and 2)

The inspector reviewed the licensee's response to Generic Letter No. 81-34, "Safety Concerns Associated with Pipe Breaks in the BWR Scram System," dated August 31, 1981. The purpose of the review was to identify any commitments involving periodic inservice inspection of the scram system piping.

The licensee's response, dated June 14, 1982, takes exception to the risk analysis of NUREG-0803 and therefore, takes exception to the premise that periodic inservice inspection is necessary.

Because of the date of the licensee's response, the inspector elected not to pursue the subject any further until NRR has had a chance to review it.

There were no violations or deviations identified during this phase of the inspection.

6. IE Bulletin Follow-up (Units 1 and 2)

a. IE Bulletin 80-13-Cracking in Core Spray Spargers. The licensee met with NRC in Bethesda on June 14 and 15, 1982 to discuss the three-inch crack found in the Unit 2 core spray sparger. The inspector discussed the licensee's preparations for mapping of the crack and the rationale for not clamping the pipe with the licensee's NSSS engineers. There were no further questions at this time, this Bulletin will be reviewed again during the next refueling outage.

b. IE Bulletin 80-08 - Examination of Containment Liner Penetration Welds. The inspector has reviewed the licensee's supplemental response to IEB 80-08, Serial No. NO-81-1262 dated July 29, 1981. This response completed the licensee's required actions on this Bulletin. This item is closed.

7. Inservice Inspection Program (Units 1 and 2)

During review of the licensee's inservice inspection program the inspector noted that the licensee has exempted the main steam piping between the containment isolation valves and the turbine stop valves. During discussions with the licensee, the inspector learned that the person that made the decision to exclude these piping runs was no longer with the company and no one knew what the rationale for the exclusion was based on. Further discussions led to the conclusion that the welds have not been included in the inservice inspection of either plant since commercial operation.

In an attempt to re-construct the reason for excluding the piping, the inspector and members of the licensee's QA and engineering staff reviewed the FSAR, preservice inspection records and inservice inspection records for anything involving main steam piping. (At Brunswick the piping from the reactor vessel to the containment isolation valve is nuclear steam and between the containment isolation and the turbine stop valve it is called main steam.)

This search did find one reference in the FSAR which appeared to exclude the main steam from the inservice boundary, but it also found three areas which described inspection requirements for the main steam piping.

A review of the baseline inspection data showed that all of the welds in the main steam piping were subjected to baseline inspection in accordance with ASME B&PV Code Section XI.

Based on this review it appears that the decision to exclude the main steam piping from the program was ill-advised and put the licensee in violation of the ASME B&PV Code Section XI requirements for inservice inspection. This violation is No. 50-324, 325/82-23-01, Failure to Include Main Steam Piping in the ISI Program.

8. Inspector Follow-up Item

IFI (50-324/82-17-02) Pipe Leak. The inspector reviewed the licensee's actions regarding the leak in the reactor water cleanup piping. This item is closed.