

USNRC-REGION II
ATLANTA, GEORGIA

CP&L

Carolina Power & Light Company

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

September 13, 1982

FILE: B09-13510E
SERIAL: BSEP/82-1952

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 AND 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 50-324/82-26 and 50-325/82-26 and finds that it does not contain any information of a proprietary nature.

The report identified one item that appears to be in noncompliance with NRC requirements. This item and Carolina Power and Light Company's response is addressed in the following text:

Violation: (Severity Level IV)

10CFR50, Appendix B, Criterion XIV, and the Accepted Quality Assurance Program (letter to Eisenhut from Utley, Serial Number OQA-81-026, dated March 18, 1981) requires that measures provide for identification of items which have satisfactorily passed required inspections and tests, where necessary, to preclude inadvertent bypassing of such inspections and tests. The Accepted Quality Assurance Program endorses Regulatory Guide 1.33, 1972, and ANSI N18.7-1976. Section 5.2.6 of ANSI N18.7 requires, when equipment is ready to be returned to service, operating personnel shall place the equipment in operation and verify and document its functional acceptability. Corrective Maintenance Procedure MP-14 implements this requirement by having the Shift Foreman identify on the work request all testing that will be required to demonstrate operability following maintenance.

1. Contrary to the above, eight work requests associated with corrective maintenance which had been performed on containment isolation valves were reviewed, and testing to be performed following maintenance was not specified. On each work request, the space provided for required testing

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had been marked not applicable by a Shift Foreman. Four of the eight valves were returned to service without operability testing. All eight work requests were signed by a Shift Foreman signifying final acceptance of the work and satisfactory demonstration of valve acceptability.

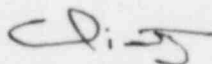
2. Contrary to the above, measures have not been established to assure that all required testing will be performed at a later date when conditions do not permit appropriate testing at the time maintenance work is completed. As indicated in Item 1 above, existing measures did not preclude bypassing requires tests.

Carolina Power and Light Company's Response

Carolina Power and Light Company acknowledges that its post maintenance testing program violates NRC requirements. Administrative oversight during the development of the postmaintenance testing program allowed the identified discrepancies to evolve.

To correct the postmaintenance testing problems identified in this report and to assure future compliance, a completely new comprehensive testing program is being developed. This program will be designed to ensure that both postcorrective maintenance and postpreventive maintenance requirements are satisfied. This program, to be elucidated in MP-10 and MP-14, and the required training for those personnel responsible for its implementation will be completed prior to the startup of either unit.

Very truly yours,



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

RMP/gvc

Enclosure

cc: Mr. R. C. DeYoung