



Carolina Power & Light Company

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

March 17, 1994

SERIAL:BSEP 94-0113  
10CFR2.201

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62  
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

On February 28, 1994, the Nuclear Regulatory Commission (NRC) issued a Notice of Violation for the Brunswick Steam Electric Plant, Units 1 and 2. The basis for the violation is provided in NRC Inspection Report 50-325/94-02 and 50-324/94-02. Carolina Power & Light Company finds the inspection does not contain information of a proprietary nature. Enclosure 1 provides Carolina Power & Light Company's response to the Notice of Violation in accordance with the provisions of 10CFR2.201.

Please refer any questions regarding this submittal to Mr. R. E. Lopriore at (910) 457-2404.

Very truly yours,

J. Cowan, Director-Site Operations (Acting)  
Brunswick Nuclear Plant

JFM/jfm

Enclosures

1. Reply to Notice of Violation
2. List of Commitments

cc: Mr. S. D. Ebnetter, Regional Administrator, Region II  
Mr. P. D. Milano, NRR Project Manager - Brunswick Units 1 and 2  
Mr. R. L. Prevatte, Brunswick NRC Senior Resident Inspector

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*Handwritten initials/signature*

ENCLOSURE

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 and 2  
NRC DOCKET NOS. 50-325 & 50-324  
OPERATING LICENSE NOS. DPR-71 & DPR-62  
REPLY TO NOTICE OF VIOLATION

VIOLATION A:

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented procedures appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Contrary to the above, on January 11, 1994, Maintenance Surveillance Test 1-MST-RHR27M, Residual Heat Removal Shutdown Cooling Reactor Pressure Instrument Channel Calibration, Revision 9, was inadequate in that it did not require the isolation logic to be reset after the second trip signal. This resulted in a loss of residual heat removal and spent fuel pool cooling.

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

RESPONSE TO VIOLATION:

Admission or Denial of Violation

Carolina Power & Light Company admits this violation.

Reason for Violation

This violation is due to inadequate technical reviews being performed for revisions 8 and 9 of the Maintenance Surveillance Test (MST). The MST is a channel calibration and functional test and is performed to determine the operability of the reactor pressure Residual Heat Removal (RHR) shutdown cooling isolation function (Group 8) of the Primary Containment Isolation System (PCIS). The MST inserts a trip signal to the PCIS Group 8 isolation logic. The trip signal is verified, reset, and tripped again. The isolation logic remains in the trip condition until it is reset, and then only if the initiating condition has cleared. The MST failed to provide direction to reset the remaining logic trip signal.

Prior to Revision 8, the MST was performed with jumpers installed around the isolation relays. With the jumpers installed, the isolation logic is bypassed, and a reset is not required to clear the circuitry. Revision 8 deleted the steps to install the jumpers. Revision 9 added the steps to de-energize the Group 8 isolation valves if shutdown cooling was in service. Neither revision added steps to reset the logic prior to re-energizing the valves.

Corrective Actions Which Have Been Taken and Results Achieved

1. The Group 8 isolation logic was reset and shutdown cooling was re-established within approximately 8 minutes.
2. 1/2MST-RHR27M was revised to include steps to reset the isolation logic at the completion of testing which causes a trip of the isolation logic relays.
3. This event was reviewed with the Maintenance Procedure Writers.

Corrective Steps Which Will Be Taken to Avoid Further Violations

1. A review of other MSTs that test isolation circuitry is in progress to verify procedural adequacy. This review is expected to be completed by May 31, 1994.

All corrective actions will be completed by May 31, 1994.

Date When Full Compliance Will Be Achieved

Carolina Power & Light believes that it is in full compliance with 10 CFR Part 50, Appendix B, Criterion V.

Proposed Corrective Actions

Commitment	Resp group	Plant due date	Priority	Agency due date	FACTS #
1. Revise 1/2MST-RHR27M to include steps to reset the isolation logic at the completion of testing which causes a trip of the isolation logic relays.	Maintenance	Complete	4B	NA	94B017C
2. Review the event with the Maintenance Procedure Writers.	Maintenance	Complete	4B	NA	94B017E
3. Review other MSTs that test isolation circuitry to verify procedural adequacy.	Maintenance	5/10/94	4B	5/31/94	94B017D