CP&L

Carolina Power & Light Company

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

September 3, 1982

FILE: B09-13510E
SERIAL: BSEP/82-1915

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 NO. 50-324 AND 50-325
LICENSE NOS. DPR-62 AND DPR-71
SUPPLEMENTAL RESPONSE TO AN INFRACTION OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 50-324/82-18 and 50-325/82-18 and finds that it does not contain any information of a proprietary nature. This supplemental response addresses concerns expressed by the resident inspectors and supersedes the response dated July 2, 1982.

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

Violation (Severity Level V)

Technical Specification 6.8.1a requires written procedures to be implemented for items 1.5.a and d.17 of Appendix A to Regulatory Guide 1.33.

Contrary to the above, procedures required by items 1.5.a and d.17 were not implemented in that the output breaker 1A-1 battery charger was momentarily not positioned in accordance with clearance procedure 1-459 on April 19, 1982, and service water vital header crosstie valve, 1-SW-V118, was not positioned per Operating Procedure 43 on May 6, 1982.

Carolina Power and Light Company's Response

Carolina Power and Light Company acknowledges that this was a violation of NRC requirements. The event involving 1A-1 battery charger occurred due to an auxiliary operator (AO) performing a job in which he was not assigned, nor briefed, whereas the cause for crosstie valve 1-SW-V118 being found in the closed position could not be definitely determined.

While removing an equipment clearance on Division II 125 VDC battery, 1A-1, an AO assigned to perform a second verification for the clearance removal removed the red tag from and opened the battery charger output breaker. Prior to removing the clearance, an AO was assigned to remove this clearance from battery 1A-1 and had been briefed by the Control Operator on the proper sequence for removing the clearance and restoring the battery to service. A second AO, assigned to perform a second lineup verification following the removal of the clearance, decided to assist the first AO in the clearance removal. He removed the red tag from the battery charger breaker (the charger was supplying the bus at this time) and assuming that the breaker needed to be repositioned, opened the breaker. The first AO immediately realized the problem and the breaker was reclosed restoring power to the bus.

The two operators responsible for this violation were counseled by their Shift Foreman and Shift Operating Supervisor. A review of the incident was also conducted with the plant General Manager, Manager - Plant Operations, and the responsible individuals. Each operating shift also conducted a shift review on this incident.

The exact cause for the service water vital header crosstie valve 1-SW-V118 being found in the closed position could not be determined. A review of plant operating records indicate that torus cooling was initiated at 0743 on May 5, 1982, using the A loop of RHR and was secured at 0140 on May 6, 1982. The plant operating procedure used to align the Service Water System for torus cooling does not require the operation of the V118 valve; however, it is believed that this valve was shut during this evolution to isolate the A service water vital header from the B header. When the system was returned to its required lineup following the completion of the torus cooling operation, the V118 valve was not returned to the open position, as the procedure did not address the operating of this valve for this evolution.

A review of the operating procedure for aligning service water for either torus cooling or shutdown cooling does not reposition the normally open vital header crosstie valve, SW-V118; however, it is felt that this valve should be operated during these evolutions. The procedure is being reviewed to determine its adequacy and will be revised by September 30, 1982, to correct any operational or technical deficiencies.

A review was also performed to determine if this out-of-position valve should have been identified during a review of the control panel performed during shift turnover. It was determined that this valve, as well as others, being out of position may not be so identified due to the number of valves and their physical orientation on the control panel. To assist the operator in identifying out-of-position valves when reviewing the control panel, all safety-related valves have their normal position indicated on the panel next to each respective valve.

It is felt that the valve "normal" position indicating addition and the revisions to the operating procedure will correct this problem. All operating procedures are currently being reviewed and rewritten to assure technical and operational adequacy. This program is scheduled to take approximately two years to complete.

Very truly yours,

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

RMP/tct

Enclosure

cc: Mr. R. C. DeYoung