



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos. 50-325/82-3⁶ and 50-324/82-32

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

Facility Name: Brunswick 1 and 2

Docket Nos. 50-325 and 50-324

License Nos. DPR-71 and DPR-62

Inspection at Brunswick site near Southport, North Carolina

Inspectors: P. E. Fredrickson 7/8/82
P. E. Fredrickson Date Signed

L. H. Jackson 9/9/82
L. H. Jackson Date Signed

Approved by: C. M. Upright 9/10/82
C. M. Upright, Section Chief Date Signed
Engineering Inspection Branch
Division of Engineering and Technical Programs

SUMMARY

Inspection on August 24-27, 1982

Areas Inspected

This special unannounced inspection involved 40 inspector-hours on site in the area of licensee pre-startup activities being conducted in response to the Confirmation of Action (COA) letters dated July 2 and 20, 1982. Specific areas reviewed were pre-startup quality assurance reviews, corporate nuclear safety reviews, post-maintenance testing, and plant modifications involving changes to Technical Specifications. Licensee action was mainly reviewed with respect to the Brunswick Master Prestartup Action Items List and the CP&L presentation to the Nuclear Regulatory Commission on August 24, 1982.

Results

Within the areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- A. Bishop, Manager, Technical Services
- L. Boyer, Administrative Supervisor
- *C. Dietz, General Manager
- *W. Dorman, QA Supervisor
- E. Enzor, Director, Regulatory Compliance
- *B. Furr, Vice President, Nuclear Operations
- J. Harness, Manager, Plant Operations
- *P. Howe, Vice President-Technical Services
- J. Jeffries, Manager, Corporate Nuclear Safety Section
- G. Milligan, Principal Engineer, Onsite Nuclear Safety
- *R. Poulk, Regulatory Compliance Specialist

NRC Resident Inspectors

- *D. Myers, Senior Resident Inspector
- *L. Garner, Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on August 27, 1982, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. QA Reviews

- References:
- (a) OQA/QC Surveillance of Technical Specifications, dated 8/5/82
 - (b) OQA/QC Review of IE Bulletin and OQA Surveillance Reports, dated 8/11/82

The inspector reviewed references (a) and (b) to verify that the operational quality assurance group had performed reviews as discussed with the NRC in the Region II office on August 24, 1982. Reference (a) was conducted to

comply with Item 2 of the July 20, 1982, COA letter. All Technical Specification surveillances had been reviewed with respect to identified periodic tests (PTs) to determine whether the PT would satisfy surveillance requirements. Any discrepancies were identified and placed into a tracking system. This review identified several pre-startup items which have been identified as nonconformances and are on the Master Prestartup Action Item List. Reference (b) reviewed all IE Bulletins and OQA surveillance reports issued from 1979 to the present. Licensee responses to bulletin were reviewed for completion. Surveillance reports were reviewed to determine completion of corrective action. Those nonconforming items that were not completed were also added to the Master List. The inspector determined that both reviews were thorough, giving Brunswick a new bench mark from which to continue OQA surveillances and perform Technical Specification surveillances. Within this area, no violations or deviations were identified by the inspector.

6. CNS Reviews

The inspector reviewed the operating procedure (OP) and PT review conducted by the Corporate Nuclear Safety Section (CNSS). The Local Leak Rate Testing (LLRT) and the COA evaluations conducted by this organization were also reviewed. Management of this effort was provided primarily from the onsite portion of the CNSS, identified as Onsite Nuclear Safety (ONS). The inspector interviewed the ONS principal engineer and members of his staff and reviewed the process for conducting the procedure review. For both the OP and PT review, a master list had been developed to track each procedure through the review cycle. Several review sheets were examined to evaluate the depth and thoroughness of the review. As reviews were conducted, the urgency of procedure changes were evaluated to determine whether individual change implementations should be pre-startup or post-startup requirements. A review of this decision making process revealed no readily apparent judgement errors. At the time of this inspection, a significant number of PTs (150 of 400) remained in the review process. It should be noted that most of these PTs have been reviewed by ONS. Based on the number of those previously reviewed that required pre-startup changes, the remaining PTs will increase the size of the Master Prestartup Action Item List, but should not alter startup estimates significantly. The ONS investigation of both the COA and the LLRT problem appears to be thorough and objective, pointing out weaknesses in the site's evaluation and actions and recommending improvements. ONS follows up on its evaluations, where weaknesses are identified. With a portion of the independent review committee located onsite, real-time evaluations are apparently being conducted. Within this area, no violations or deviations were identified by the inspector.

7. Post-Maintenance Testing

A rough draft of maintenance procedure MP16, Writing Corrective Maintenance Instructions, was reviewed to ensure that post-maintenance testing requirements for equipment are included and will be performed and documented. The revised procedure now requires the Shift Operating Supervisor (SOS) to assign a control number and attach a copy of the post-maintenance testing requirements form to the trouble ticket. The trouble ticket is then routed

to the planner where the post-maintenance testing requirements are specified. If maintenance cannot be performed as described on the trouble ticket, the ticket must be revised by the planner to incorporate the appropriate work. The final verification to ensure all post-maintenance testing has been conducted is documented by the SOS. CP&L should be in a position to assure post-maintenance testing is performed as required if this revised procedure is properly implemented. Within this area, no violations or deviations were identified by the inspector.

8. Plant Modifications Involving Technical Specifications

Reference: ENP-3, Plant Modifications, Revision 16

The inspectors reviewed the reference with respect to the processing of plant modifications that require a Technical Specification change. A problem in the area had been identified when several hydraulic snubbers, which are required to be operable when the plant is at power, were removed by a plant modification and a Technical Specification change was not issued by the NRC. In this case, the licensee has evaluated the problem and plans to make a change to the reference to specifically address hydraulic snubbers. The problem with the snubbers originates from an unwritten agreement between the licensee and NRR whereby when snubbers are evaluated and removed during an outage, the Technical Specification change is submitted and approved after the modification is completed, but before the unit starts up. The normal handling of technical specification changes, as addressed in 10 CFR 50.59, requires prior NRC approval of those modifications which affect Technical Specifications. ENP-3, which is written to comply with 10 CR 50.59, describes this permission-prior-to-implementation method of processing Technical Specifications effecting modifications. A further review of plant modifications revealed that a similar type problem had occurred in relation to a plant modification, changing some plant instrumentation from digital to analog loops. In this case, prior NRR approval for the entire changeout was given, but the licensee informed NRR after completing each partial changeout and then a Technical Specification change was issued. Here, the licensee operated the instrumentation under improper surveillance requirements pending the receipt of the approved change. Although different in content, both the snubber and instrument problem appear to stem from not having this reverse Technical Specification change method described adequately in ENP-3. The licensee plans to make a pre-startup change to ENP-3 for the snubbers and committed to review ENP-3 for the potential generic problem as a post-startup requirement. The licensee also stated that, due to this generic possibility, a pre-startup review of all Technical Specification modifications initiated subsequent to the last outage would be conducted for proper handling of Technical Specification change submittals. Within this area, no violations or deviations were identified by the inspector.