



Carolina Power & Light Company

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

January 4, 1991

FILE: B09-13510C
SERIAL: BSEP/91-0012

U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Document Control Desk

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
MONTHLY OPERATING REPORT

Gentlemen:

In accordance with Technical Specification 6.9.1.11 for the Brunswick Steam Electric Plant, Units 1 and 2, Carolina Power & Light Company herewith submits the report of operating statistics and shutdown experience for the month of December 1990.

Very truly yours,

J. I. Harness, General Manager
Brunswick Nuclear Project

RDR/ah
90-0041.MSC

Enclosures

cc: Ms. D. M. Aslett
Mr. T. C. Bell
Mr. R. M. Coats
Mr. S. D. Ebnetter
Mr. M. D. Hill
Mr. N. B. Le
Mr. W. R. Murray
Mr. R. G. Oehl
Mr. R. L. Prevatte
Mr. R. B. Starkey
INPO

9101110334 901231
PDR ADOCK 05000324
R PDR

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PLANT PERFORMANCE DATA SYSTEM
APPENDIX B - AVERAGE DAILY POWER LEVEL
BRUNSWICK UNIT 1

PAGE 1
RFD39-000

DOCKET NO. 050-0325
COMPLETED BY RONALD RUMPLE
TELEPHONE (919)457-2752

DECEMBER 1990

DAY	AVG. DAILY POWER LEVEL (MWE-NET)	DAY	AVG. DAILY POWER LEVEL (MWE-NET)
1	-4	17	-4
2	-4	18	-3
3	-4	19	-2
4	-4	20	-3
5	-5	21	-3
6	-4	22	-2
7	-4	23	-3
8	-4	24	-3
9	-4	25	-3
10	-4	26	-3
11	-4	27	-3
12	-4	28	-2
13	-4	29	-2
14	-4	30	-2
15	-4	31	-2
16	-3		

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 RUN DATE 01/03/91
 RUN TIME 13.30.23

PLANT PERFORMANCE DATA SYSTEM
 OPERATING DATA REPORT
 BRUNSWICK UNIT 1

PAGE 1
 RPD36-000

DOCKET NO. 050-0325
 COMPLETED BY RONALD RUMPLE
 TELEPHONE (919)457-2752

OPERATING STATUS

- | | |
|---|---|
| <ol style="list-style-type: none"> 1. UNIT NAME: BRUNSWICK UNIT 1 2. REPORTING PERIOD: DECEMBER 90 3. LICENSED THERMAL POWER (MWT): 2436 4. NAMEPLATE RATING (GROSS MWE): 867.0 5. DESIGN ELECTRICAL RATING (NET MWE): 821.0 6. MAX DEPENDABLE CAPACITY (GROSS MWE): 815.0 7. MAX DEPENDABLE CAPACITY (NET MWE): 790.0 8. IF CHANGES OCCUR IN CAPACITY RATINGS (ITEMS 3 THRU 7) SINCE LAST REPORT, GIVE REASONS. 9. POWER LEVEL TO WHICH RESTRICTED IF ANY (NET MWE): 10. REASONS FOR RESTRICTION IF ANY: | <p>NOTES</p> <p>Refueling is now in progress. There are 160 PWR spent fuel bundles in the Fuel Pool. There are no fuel bundles in the new Fuel Storage Vault.</p> |
|---|---|

	THIS MONTH	YR TO DATE	CUMUL ATIVE
11. HOURS IN REPORTING PERIOD	744.00	8760.00	120888.00
12. NUMBER OF HOURS REACTOR CRITICAL	.00	5948.25	79302.16
13. REACTOR RESERVE SHUTDOWN HRS	.00	.00	1647.10
14. HOURS GENERATOR ON LINE	.00	5910.20	75863.24
15. UNIT RESERVE SHUTDOWN HOURS	.00	.00	.00
16. GROSS THERMAL ENERGY GEN. (MWH)	.00	13728130.62	163197643.18
17. GROSS ELEC. ENERGY GEN. (MWH)	.00	4471445.00	53533475.00
18. NET ELEC. ENERGY GENERATED (MWH)	-2581.00	4321246.00	51502394.00
19. UNIT SERVICE FACTOR	.00	67.47	62.75
20. UNIT AVAILABILITY FACTOR	.00	67.47	62.75
21. UNIT CAP. FACTOR (USING MDC NET)	-.44	62.44	53.93
22. UNIT CAP. FACTOR (USING DER NET)	-.42	60.08	51.09
23. UNIT FORCED OUTAGE RATE	.00	8.47	15.04
24. SHUTDOWNS SCHED. OVER NEXT 6 MONTHS (TYPE, DATE, AND DURATION OF EACH):			

25. IF SHUTDOWN AT END OF REPORT PERIOD, ESTIMATED DATE OF START UP: 02/20/91
 26. UNITS IN TEST STATUS (PRIOR TO COMMERCIAL OPERATION): FORECAST ACHIEVED

INITIAL CRITICALITY		
INITIAL ELECTRICITY		
COMMERCIAL OPERATION		

DOCKET NO. 050-0325
 UNIT NAME Brunswick 1
 DATE Jan. 1991
 COMPLETED BY Ronald Rumble
 TELEPHONE 919-657-2752

UNIT SHUTDOWNS AND POWER REDUCTIONS
 REPORT MONTH December 1990

NO	DATE	TYPE 1	DURATION (HOURS)	REASON 2	METHOD OF SHUTTING DOWN REACTOR	LICENSEE EVENT REPORT NO.	SYSTEM CODE 4	COMPONENT CODE 5	CAUSE & CORRECTIVE ACTION TO PREVENT RECURRENCE
90-069	900927	S	744.0 (in progress)	C	4		RC	Fuel XX	Refuel/Maintenance Outage

1: F - Forced
 S - Scheduled

2: REASON
 A - Equipment failure (explain)
 B - Maintenance or test
 C - Refueling
 D - Regulatory restriction
 E - Operator Training & license Examination
 F - Administrative
 G - Operational error (explain)
 H - Other (explain)

3: METHOD
 1 - Manual
 2 - Manual scram
 3 - Automatic scram
 4 - Continuations
 5 - Load reductions
 6 - Other

4: EXHIBIT G -
 Instructions for preparation of data entry sheets for Licensee Event Report (LER) file (NUREG-0161)

5: EXHIBIT I -
 Same source

CP&L CO
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PLANT PERFORMANCE DATA SYSTEM
APPENDIX B - AVERAGE DAILY POWER LEVEL
BRUNSWICK UNIT 2

PAGE 2
RPD39-000

DOCKET NO. 050-0324
COMPLETED BY RONALD RUMPLE
TELEPHONE (919)457-2752

DECEMBER 1990

DAY	AVG. DAILY POWER LEVEL (MWE-NET)	DAY	AVG. DAILY POWER LEVEL (MWE-NET)
1	774	17	773
2	738	18	774
3	773	19	774
4	773	20	774
5	774	21	774
6	774	22	774
7	774	23	762
8	734	24	773
9	584	25	773
10	774	26	774
11	776	27	775
12	776	28	774
13	776	29	774
14	776	30	754
15	776	31	772
16	764		

CP&L CO
 RUN DATE 01/03/91
 RUN TIME 13:30:23

PLANT PERFORMANCE DATA SYSTEM
 OPERATING DATA REPORT
 BRUNSWICK UNIT 2

PAGE 2
 RFD36-000

DOCKET NO. 050-0324
 COMPLETED BY RONALD RUMPLE
 TELEPHONE (919)457-2752

OPERATING STATUS

- | | |
|--|---|
| <ol style="list-style-type: none"> 1. UNIT NAME: BRUNSWICK UNIT 2 2. REPORTING PERIOD: DECEMBER 90 3. LICENSED THERMAL POWER (MWT): 2436 4. NAMEPLATE RATING (GROSS MWE): 867.0 5. DESIGN ELECTRICAL RATING (NET MWE): 821.0 6. MAX DEPENDABLE CAPACITY (GROSS MWE): 815.0 7. MAX DEPENDABLE CAPACITY (NET MWE): 790.0 8. IF CHANGES OCCUR IN CAPACITY RATINGS (ITEMS 3 THRU 7) SINCE LAST REPORT, GIVE REASONS: | <p>NOTES - There are 560 fuel bundles in the Reactor Core. There are 1072 BWR and 144 PWR spent fuel bundles in the Fuel Pool. There are no fuel bundles in the new Fuel Storage Vault.</p> |
|--|---|

9. POWER LEVEL TO WHICH RESTRICTED IF ANY (NET MWE):
10. REASONS FOR RESTRICTION IF ANY:

	THIS MONTH	YR TO DATE	CUMUL ATIVE
11. HOURS IN REPORTING PERIOD	744.00	8760.00	132912.00
12. NUMBER OF HOURS REACTOR CRITICAL	744.00	5926.70	84476.81
13. REACTOR RESERVE SHUTDOWN HRS	.00	.00	.00
14. HOURS GENERATOR ON LINE	744.00	5618.92	79992.26
15. UNIT RESERVE SHUTDOWN HOURS	.00	.00	.00
16. GROSS THERMAL ENERGY GEN. (MWH)	1789238.10	13035355.60	168122749.96
17. GROSS ELEC. ENERGY GEN. (MWH)	584715.00	4214983.00	54387139.00
18. NET ELEC. ENERGY GENERATED (MWH)	568580.00	4049901.00	52149306.00
19. UNIT SERVICE FACTOR	100.00	64.14	60.18
20. UNIT AVAILABILITY FACTOR	100.00	64.14	60.18
21. UNIT CAP. FACTOR (USING MDC NET)	96.74	58.52	49.67
22. UNIT CAP. FACTOR (USING DER NET)	93.08	56.31	47.79
23. UNIT FORCED OUTAGE RATE	.00	18.03	13.03
24. SHUTDOWNS SCHED. DYER NEXT 6 MONTHS (TYPE, DATE, AND DURATION OF EACH):			

25. IF SHUTDOWN AT END OF REPORT PERIOD, ESTIMATED DATE OF START UP:
26. UNITS IN TEST STATUS (PRIOR TO COMMERCIAL OPERATION): FORECAST ACHIEVED

INITIAL CRITICALITY	-----	-----
INITIAL ELECTRICITY	-----	-----
COMMERCIAL OPERATION	-----	-----

DOCKET NO. 050-0324
 UNIT NAME Brunswick 2
 DATE Jan. 1991
 COMPLETED BY Ronald Rumpie
 TELEPHONE 919-657-2752

UNIT SHUTDOWNS AND POWER REDUCTIONS
 REPORT MONTH December 1990

NO.	DATE	TYPE 1	DURATION (HOURS)	REASON 2	METHOD OF SHUTTING DOWN REACTOR	LICENSEE EVENT REPORT NO.	SYSTEM CODE 4	COMPONENT CODE 5	CAUSE & CORRECTIVE ACTION TO PREVENT RECURRENCE
90-088	901208	S	0	B	5				Reduced power to perform scheduled maintenance and testing activities.

1: F - Forced
 S - Scheduled

2: REASON
 A - Equipment failure (explain)
 B - Maintenance or test
 C - Refueling
 D - Regulatory restriction
 E - Operator Training & License Examination
 F - Administrative
 G - Operational error (explain)
 H - Other (explain)

3: METHOD
 1 - Manual
 2 - Manual scram
 3 - Automatic scram
 4 - Contaminations
 5 - Load reductions
 6 - Other

4: EXHIBIT G -
 Instructions for preparation of data entry sheets for Licensee Event Report (LER) file (NUREG-0161)

5: EXHIBIT I -
 Same source



NIAGARA MOHAWK POWER CORPORATION / 301 PLAINFIELD ROAD, SYRACUSE, N.Y. 13212 / TELEPHONE (315) 474-1511

January 7, 1991
NMP1L 0558

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

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63
TAC No. 68570

Gentlemen:

By letter dated November 20, 1990, the Nuclear Regulatory Commission requested Niagara Mohawk to submit additional information regarding station blackout. The requested information was to be submitted by January 4, 1991, in order for the Staff to complete its evaluation of Nine Mile Point Unit 1. This letter is to inform you of a delay in our submittal.

Niagara Mohawk retained two outside consulting firms to assist in the preparation of our response to the Staff's request for additional information. This assistance included a reanalysis of reactor coolant system inventory, a transient analysis of Control Room heat-up, and an analysis of containment heat-up. The results of these analyses were received during the week of December 31, 1990. However, the actual hard copy documentation has not yet been received for the Control Room and containment heat-up analyses.

To provide assurance that these analyses are accurate and reflect present plant configuration, an internal independent review and verification will be performed by Niagara Mohawk. Niagara Mohawk believes that the completion of its internal review is necessary based on the complexity of these analyses and their importance in demonstrating the ability of Nine Mile Point Unit 1 to withstand and recover from a station blackout. Therefore, we have chosen to delay our response until this review is complete. As discussed with our Project Manager, Mr. D. S. Brinkman, we plan to delay submitting our response until January 25, 1991.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

C. D. Terry
Vice President
Nuclear Engineering

AR/kms

xc: Regional Administrator, Region I
Mr. W. A. Cook, Senior Resident Inspector
Mr. R. A. Capra, Project Directorate No. I-1, NRR
Mr. D. S. Brinkman, Project Manager, NRR
Records Management

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Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914-736-8000



January 03, 1991
IPO-91-001L
IP3-91-002

Docket No. 50-286
License No. DPR-64

Mr. Thomas T. Martin
Region I Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Martin:

In accordance with 10CFR50.54(q), one (1) copy of the most recent revisions to our Emergency Plan has been sent to the NRC Document Control Desk in Washington, D.C. and one (1) copy has been sent to your office, Emergency Preparedness Section. These changes have been determined not to decrease the effectiveness of the Indian Point 3 Emergency Plan and the Plan, as changed, continues to meet the standards of 10CFR50.45(b) and Appendix E.

In addition, as requested by your staff, a second copy has been forwarded to your Emergency Preparedness Section and one (1) copy has been provided to the IP-3 Resident NRC Inspector.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe Russell".

Joseph E. Russell
Resident Manager
Indian Point No. 3 Nuclear Power Plant

JER/DB/bh

cc: Document Control Desk (original)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Resident Inspector's Office
Indian Point No. 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, New York 10511

IE3
110



PEACH BOTTOM—THE POWER OF EXCELLENCE

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

R. D. 1, Box 208

Delta, Pennsylvania 17314

(717) 456-7014

D. B. Miller, Jr.
Vice President

January 7, 1991

10 CFR 2.201

Docket Nos. 50-277
50-278

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

SUBJECT: Peach Bottom Atomic Power Station - Units 2 & 3
Response to Notice of Violation
(Combined Inspection Report Nos. 50-277/90-18; 50-278/90-18)

Dear Sir:

In response to your letter dated November 29, 1990 which transmitted the subject Inspection Report and Notice of Violation, we submit the attached response. The subject Inspection Report concerns a routine resident safety inspection during the period September 24 through October 29, 1990.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

- cc: R. A. Burricelli, Public Service Electric & Gas
- T. M. Gerusky, Commonwealth of Pennsylvania
- J. J. Lyash, USNRC Senior Resident Inspector
- T. T. Martin, Administrator, Region I, USNRC
- H. C. Schwemm, Atlantic Electric
- R. I. McLean, State of Maryland
- J. Urban, Delmarva Power

9101110320 910107
PDR ADOCK 05000277
Q PDR

bcc: J. A. Basilio	52A-5, Chesterbrook
G. J. Beck	52A-5, Chesterbrook
J. A. Bernstein	51A-13, Chesterbrook
R. N. Charles	51A-1, Chesterbrook
Commitment Coordinator	52A-5, Chesterbrook
Correspondence Control Program	61B-3, Chesterbrook
E. J. Cullen	S23-1, Main Office
A. D. Dycus	A3-1S, Peach Bottom
E. P. Fogarty	A4-4N, Peach Bottom
J. F. Franz	A4-1S, Peach Bottom
A. A. Fulvio	A4-1S, Peach Bottom
D. R. Helwig	51A-11, Chesterbrook
R. J. Lees, NRB	53A-1, Chesterbrook
J. M. Madara	53A-1, Chesterbrook
C. J. McDermott	S13-1, Main Office
D. B. Miller, Jr.	SMO-1, Peach Bottom
PB Nuclear Records	A4-2S, Peach Bottom
J. M. Pratt	B-2-S, Peach Bottom
L. B. Pyrih	63B-5, Chesterbrook
J. T. Robb	51A-13, Chesterbrook
D. M. Smith	52C-7, Chesterbrook

Restatement of Violation

10 CFR 50.55a(g) requires implementation of an Inservice Testing (IST) program for pumps and valves whose function is required for safety in accordance with the applicable edition of the ASME Boiler and Pressure Vessel Code, Section XI. The applicable edition of the Code for the purpose of the IST program is the 1980 Edition through Winter of 1981 addenda. Three examples of failure to adequately implement the provisions of the Code in administrative and technical procedures were identified:

1. Section XI, Article IWV 34.1, requires that Category A and B valves that cannot be exercised every 3 months during plant operation shall be exercised during cold shutdowns. The "Peach Bottom Atomic Power Station Units 2 and 3 Pump and Valve Inservice Testing Program," Section 5.2.2, states that valve testing will commence within 48 hours after reaching cold shutdown and will continue until all tests are complete or the plant is ready to return to power. Any testing not completed at one cold shutdown will be performed during subsequent cold shutdowns.

Contrary to the above, as of October 29, 1990, the licensee's IST program scheduling and implementing procedures did not contain provisions to ensure that cold shutdown testing is initiated consistently and in a timely manner, nor to ensure that all components are tested during periods of cold shutdown. As a result, not all required testing was conducted during periods of cold shutdown during this operating cycle.

2. Section XI, Article IWV 3510, requires that safety and relief valves be periodically tested. The licensee's IST program requests exemption from IWV 3510, and use of ANSI/ASME OM-1-1981 as an alternative test requirement. Both IWV 3510 and OM-1 require that when a valve fails to function properly during a regular test, an additional sample of valves will be tested.

Contrary to the above, as of October 29, 1990, the licensee had not established IST program implementing procedures or responsibilities to ensure that the expanded test sample required following a test failure would be performed.

3. Section XI, Article IWV 3410, states that Category A and B valves shall be exercised at least once every three months. The necessary valve disk movement shall be determined by observing an appropriate indicator or observing indirect evidence, such as changes in system pressure or flow rate, which reflect disk position. The "Peach

Bottom Atomic Power Station Units 2 and 3 Pump and Valve Inservice Testing Program," states that the core spray and residual heat removal minimum flow line check valves will be exercise tested quarterly in the forward direction.

Contrary to the above, as of October 29, 1990, the licensee had not established technically adequate procedures for performance of the forward direction testing of the core spray and residual heat removal minimum flow line check valves in that the procedures did not require observation of either direction or indirect evidence of valve disk movement.

This is a Severity Level IV Violation (Supplement 1).

Cause of the Violation (Example 1)

Programmatic controls of the Peach Bottom Inservice Testing (IST) Program for testing valves at cold shutdown were not properly implemented. Surveillance Test (STs) were written to implement this testing; however, effective means to ensure that these tests were performed during cold shutdown were not put into place. Additionally, controls were not properly implemented to ensure that testing initiated during shutdown that was not completed prior to returning to power would be completed during a subsequent shutdown. Since the IST program STs are event dependent, the program to issue and track routine STs does not effectively schedule these tests. A listing of the cold shutdown surveillance tests was forwarded to the ST Coordinator by the IST Coordinator, but the listing was used as a reference and for information only. Poor communication resulted in the lack of an action plan from either party to effectively track the progress of the unscheduled STs. There also was a lack of coordination to ensure that other administration or programmatic controls were in place to verify that the components were tested at the correct frequency and tracked. The potential for event dependent tests not being performed when required was identified by an in-house investigation, but corrective actions were not yet complete.

Corrective Action Taken

During the Unit 3 mid-cycle outage, three of the appropriate cold shutdown tests were performed prior to plant restart. All cold shutdown surveillance tests have been included in the scope of the Unit 2 Refueling Outage, beginning January, 1991.

Cause of Violation (Example 2)

During the implementation of the IST program, relief valve testing was placed in the Preventative Maintenance (PM) program. This was done to ensure that the valves would be tested at the correct frequency, alleviating the need for additional surveillance test procedures. The requirement to ensure that expanded testing is performed following a test failure was addressed by

Administrative Procedure A-127, "In-Service Testing"; however, adequate implementing procedures were not written to address the additional testing. The failure to initiate the appropriate controls to provide additional testing following a test failure and the lack of communication between Maintenance and the IST group to ensure the testing was performed were the cause of non-compliance.

Corrective Actions Taken

A review was conducted to verify that relief valves in the IST Program were included in the Preventative Maintenance Program. Additionally, a review of relief valves tested since the inception of the IST program was conducted to determine the number of failures that have occurred where additional testing was not performed. This review identified only one occurrence where this requirement was not met. An effort is currently underway between the IST group and Maintenance Engineering to develop procedural controls that adequately address the requirements.

Cause of Violation (Example 3)

During the initial writing and subsequent review of the surveillance tests used to exercise the Core Spray (CS) and Residual Heat Removal (RHR) minimum flow check valves, steps to verify the opening of these valves were overlooked. Although quarterly testing is performed on each pump which verifies that the motor operated minimum flow valves open, verification of check valve stroke determined by either direct or indirect observation was not performed.

Corrective Actions Taken

A review of the appropriate STs rewritten by the ST Rewrite Project identified the inadequacy of the procedure for system testing. A Corrective Action Request (CAR) was initiated by the IST Coordinator to incorporate the appropriate testing into the relevant STs and to track these revisions to completion. In addition, the Nuclear Quality Assurance Division performed an audit to determine if additional component testing is adequate, or if any other programmatic weaknesses can be identified. As a result of this audit, there is a high level of confidence that other valves are appropriately tested.

Corrective Steps That Will Be Taken to Avoid Future Violations

The Performance and Surveillance Group has developed an IST Program Review Plan which is scheduled for completion April 30, 1991. This review consists of six phases which are designed to assure program compliance with ASME Section XI for pump and valve testing, and to ensure consistency between PECO administrative procedures. Additionally, the specific implementation procedures or methods used to comply with the regulations are being reviewed for adequacy. During this review process methods to ensure proper cold shutdown testing is performed will be evaluated and the most appropriate methods will be implemented. The method to perform expanded relief valve

testing following any setpoint test failure will be enhanced, as well as the process for the quarterly verification of minimum flow check valve disk movement for the CS and RHR systems.

The appropriate scheduling, issuance, and tracking of IST ST's will also be enhanced through the completion of corrective actions associated with the recent review and analysis of an in-house investigation report on surveillance testing. The technical adequacy of the IST ST's and their adherence to IST Program requirements will be confirmed through the ST Rewrite Project.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by April 30, 1991 after the IST program revisions can be fully evaluated and implemented. Testing and inspection requirements of 10 CFR 50.55a(g) are currently in compliance. Interim compliance with the IST program until April 30, 1991 has been assured.