



Carolina Power & Light Company

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

JUN 02 1994

SERIAL: BSEP-94-0202  
10CFR50.73

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

BRUNSWICK NUCLEAR PLANT UNIT 2  
DOCKET NO. 50-324/LICENSE NO. DRP-62  
LICENSEE EVENT REPORT 2-94-007

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Part 50.73, Carolina Power & Light Company submits the enclosed Licensee Event Report. This report is being submitted within thirty days of discovery of the event and is submitted in accordance with the format set forth in NUREG-1022, September 1983.

Please refer any questions regarding this submittal to Mr. M. A. Turkal at (910) 457-3066.

Very truly yours,

J. Cowan, Director-Site Operations  
Brunswick Nuclear Plant

SFT/

Enclosures

1. Licensee Event Report
2. Summary 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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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNRB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20565-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  
Brunswick Steam Electric Plant, Unit 2

DOCKET NUMBER (2)  
05000324

PAGE (3)  
1 of 3

TITLE (4)  
Evaluation of Snubber Operability Not Performed Within Technical Specification Required Time Limit

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
03	18	94	94	- 07 -	00	06	02	94	FACILITY NAME	DOCKET NUMBER
										05000
										05000

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 1. (Check one or more of the following)(11)								
POWER LEVEL (10)	100%	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)		
		20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)		
		20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vi)		OTHER		
		20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract and Text)		
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)				
		20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(ix)				

LICENSEE CONTACT FOR THIS LER (12)

NAME  
Steve F. Tabor, Regulatory Affairs Specialist

TELEPHONE NUMBER  
(910) 457-2178

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES  
(If yes, complete EXPECTED SUBMISSION DATE)

X NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single space typewritten lines) (16)

On March 18, 1994, while Unit 2 was operating at rated power, craft personnel involved with the removal of a grout pad located under the baseplate of an Residual Heat Removal system snubber support identified that the snubber support anchor bolts were degraded and required repair. The involved personnel failed to take the necessary actions for ensuring an operability review of the degraded condition was performed in a timely manner. Consequently, the repair and evaluation of the inoperable snubber did not occur within the time constraints established by the Technical Specification. The failure to take prompt and effective actions is attributed to a lack of understanding of the significance of the degraded condition and planner training inadequacies. Training of craft and work planning personnel are being performed to prevent recurrence. An evaluation of RHR system operability determined that, although the degraded anchor bolts rendered the snubber inoperable, the affected RHR line remained operable. Consequently, this event has minimal safety significance. No similar events as reported in previous LERs were identified.

The cause classification for this event per the criteria of NUREG-1022 is A, personnel error.

Enclosure  
List of Regulatory Commitments

The following table identifies those actions committed to by Carolina Power & Light Company in this document. Any other actions discussed in the submittal represent intended or planned actions by Carolina Power & Light Company. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Brunswick Nuclear Plant of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage
The appropriate PMU planners will complete formal planner analyst training by end of the fourth quarter of 1994.	12/31/94

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20585-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Brunswick Steam Electric Plant Unit 2	05000324	94	- 07 -	00	3 of 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

CAUSE OF EVENT

On March 18, 1994, personnel failed to recognize the degraded snubber anchor bolts as a potential operability concern and consequently did not inform the appropriate personnel of the deficiency until March 23, 1994. The failure to take prompt and effective action is attributed to a lack of understanding of the significance of the degraded anchor bolts.

An investigation into this event has determined that the actions taken by the planner to route the WR/JO to the SRO were inadequate. The failure to properly route the WR/JO is attributed to inadequate planner training.

CORRECTIVE ACTIONS

Construction craft personnel have been briefed on the importance of fully identifying and reporting changes in work scope to supervision in a timely manner.

Corrective maintenance WR/JO planning is performed by Maintenance and selected Project Management Unit (PMU) planners. The planner involved in this event reports to the PMU. The involved planner was tasked to perform a corrective maintenance WR/JO which, because of changes in work scope encountered during the snubber support repair activity, required the planner to perform non-routine WR/JO processing functions. In contrast, Maintenance planners routinely process WR/JOs involving work scope changes and as such, they understand and effectively utilize the process for ensuring operability reviews of changes in work scope. Consequently, the failure to ensure an operability review is isolated to this unique case and the corrective actions required to prevent the recurrence of similar planner problems is directed toward the appropriate planners within the PMU as delineated below:

PMU planners have been briefed on the lessons learned from this event including the process for ensuring that work scope changes receive an operability impact review.

The appropriate PMU planners will complete formal planner analyst training by the end of the fourth quarter of 1994.

SAFETY ASSESSMENT

An engineering evaluation was performed which determined that although the degraded snubber anchor bolts rendered the snubber inoperable, the attached RHR line was operable. Based on the results of this evaluation, this event has minimal safety significance.

PREVIOUS SIMILAR EVENTS

No similar events as reported in previous LERs were identified.

EIIS COMPONENT IDENTIFICATION

<u>System/Component</u>	<u>EIIS Code</u>
Residual Heat Removal/Snubber	BO/SNB

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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Brunswick Steam Electric Plant Unit 2	05000324	94	- 07 -	00	2 of 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

TITLE

Evaluation of Snubber Operability Not Performed Within Technical Specification Required Time Limit

INITIAL CONDITIONS

On March 18, 1994, Unit 2 was operating at rated power. Both loops of the Residual Heat Removal (RHR) system were operable.

EVENT NARRATIVE

On February 6, 1993, a Work Request/Job Order (WR/JO) 93-AFCU1 was initiated to support the repair of the grout pad located under the baseplate of RHR system snubber 2-E11-69SS574. An evaluation of identified cracks in the grout had been performed which determined that the condition did not represent an operability concern. However, repair of the cracks was determined to be necessary to prevent water seepage beneath the baseplate and possible damage of the plate and related anchor bolts.

On March 18, 1994, the grout was removed in accordance with the WR/JO instructions. During grout removal, craft personnel determined that the snubber support anchor bolts were damaged and required replacement.

On March 23, 1994, craft personnel informed the work planner of the degraded snubber anchor bolts. The planner then initiated a WR/JO (93-AFCU2) to support repair of the snubber support. During planning of the WR/JO, the planner performed what was believed to be the necessary steps for ensuring an operability determination was performed. However, the routing established did not result in an SRO review of the WR/JO.

On April 13, 1994, a Quality Control inspector performing inspections of equipment located in the area of the 2-E11-69SS574 snubber observed the degraded anchor bolts and requested a review by engineering personnel. As a result of this review the snubber was declared inoperable. In accordance with the Technical Specification requirements an evaluation to determine the operability of the RHR system was initiated. The evaluation, completed on April 15, 1994, determined that the affected RHR system remained operable although the degraded anchor bolts rendered the snubber inoperable.

This event is being reported in accordance with the requirements of 10CFR50.73 (a) (2) (i) (c) in that on March 18, 1994, an inoperable snubber was not restored to operability nor was an evaluation of system operability performed within the time constraints allowed by Technical Specification 3.7.5.