



Carolina Power & Light Company

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

JUN 20 1994

SERIAL:BSEP 94-0229  
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 VIOLATIONS

Gentlemen:

On June 2, 1994, the Nuclear Regulatory Commission (NRC) issued a Notice of Violations for the Brunswick Steam Electric Plant, Units 1 and 2. The basis for the violations are provided in NRC Inspection Report 50-325/94-09 and 50-324/94-09. 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 Violations in accordance with the provisions of 10CFR2.201.

Please refer any questions regarding this submittal to Mr. R. P. Lopriore at (910) 457-2212.

Very truly yours,

J. Cowan, Director-Site Operations  
Brunswick Nuclear Plant

SFT/

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

9406240209 940620  
PDR ADDCK 05000324  
Q PDR

LEO  
11

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

During an NRC inspection conducted on April 6 - May 6, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1 (a) requires that written procedures shall be established, implemented, and maintained covering the activities recommended in Regulatory Guide 1.33, Appendix A, November 1972. Regulatory Guide 1.33, Appendix A, paragraph 8, recommends procedures for surveillance tests, inspections, and calibrations.

Surveillance Procedure, 1-MST-RCIC22M, Reactor Core Isolation Cooling (RCIC) Steam Line Low Pressure Instrument Channel Calibration, Revision 8C, Steps 7.5.22 and 7.5.32 requires two voltmeters be used to perform the calibration test.

Contrary to the above, on April 18, 1994, a licensee technician used a single voltmeter to perform the calibration test and this resulted in a RCIC isolation.

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

- B. Technical Specification 3.7.5 requires that an inoperable snubber be replaced or restored to operable status and an engineering analysis be performed, or the system be declared inoperable within 72-hours.

Contrary to the above, the licensee discovered that RHR Snubber 2-E11-69SS574 had defective anchor bolts on March 18, 1994. The snubber was not repaired and an engineering analysis was not performed. The snubber anchor bolts were replaced on May 6, 1994.

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

RESPONSE TO VIOLATION A:

Admission or Denial of Violation

CP&L admits the violation.

Reason for Violation

The inadvertent RCIC isolations resulted from personnel error and the failure to follow verbatim procedural requirements. Further details regarding this event were provided in LER 1-94-07, dated May 13, 1994.

Corrective Actions Which Have Been Taken and Results Achieved

Disciplinary action has been administered to the individuals involved with the event.

Meetings were held with the Unit 1 Instrumentation and Control (I&C)/Electricians to communicate the expectations for procedural compliance, the use of the proper tools or equipment for the job, and "Stop, Think, Act, Review" (STAR) self-checking techniques. In addition, a letter was issued to Unit 1 Instrumentation and Control (I&C)/Electrical supervisors to clearly delineate management expectations regarding pre-job briefs and performance of surveillances.

The Unit 1 I&C/Electrical Sub-Unit has been realigned to improve the quality of supervisory oversight and sub-unit communications and teamwork. The five crews comprising the sub-unit are no longer aligned according to discipline, (i.e., Surveillance, Electrical, Reactor, etc.). Crew personnel were selected to ensure that comparable talent and experience levels exist among the crews. As a result of the sub-unit alignment maintenance surveillance tests are now performed by all five crews. To facilitate this transition, a surveillance test observer/consultant has been temporarily assigned to provide lessons learned to each crew during the test preparation. Additionally, the observer/consultant will observe test performance to ensure proper techniques are used and high standards are maintained.

Corrective Steps Which Will Be Taken to Avoid Further Violations

A self-assessment is in progress for Unit 1 maintenance surveillance performance. A team has been formed to solicit input from top performing utilities, and review industry practice, operational experience feedback, and INPO Good Practices. This is expected to be completed in July of 1994. The results of the assessment will then be compared with Unit 2 maintenance surveillance performance to determine whether Unit 2 surveillance performance enhancements are needed.

The effectiveness of the corrective actions associated with the failure to follow procedure as addressed in Violation A will be evaluated by February of 1995.

Date When Full Compliance Will Be Achieved

Carolina Power & Light believes that it is in full compliance.

RESPONSE TO VIOLATION B:

Admission or Denial of Violation

CP&L admits the violation.

Reason for Violation

On March 18, 1994, craft 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.

Further details regarding this event were provided in LER 2-94-07, dated June 2, 1994.

Corrective Actions Which Have Been Taken and Results Achieved

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

The appropriate work 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.

Corrective Steps Which Will Be Taken to Avoid Further Violations

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

Date When Full Compliance Will Be Achieved

Carolina Power & Light believes that it is in full compliance.

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 |
|---|--------------------------|
| 1. A self-assessment is in progress for Unit 1 maintenance surveillance performance. The team is to solicit input from top performing utilities and review industry practice, operational experience feedback, and INPO Good Practices. This is expected to be completed in July of 1994. The results of the assessment will then be compared with Unit 2 maintenance surveillance performance. | 7/31/94                  |
| 2. The effectiveness of the corrective action associated with the failure to follow procedure as addressed in Violation A will be evaluated by February of 1995.  | 2/28/95                  |
| 3. The appropriate work planners will complete formal planner analyst training by the end of the fourth quarter of 1994.  | 12/31/94                 |