CP&L

Carolina Power & Light Company

Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461-0429
January 31, 1984

FILE: B09-13510C
SERIAL: BSEP/84-0250

Mr. James P. O'Reilly, Administrator
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street N.W.
Atlanta, GA 30303

Dear Mr. O'Reilly:

SUBJECT: Status of Investigation Surrounding LER 2-83-95

In a letter to your office dated January 13, 1984, Serial No. BSEP/84-0101, it was conveyed that a current status of the investigation to date involving LER 2-83-95, along with revised dates for the submittal of an action plan and completion of the investigation, would be submitted to your office by January 31, 1984.

Our investigation, as of mid-January 1984, has focused on the determination of why the Brunswick Steam Electric Plant (BSEP) mechanical seal (Link Seal) fire-rating deficiency was not identified during the Appendix A review process. Our Architect Engineer (A/E) involved in the Appendix A review has researched his historical files to determine if the deficiency was recognized at that time. Preliminary results from this review indicate that the deficiency was not recognized. The A/E has been requested to provide the results of his review in writing. Carolina Power & Light Company (CP&L) plans on supplementing the A/E review with a review of our in-house historical project files to determine if the deficiency was recognized in-house. Upon completion of these reviews CP&L will assess, based on the facts available, the primary and contributory factors involved in the failure to recognize or correct this deficiency.

A project has been initiated to research the licensing, design, and construction documentation associated with the fire barrier penetration seals in use at BSEP and identify any potential deviation from CP&L's licensing commitments relevant to Branch Technical Position (BTP) APCSB 9.5-1, Appendix A. In an ongoing parallel effort, the "as-built" configurations of mechanical (piping) seals installed at BSEP are presently being verified and documented. The output from this task will be integrated into the overall penetration seal documentation review. "Penetration seals," in the context of this investigation, encompasses mechanical/piping seals, conduit-to-pipe sleeve seals, cable-to-conduit seals, and HVAC fire dampers. Documentation being reviewed to support this task includes, but is not necessarily limited to, licensing commitments, modification packages, design basis documents, design specifications, procurement documents, vendor drawings and fire test reports, construction work procedures, construction drawings, and applicable elements of the BSEP Fire Protection Program.

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BSEP FIRE SEAL EVALUATION PROJECT
SCHEDULE SUMMARY

Phase 1

The first phase of the project consists of two efforts. The first of these efforts is the review of CP&L licensing commitments relative to BTP 9.5-1, Appendix A fire seal requirements. The second is the determination of the fire seal configuration at BSEP by review of pertinent design and installation documentation. The basic project schedule will encompass about eight weeks and will culminate in a written response which defines apparent discrepancies between the BSEP licensing commitments and the plant configuration as determined by design and installation documentation.

During the first four weeks of the project, the following tasks will be completed or under way:

- Review of BTP 9.5-1, Appendix A requirements for fire seals and dampers.
- Compilation of BSEP licensing commitments for seals and dampers.
- Review and compilation of plant design and installation documentation for seals and dampers.

During the second four weeks of the project, the following tasks will be completed:

- Review of plant pipe penetration installation documentation.
- Preparation of a report which defines apparent discrepancies between BSEP licensing commitments and the plant design and installation configuration.
- Provision of a basis for JCOs, if needed.

Phase 2

The second phase of this project will be directed at the resolution of any discrepancies that may be identified during the documentation review.

A specific plan and schedule will be developed for Phase 2 based on the Phase 1 results.

Initially, the status of CP&L licensing commitments relevant to penetration seals at BSEP is being reviewed in conjunction with the applicable penetration seal design criteria to verify that seal designs have consistently been developed in accordance with the original or modified licensing commitments. Subsequently, the seal design and fabrication/installation criteria will be reviewed, with respect to the installed configurations, to ensure that implementation has been consistent with the appropriate design criteria. The design criteria to be considered include those applicable to the original BSEP plant design and those applied following the implementation of Appendix A to BTP 9.5-1. The enclosed BSEP Fire Seal Evaluation Project Schedule Summary outlines the current project scope and schedule.

A supplemental response will be provided by March 16, 1984, which will provide the following:

1. A summary of the deficiencies between current installation and our current Appendix A commitment relative to the type of fire barrier penetrations in question.

2. The conclusion of our investigation into the failure to recognize or correct the mechanical seal penetration (Link Seal) fire-rating deficiency.

Additionally, an action plan for correcting any deficiencies will be submitted by May 1, 1984.

Currently all areas with potential barrier penetration inadequacies have fire watches provided in accordance with technical specifications until resolution of the barriers adequacy is reached.

Very truly yours,

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

MJP/mcg/LETCG2

Enclosure

cc: Mr. R. C. DeYoung
NRC Document Control Desk