

August 28, 1995

Carolina Power & Light Company
ATTN: Mr. R. A. Anderson
Vice President
Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461

SUBJECT: NRC INSPECTION REPORT NO. 50-325/95-10

Dear Mr. Anderson:

We have completed our review of your response of June 22, 1995, to our Notice of Violation issued on May 25, 1995, concerning activities conducted at your Brunswick facility. We have examined your response and found that it meets the requirements of 10 CFR 2.201.

In your response, you denied Violation A and admitted Violation B.


After careful consideration of the bases for your denial of violation A, we have concluded, for the reasons presented in the enclosure to this letter, that the violation occurred as stated in the Notice of Violation. Therefore, in accordance with 10 CFR 2.201(a), please submit to this office within 30 days of the date of this letter a written statement describing steps which have been taken to correct Violation A and the results achieved, corrective steps which will be taken to avoid further violations, and the date when full compliance will be achieved.

We will examine the implementation of your actions to correct Violation B during future inspections.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

We appreciate your cooperation in this matter.

Sincerely,


Ellis W. Merschoff, Director
Division of Reactor Projects

Docket No.: 50-325
License No.: DPR-71

Enclosure: Evaluations and Conclusion

cc w/encl: (See page 2)

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NAME	Starefos:tj	CPatterson	DVerrelli	DMatthews	BUryc	JB Fewell	
DATE	08/24/95	08/24/95	08/24/95	08/24/95	08/25/95	08/15/95	
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	

EVALUATIONS AND CONCLUSION

On May 25, 1995, a Notice of Violation (Notice) was issued for a violation identified during a routine NRC inspection. Carolina Power & Light Company responded to the Notice on June 22, 1995. The licensee denied Violation A. The NRC's evaluations and conclusion regarding the licensee's arguments are as follows:

Restatement of Violation A

10 CFR 50, Appendix B, Criterion VII, (Control of Purchased Material, Equipment, and Services) requires that the licensee maintain control of purchased goods and services and the effectiveness of the control of quality by contractors.

Contrary to the above, these requirements were not met for the following four examples during contractor services provided for the Unit 1 control blade pins and rollers replacement, eventually resulting in the termination of the project:

1. On April 11, 1995, care was not used to avoid contact of other structures during movement of a control rod blade to a curb hanger storage location. A blade contacted a fuel rack containing fuel tilting the blade to the pool wall about 18 inches away where the blade stopped in an unhooked condition.
2. On April 12, 1995, care was not used to avoid contact of other structures during movement of a control rod blade to a curb hanger location. A blade contacted a pipe just beneath the storage location tilting the top of the blade against a fuel rack where the blade stopped in an unhooked condition.
3. On April 19, 1995 a clear plexiglass viewing box used during the control rod blade pin and roller replacement was not properly secured to prevent it from being drawn into the Spent Fuel Pool skimmer surge tank.
4. On April 23, 1995, independent verification of control blade movement was not adequately performed to prevent an incorrect blade from being moved from its storage location in the pool.

Summary of Licensee's Response

The licensee contends that appropriate measures were provided to assure proper conformance to the Pins and Rollers Project contract through self-identifying problems and implementing corrective actions. Each of the four examples were self-identified, documented, and assessed through their corrective action program. This resulted in termination of the project.

ENCLOSURE

NRC Evaluation

The NRC staff has carefully reviewed the licensee's response and has concluded that the licensee did not provide any information that was not already considered in determining the significance of the violation.

CP&L is required to establish measures which assure expectations are met. CP&L provided the plant procedures for movement of the control rod blades and spent fuel pool conditions for the contractors' use during contracted evolutions. The licensee's root cause analysis for the control rod blades becoming unhooked, identified a possible scenario which addressed the blade not being properly latched. The blade could be lifted and moved without the blade properly seated in the hook and secured with the safety latch. The licensee demonstrated this in their training center. The licensee revised the procedure that the contractor was using to ensure verification/validation, with an underwater camera, that the blade was properly latched.

The NRC does not agree with the licensee conclusions for the April 12, 1995, event which indicated that movement of the remaining CRBs was completed with no similar incident. A similar incident where a blade became unhooked occurred on April 13, 1995. Again, a possible scenario was that the blade was not properly latched.

Furthermore, water turbulence in the spent fuel pool caused by running the supplemental fuel pool cooling system complicated the pins and rollers project. This was a measure established by the licensee which could have caused blade or hook motion contributing to the unhooking of the blades. This was also a factor in the event where the viewing window was drawn into the skimmer surge tank.

The fourth example of the violation involved independent verification (IV) of the blade movement. There was not a clear understanding by the contractor when the IV was required in the licensee's procedure.

All of the four examples occurred between April 12 and April 23, 1995, indicating that the established measures were not effective for the control of quality. These events were significant because of the potential for a dropped blade to damage spent fuel in the pool or rupture the fuel pool liner.

NRC Conclusion

CP&L is charged by the regulations with establishing measures which are effective and assuring that the activities are controlled. The controls were not adequate due to the unsatisfactory results displayed.

ENCLOSURE