

Official File Copy

MAR 24 1992

Docket Nos. 50-325 and 50-324
License Nos. DPR-71 and DPR-62
EA 92-024

Carolina Power and Light Company
ATTN: Mr. Lynn W. Eury
Executive Vice President
Power Supply
Post Office Box 1551
Raleigh, North Carolina 27602

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY - \$100,000
(NRC INSPECTION REPORT NOS. 50-325/92-01 AND 50-324/92-01)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by Mr. R. Prevatte on January 4-31 and February 3, 1992, at the Brunswick Steam Electric Plant. The inspection included a review of the facts and circumstances related to the use of an inadequate maintenance procedure during cleaning activities on emergency diesel generator (EDG) No. 2 which consequently resulted in the failure of the EDG to start on demand on January 6, 1992, while Unit 1 was at 20 percent power and Unit 2 was at 100 percent power. The report documenting this inspection was sent to you by letter dated February 13, 1992. As a result of this inspection, a violation of NRC requirements was identified. An enforcement conference was held on March 3, 1992, in the NRC Region II office to discuss the violation, its cause, and your corrective actions to preclude recurrence. A summary of the conference was sent to you by letter dated March 4, 1992.

The violation in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) involved an inadequate maintenance procedure which was used by plant services maintenance personnel to clean EDG No. 2 in preparation for painting. The procedure was inadequate in that it had not been properly evaluated to determine whether the materials and processes used to clean EDG No. 2 would impact the operability of the diesel generator or would otherwise constitute an unreviewed safety question. On January 3, 1992, with EDG No. 2 in operable status, plant services personnel, using a degreasing solvent with water, proceeded to spray the left side of EDG No. 2. Though the procedure required that the fuel control racks be lubricated after cleaning, the procedure did not contain a signoff step, and following receipt of notification that the cleaning was complete, maintenance personnel decided that the lubrication of the fuel control racks could be done on the morning of January 6, 1992. As a result, the cleaning solvent dried leaving a residue which formed a crystalline adhesive bond that effectively disabled the fuel control racks by mechanical binding. On January 6, 1992, with reactor power at 20 percent, an overspeed test was performed on the Unit 2 Main Turbine Generator. As the turbine was tripped, reverse power and diesel auto start alarms were received; however, EDG No. 2

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failed to start. Subsequent investigation revealed that EDG No. 2 fuel control racks were not moving and when a mechanic pushed the manual control lever on the fuel control racks to move them, the EDG started.

In this case, there was no loss of offsite power and EDG Nos. 1, 3, and 4 did start, as designed, on receipt of the diesel auto start signal. Other safety issues become evident when consideration is given to the effect of spraying diesel generator electrical systems with solvent, particularly when the personnel involved in such activity may not have the requisite knowledge or procedural guidance regarding the constraints on such activity. This event is seen as a continuation of significant problems related to work control that have yet to be adequately resolved.

The significance of this violation, and the basis of NRC's concern, is not focused on the diesel generator, but centers on the apparent inability of Carolina Power and Light Company management to properly and consistently control work on components and systems at the Brunswick Steam Electric Plant that are important to safety. On August 30, 1990, escalated enforcement action (EA 90-130) was issued with a proposed civil penalty of \$62,500 to emphasize the importance of proper work control and job planning associated with activities related to the installation of a traversing incore probe on July 5, 1990. On November 30, 1990, a Severity Level III violation (EA 90-154) was issued for the failure to follow procedures and the subsequent inaccurate completion of procedural requirements associated with a maintenance surveillance test. On March 26, 1991, EA 91-023 was issued with a proposed civil penalty of \$50,000 for violations involving the failure to follow procedures related to a calibration test of a process computer point on the feedwater control system. On May 31, 1991, EA 91-045 was issued with a proposed civil penalty of \$87,500 for violations involving the failure to follow procedures. On January 3, 1992, EA 91-158 was issued with a proposed civil penalty of \$125,000 for violations involving inadequate corrective action related to work control and independent verification inadequacies.

Therefore, in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy) 10 CFR Part 2, Appendix C (1991), this violation raises a significant regulatory concern and has been categorized at Severity Level III. To emphasize the importance of ensuring that proceduralized work controls are adequate, I have been authorized, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Nuclear Reactor Regulation, Regional Operations and Research, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of \$100,000 for the Severity Level III violation. The base value of a civil penalty for a Severity Level III violation is \$50,000.

The escalation and mitigation factors in the Enforcement Policy were considered. The self-disclosing nature of the event did not warrant escalation or mitigation for identification and reporting. As to corrective action to prevent recurrence, immediate corrective action was taken to correct the diesel generator operability problem. However, your long-term corrective action to address overall work control problems is essentially similar to your past corrective action that has not been proven particularly effective. In addition, it appears to the NRC staff that you have mischaracterized the root cause of the problem as failure to

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require a post-maintenance test as opposed to failure to adequately evaluate whether the planned activity would constitute an unreviewed safety question and take actions as appropriate. Therefore, your corrective actions do not warrant mitigation. Escalation of 100 percent was warranted for past performance which reflects a history of the continuing problem related to work control. The other adjustment factors in the policy were considered and no further adjustment to the base civil penalty is considered appropriate. Therefore, based on the above, the base civil penalty has been increased by 100 percent.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are 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.

Should you have any questions concerning this letter, please contact us.

Sincerely,

Original Signed By:
Stewart D. Ebnetter

Stewart D. Ebnetter
Regional Administrator

Enclosure:
Notice of Violation and Proposed
Imposition of Civil Penalty

cc w/encl:
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State of North Carolina

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NRC Resident Inspector
 U.S. Nuclear Regulatory Commission
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