

April 29, 1992

Docket Nos. 50-325, 50-324
License Nos. DPR-71, DPR-62

Carolina Power and Light Company
ATTN: Mr. R. A. Watson
Senior Vice President
Nuclear Generation
P. O. Box 1⁵¹
Raleigh, NC 27602

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-325/92-10 AND
50-324/92-10

This refers to the special engineering, technical support and corrective actions inspection conducted by the U. S. NRC Region II at your Brunswick facility from March 30 - April 10, 1992. At the conclusion of the inspection, findings and observations were discussed with those members of your staff identified in the enclosed inspection report.

The objective of this inspection was to assess current Brunswick performance in the areas of engineering, technical support, and corrective actions and to make comparisons with the performance that existed at the time of the NPC Diagnostic Evaluation in May 1989. The inspection team reviewed organizational and personnel changes, material upgrades to the service water system, engineering backlogs, operating performance improvements, effectiveness of corrective actions, and effectiveness of support to maintenance and operations. Within these areas, the inspection consisted of interviews with personnel, observations of activities in progress, reviews of selected procedures and supporting documentation.

In response to the 1989 Diagnostic Evaluation, several engineering and plant improvements were implemented. Communication between site and corporate groups was improved. The educational level and system knowledge of system engineers had increased. Material improvements and replacements were made to several systems including the service water system. The ongoing Design Basis Document program was producing reliable design basis information that was accessed by both corporate and site engineering groups. However, this inspection also revealed that many performance weaknesses observed during the DET were still present in 1992. The licensee was still not learning from past experience. As a result, timeliness and effectiveness of corrective actions, equipment failures, and personnel/maintenance errors have continued to occur. For example, LER analysis ranked the Brunswick units at or near the bottom of their peer group of

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23 boiling water reactors. Inappropriately modified anchor and through-wall bolting was discovered in the emergency diesel building which led to both units being shut down following the inspection, several examples of untimely corrective actions were noted, poor root cause analysis was performed, and there was a mismatch between the amount of existing work backlog and the amount of human and financial resources dedicated to resolve the issues in a timely manner.

Based on the results of this inspection, one apparent violation was identified and is being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action" (Enforcement Policy), 10 CFR Part 2, Appendix C (1992). Accordingly, no Notice of Violation is presently being issued for these inspection findings. The apparent violation encompasses three examples of ineffective corrective actions. Please be advised that the characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review.

An enforcement conference to discuss this apparent violation has been scheduled for May 6, 1992. The purposes of this conference will be to discuss the apparent violation, its cause and safety significance; to provide you the opportunity to point out any errors in our inspection report; to provide an opportunity for you to present your proposed corrective actions; and to discuss any other information that will help us determine the appropriate enforcement action in accordance with the Enforcement Policy. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the apparent violation is required at this time.

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.

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

Sincerely,

(ORIGINAL SIGNED BY A. F. GIBSON)

Albert F. Gibson, Director
Division of Reactor Safety

Enclosure:
NRC Inspection Report

(cc w/encl - See page 2)

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