



Carolina Power & Light Company

Brunswick Nuclear Project  
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JUN 5 1992

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U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1  
DOCKET NO. 50-325  
LICENSE NO. DPR-71  
SUPPLEMENTAL RESPONSE TO VIOLATION 90-48-01 AND  
IER 91-32

Gentlemen:

During the week of October 21-25, 1991, inspection 91-32 of the Brunswick Steam Electric plant was conducted. In the ensuing inspection report, a supplemental response was requested regarding a response to a Notice of Violation 50-325/90-48-01, "Recording of Radiographic Indications".

SL-4 Violation 50-325/90-48-01, "Recording of Radiographic Indications" states that paragraph T-292 of the ASME Code was violated by not recording relevant but acceptable indications.

CP&L continues to maintain that the ASME Code does not require the recording of acceptable relevant non-linear indications on a radiographic report.

ASME Code interpretation V77-06 (Attachment 1) indicates that the records of radiographs, showing only acceptable flaws, indications, discontinuities, etc., need only list the radiograph as being acceptable and that the ASME Code does not require that the individual flaws be documented.

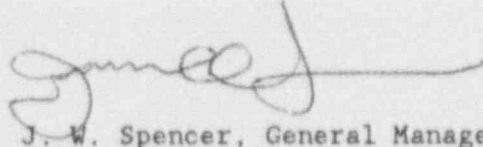
The above cited ASME Code interpretation was modified by an ASME Section III Interpretation III-1-78-07 (May 13, 1982) which indicated that for Section III work, accessible "linear" indications that require evaluation to determine acceptability shall be recorded and disposed on the report form.

The indications cited by the NRC inspectors are three rounded indications each less than 3/32" maximum dimensions. These indications, although greater than 1/32" (the minimum size of a relevant rounded indication for this pipe wall thickness) are not of a reportable size, and therefore, are not required to be recorded on the Radiographic Inspection Report.

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Very truly yours,

A handwritten signature in dark ink, appearing to read "J. W. Spencer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

J. W. Spencer, General Manager  
Brunswick Nuclear Project

RK/

Enclosure

cc: Mr. S. D. Ebnetter  
Mr. R. H. Lo  
BSEP NRC Resident Office