

CP&L

Carolina Power & Light Company

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Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461-0429
August 21, 1984

FILE: B10-13510E
SERIAL: BSEP/84-1829

Mr. James P. O'Reilly, Administrator
U.S. Nuclear Regulatory Commission
Region II, Suite 2900
101 Marietta Street N.W.
Atlanta, GA 30323

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 & 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly.

The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/84-13 and 50-324/84-13 and finds that it does not contain information of a proprietary nature.

This report identified two items that appeared to be in noncompliance with NRC requirements. Enclosed please find Carolina Power & Light Company's response to the two violations.

Very truly yours,

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

TEC/mcg/LETG2

Enclosure

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Violation 1

Technical Specification 6.8.1.a for Units 1 and 2 requires that written procedures shall be established, implemented, and maintained covering administrative procedures.

Contrary to the above, the administrative procedure covering implementation of technical specification changes, AI-09.1, was not adequately implemented in that procedure identification change forms were not routed to all responsible groups. This led to four new surveillance requirements added to the technical specifications by amendments 68 and 94 to the operating license of Units 1 and 2 to exceed the required monthly performance frequency. The amendment was issued March 20, 1984, and testing was not complete until May 25, 1984.

This is a Severity Level V violation (Supplement 1).

Response

1. Admission or Denial of the Alleged Violation

Carolina Power & Light Company agrees that the violation occurred as stated.

2. Reason(s) for the Violation

This deficiency resulted from an error in the administrative process involving distribution of the Procedure/Modification/Setpoint Change forms (AI-09.1, Attachment 4) after receipt of the technical specification amendments involved. These forms provide for formal notification of the amendment receipt to the appropriate plant groups. The error in the distribution resulted in the responsible Instrumentation & Control Supervisor not being notified of the amendment and hence the required procedures/procedure changes were not prepared.

3. Corrective Actions Taken and the Results Achieved

- a. Upon discovery of the lack of timely surveillance performance, the equipment involved was declared inoperable and appropriate actions required by the technical specification were implemented.
- b. The required procedures/procedure changes were prepared and the surveillance requirements were completed by May 26, 1984.
- c. The individual responsible for the error in the distribution has been instructed in the need to pay close attention to detail in the processing of technical specification amendment packages.
- d. The supervisor responsible for the delay in the distribution package has had his performance reviewed relative to this event.

- e. Technical specification amendments received in 1984 were reviewed for similar type deficiencies that resulted in this event. No additional instances of excessive delay in implementation were identified.
- f. Prior to the occurrence of this event, CP&L had identified weaknesses in the process involving technical specification amendment implementation. This process was upgraded by the implementation of procedures requiring an up-front review and identification of required changes with appropriate tracking. However, this process was not applied to pre-1984 submitted technical specification amendment requests. After the identification and investigation of the facts contributing to this event, those outstanding amendment requests issued prior to 1984 were reviewed for required procedure changes and appropriate tracking was initiated.

4. Corrective Action to Be Taken to Avoid Recurrence

- a. Additional reviews of previously reviewed technical specification amendments are being performed to identify any further weaknesses in the administrative process for ensuring timely implementation of technical specification amendments.
- b. Based on the results of 4.a above, administrative controls will be strengthened if necessary.

5. Date for Full Compliance

- a. Full compliance has been achieved relative to this violation.
- b. The reviews and any necessary revisions to administrative controls discussed in Item 4 above will be completed by November 1, 1984.

Violation 2

10CFR50, Appendix B, Criterion V requires activities affecting quality shall be accomplished in accordance with instructions, procedures, or drawings.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that:

1. Surveillances required by Section 7.1 of QAP-302, Surveillance of Technical Specifications, were not accomplished on all technical specification changes as described in the procedure.
2. On March 12, 1984, the required audit of Section 7.1 of QAP-302 as specified on the Performance Evaluation Unit checklist for audit QAA-126-4 was not accomplished.

This is a Severity Level V violation (Supplement 1).

Response

1. Admission of Denial of the Alleged Violation

Carolina Power & Light Company agrees that the violation occurred as stated. For Example A, CP&L considers that this violation is mitigated by the fact that, as stated in the report, the QA Surveillance Unit had performed another review that verified technical specification implementation through December 15, 1983, although that review was not a surveillance.

2. Reason for the Violation

Example A

The program for initial screening evaluation and reporting of technical specification amendment surveillances was not sufficient to ensure the surveillances were being conducted in a timely manner. No specific time for performance of the surveillance was specified. Cognizant surveillance personnel perceived the plant program for technical specification amendment implementation to be strong and emphasis of QA resources was placed in other areas. The volume of amendments being issued the previous six months was also a factor.

Example B

The Performance Evaluation Unit (PEU) audit QAA/126-3, conducted August 8-12, 1983, reported a nonconformance (finding) which indicated a significant backlog in QA/QC surveillances. This audit finding was closed based on projected changes to the surveillance program and applicable procedure QAP-302. The subsequent audit, QAA/126-4, conducted March 12-16, 1984, indicated a significant backlog in surveillances still existed. However, the new surveillance program, which appeared to be capable of significantly reducing the backlog, had not been fully implemented; this was noted in the checklist, but was not reported as a nonconformance. Because of this condition (i.e., relative newness of the revised surveillance program), the auditor concentrated his efforts in the surveillance backlog area. The auditor did not audit the site QA/QC reviews of technical specification amendments, but reviewed only implementation of the listed technical specification surveillances.

3. Corrective Actions Taken and the Results Achieved

Example A

- a. QA management was aware of the backlog of amendments in early 1984, and was taking action, i.e., adding additional manpower, to reduce the backlog to an acceptable level. This additional manpower was in the approval process when this violation was identified. The additional manpower was added in early June and the backlog of amendments requiring surveillances has been eliminated with the exception of one amendment for which completion of implementation of the amendment is not anticipated before November 1984.

- b. A work practice has been established for QA surveillance of technical specification amendments within 45 days of issuance.
- c. The QA Supervisor reports the status of the amendment surveillance program to the Director QA/QC on a weekly basis.
- d. The other QA surveillance programs required by the Brunswick Improvement Program (BIP) have been evaluated for similar problems, and it was concluded that the BIP is being met in the other surveillance areas.
- e. QA procedure QAP-302 was revised, requiring the initial evaluation of the need for QA surveillance of technical specification amendments. Those amendments not requiring surveillance will be documented and those requiring surveillance will be identified for surveillance scheduling.

Example B

During reviews of completed audit checklists by the Performance Evaluation Unit Principal Specialist and the QA Services Manager, additional emphasis is being placed on items that require in-depth coverage during subsequent audits.

4. Corrective Action to be Taken to Avoid Recurrence

Not applicable, see Item 3.

5. Date When Full Compliance Will Be Achieved

Corrective actions to achieve full compliance have been implemented.