



Carolina Power & Light Company

Brunswick Steam Electric Plant

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BSEP-92-0005

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

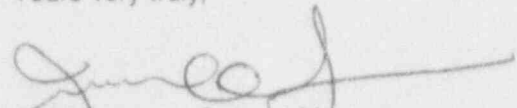
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REPLY TO NOTICE OF VIOLATION AND NOTICE OF DEVIATION

Gentlemen:

The Brunswick Steam Electric Plant has received NRC Inspection Report 50-325/92-14 and 50-324/92-14 and finds that it does not contain information of a proprietary nature. This report included a Notice of Violation and a Notice of Deviation.

Enclosed is Carolina Power & Light Company's response to that Notice of Violation and Deviation.

Yours very truly,


J. W. Spencer, General Manager
Brunswick Nuclear Project

SFT/

Enclosure

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

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ENCLOSURE

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NOS. DPR-71 & DPR-62
REPLY TO NOTICE OF VIOLATION AND
NOTICE OF DEVIATION

VIOLATION:

During an NRC inspection conducted on April 27 - May 29, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the Violation is listed below:

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures. Paragraph 2.4 of CP&L Engineering Procedure ENP-12 requires that an operability assessment be performed within 30 days of identification of deficiencies in safety related components and/or systems.

Contrary to the above, operability assessments were not performed within the 30 days period for deficiencies identified during 1991 in structural steel platforms construction. The time for completing the required operability assessments exceeded six months.

This is a Severity Level IV violation (Supplement I).

RESPONSE TO VIOLATION:

Admission or Denial of Violation:

Carolina Power & Light Company admits this violation.

Reason for the Violation:

As a result of commitments established to resolve the issues addressed by 50-325/88-035, Brunswick initiated the "As-Built Verification of Miscellaneous Steel" project, PCN-B0060A in July, 1990. The initial program consisted of the following major phases:

- Selection of six supplementary structural steel samples located in each unit's Reactor Building
- Development of a comprehensive procedure for as-built information.

- Assembly of loading information based on walkdown data
- Performance of engineering evaluations
 - Where deficiencies were encountered the necessary reconciliation would be performed
 - Where Short Term Structural Integrity criteria could be met an Engineering Evaluation would be developed per plant procedure
- Compilation in a report of the walkdowns and evaluations
- Development of a method for permanent retrievability of the supplemental structural steel as-built condition and evaluations

As evidenced by the aforementioned elements, operability assessments would be performed only after accumulating the data associated with a miscellaneous steel structure and then evaluating the overall condition. At that point, the requirement for completion of the evaluation within thirty days would be invoked if deemed appropriate. This interpretation of the requirements within ENP-12 was considered prudent and necessary to ensure proper assessment of deficiencies constituting potential operability concerns.

Following Site Review Group approval of the project funding, inspections were initiated in late 1990 and continued into 1991. Some of the deficiencies identified by the NRC and cited in Inspection Report 92-14 were also identified during these inspections. At the time of the NRC April 27, 1992 inspection, the evaluation phase of the project had not been completed due to limitations on resources.

Corrective Steps Which Have Been Taken and Results Achieved:

Due to concerns associated with the adequacy of the As-Built Verification of Structural Steel project, the project has been significantly enhanced. The enhanced program, retitled "Miscellaneous Steel Verification Program", was initiated in June of 1992. Details of the program components were communicated to the Division of Nuclear Reactor Regulations via Nuclear Licensing Section letter NLS-92-203, dated July 27, 1992. The enhanced program has been designed to include an engineering walkdown to support preliminary assessment of identified potential operability concerns. Phase One consists of an engineering walkdown of the miscellaneous steel outside the drywell. This walkdown is directed toward providing an immediate appraisal of miscellaneous steel members and connections. Phase One is approximately 36% complete. Phase Two of the program applies to both the drywell platform steel and the miscellaneous steel in the Reactor Building outside the drywell and consists of two parts. One part consists of a preliminary analysis of representative platform sections in the drywell and in the Reactor Building outside of the drywell. Part Two provides more detailed verification and documentation of miscellaneous structural steel. Phase Two is approximately 6% complete. CP&L management is committed to the Miscellaneous Steel Verification Program and has dedicated the necessary resources to ensure its completion as delineated in the aforementioned letter of commitment.

Corrective Actions That Will Be Taken To Avoid Further Violations:

Assessment of the deficiencies identified during the As-Built Verification of Structural Steel project 1990-1991 inspections will be performed prior to startup of the affected unit as a result of the Miscellaneous Steel Verification Program efforts. Those deficiencies identified as operability concerns will be either reconciled or repaired prior to the startup of the affected unit in accordance with the elements of the Miscellaneous Steel Verification Program.

The Brunswick Integrated Schedule (BIS) program will identify to the NRC projects such as that from LER 325/88-035 and provide a schedule for completion and a status update every six months. Consequently, reallocation of resources required to support major regulatory committed projects will not occur without CP&L management concurrence and NRC notification.

Date When Full Compliance Will Be Achieved:

Based on implementation of the Miscellaneous Steel Verification Program, CP&L is in compliance.

DEVIATION:

During the inspection conducted on April 27 - May 29, 1992, a deviation of written commitment was identified in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action", Part 2, Appendix C. The deviation is listed below:

FSAR Section 17.1.A.3.4.4.4., d.1 and d.3 states that all structural steel construction was inspected for conformance to American Institute of Steel Construction (AISC) specifications, and that field welds were visually inspected for conformance with AWS specifications.

FSAR Section 3.8.4.5.b states that structural steel was designed in accordance with AISC-1963 specifications.

Contrary to the above, structural steel construction was not adequately inspected for conformance with AISC specifications and field welds were not adequately visually inspected for conformance with AWS specifications. This is demonstrated by the presence of oversized and flame cut holes in structural steel connections, structural steel construction not in accordance with construction drawing requirements, and field welds which do not conform to AWS requirements or details shown on the structural steel construction drawings. Design evaluation of several structural steel platforms indicate that the stresses in the structural steel exceed AISC design allowable values.

RESPONSE TO DEVIATION:

Admission or Denial of Deviation:

Carolina Power & Light Company admits this deviation.

Reason for the Deviation:

The inspections performed to verify construction of miscellaneous steel during original plant construction were inadequate.

Corrective Steps Which Have Been Taken and Results Achieved:

The Miscellaneous Steel Verification Program has been initiated to ensure compliance with the design criteria delineated in the Brunswick Plant Updated Final Safety Analysis Report (FSAR). Due to the magnitude of miscellaneous steel the program is divided into two phases. Phase One consists of an engineering walkdown of the miscellaneous steel outside the drywell. This walkdown is directed toward providing an immediate appraisal of miscellaneous steel members and connections. Phase One is 36% complete. Phase Two of the program applies to both the drywell platform steel and the miscellaneous steel in the Reactor Building outside the drywell and consists of two parts. One part consists of a preliminary analysis of representative platform sections in the drywell and in the Reactor Building outside of the drywell. Part Two provides more detailed verification and documentation of miscellaneous structural steel.

In contrast to the level of requirements in effect during initial plant construction, specification and plant modification procedures have been enhanced to ensure adequate verification of civil attributes prior to turnover of newly installed miscellaneous steel structures.

Corrective Actions That Will Be Taken To Avoid Further Violations:

Phase One and the portion of Phase Two that will be completed prior to plant operation will provide a high confidence that the miscellaneous structural steel is adequate to function in a safe manner for defined enveloping plant loading conditions.

Those deficiencies identified as operability concerns will be either reconciled or repaired prior to the startup of the affected unit in accordance with the elements of the Miscellaneous Steel Verification Program.

Date When Corrective Actions Will Be Complete:

Phase One of the Miscellaneous Steel Verification Program will be completed prior to startup.

Completion of Phase Two of the Miscellaneous Steel Verification Program is scheduled for November 1983