



Carolina Power & Light Company

Brunswick Nuclear Project
P. O. Box 10429
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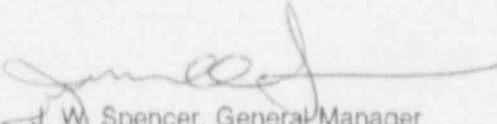
United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington DC 20555

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 92-19-01

Gentlemen:

The Brunswick Steam Electric Plant has received NRC Inspection Report 50-325/92-19 and 50-324/92-19 and finds that it does not contain information of a proprietary nature. This report included Notice of Violation 92-19-01.

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


J. W. Spencer, General Manager
Brunswick Nuclear Project

JWS/npt

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 NC3, DPR-71 & DPR-62

REPLY TO NOTICE OF VIOLATION 92-19-01

VIOLATION:

During an NRC inspection conducted on June 5 - July 3, 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, (1992), the Violation is listed below:

10 CFR 50 Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with documented procedures.

Engineering Procedure ENP-12, Engineering Evaluation Procedure, Revision 029 Section 2.2.1, requires that an Engineering Evaluation Report (EER) be prepared to evaluate and approve all temporary repairs to power plant systems or equipment. Section 4-9 of ENP-12 defines a temporary repair as a temporary change associated with corrective maintenance.

Contrary to the above, on January 24, 1992 a temporary non-code repair was made to a Service Water Lube Water (SWLW) line without obtaining a relief request via an Engineering Evaluation in accordance with plant procedures.

RESPONSE TO VIOLATION:

Admission or Denial of Violation:

Carolina Power & Light Company admits to this violation.

Reason for the Violation

On 1/24/92 a through wall pin-hole leak was discovered on line 1-SW-233-3/4-17A. This is the lube water supply line to the 1B Nuclear Service Water Pump and is an ASME Class III moderate energy line. Several days prior to the discovery of the leak, the lube water supply cyclone separator had failed with leakage occurring. In order to expedite replacement, a portaband was used to cut the bolts off the cyclone separator and pipe flange. The portaband slipped and nicked the 3/4" pipe near the flange, subsequently causing the through wall leak to appear several days later. Work Request/Job Order (WR/JO) 92-ABSK1 was written (by Operations) to repair the leak.

It was decided by Maintenance personnel to expedite a permanent code repair to the pipe. Tech Support and Operations were aware of this plan. Work was initiated immediately to fabricate a replacement flange and nipple. While the fabrication was being done it was decided to place a "spray deflector" on the pipe to mitigate the effects of the leak. MMM-003, Corrective Maintenance Procedure, Section 4.9.3 addresses the installation of spray deflectors which may be used "to slow the flow of water or to prevent water spray damage." It further states, "The spray deflector is not considered to be a temporary repair in this context." A rubber patch with a hose clamp is given as an example of a spray

deflector. Because the permanent repair was being pursued expeditiously, no tracking LCO was placed on the pipe leak. OI-4 (LCO Evaluation and Follow-up) requires a tracking LCO be initiated if operability is unclear. In this instance no LCO was initiated.

The flange and nipple were fabricated and Maintenance requested, through the Site Work Force Control Group (SWFCG), a window to perform the repair. Because lube water would need to be isolated to make the repair, a clearance would be required on the pump. Since the patch was not identified as a temporary repair and no tracking LCO existed, it was not recognized by Scheduling that the work was essential to fulfill code requirements. Therefore other Service Water work was given greater priority, no window was made available and the permanent repair was deferred. Also, due to an administrative error, the WR/JO was incorrectly classified as "Field Complete" in AMMS. (This has subsequently been corrected). Apparently while updating the database, a transposition of numbers occurred. Based on the volume of WR/JOs processed this is not considered significant. Since a tracking LCO was not generated Engineering was not contacted for an evaluation.

During an ISI inspection on 6/18/92, the patch was identified. A tracking LCO was placed on the pump (TI-92-0861) and operability of the pump was addressed by EER 91-199. The pump was determined to be operable with the spray deflector in place.

Summary and Conclusions

The spray deflector placed on the pipe by Maintenance was allowed by and in accordance with MMM-003. Because an expeditious permanent repair was being pursued and no tracking LCO established, Engineering was not contacted to perform an evaluation. When the permanent repair was deferred, no mechanism was in place to require evaluation of the leak and patch.

The violation occurred for the following reasons:

1. There was a reliance on personnel, rather than process to implement and track a required code repair.
2. OI-4 did not automatically require the initiation of a tracking LCO.

Corrective Steps Which Have Been Taken and Results Achieved

1. An evaluation was written (EER 92-0199) providing justification for the temporary repair and demonstrating operability of the line.
2. OI-4 has been revised, requiring an LCO for a through wall leak within the ISI boundary.

Corrective Actions That Will Be Taken to Avoid Further Violation

1. Implement a permanent code repair to line 1-SW-233-3/4-17A (WR/JO 92-ABSK1) prior to Unit 1 restart.

Date When Full Compliance Will Be Achieved:

Following completion of WR/JO 92-ABSK1, prior to Unit 1 restart.