



Carolina Power & Light Company

Brunswick Nuclear Project  
P. O. Box 10429  
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October 12, 1992

FILE: B09-13510C  
SERIAL: BSEP-92-028

10CFR2.201

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

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
SUPPLEMENTAL REPLY TO A NOTICE OF VIOLATION

Gentlemen:

The Brunswick Steam Electric Plant (BSEP) received NRC Inspection Report 50-31 92-21 and 50-324/92-21 and found that it did not contain information of a proprietary nature. The report included a Notice Of Violation.

Carolina Power & Light Company (CP&L) responded to the Notice Of Violation on September 21, 1992 (Serial: BSEP-92-020).

As documented in that response and discussed in a September 21, 1992, telephone conversation between Mr. H. O. Christensen - Chief Project Section 1A, Reactor Projects Branch No. 1, Division of Reactor Projects, and Mr. S. D. Floyd - BSEP Manager Regulatory Compliance, the response to Violation A, example 2 was to be supplemented by October 12, 1992.

Enclosed is Carolina Power & Light Company's supplemental response.

Very truly yours,

J. M. Brown, Plant Manager Unit 2  
Brunswick Nuclear Project

TMJ/

Enclosure

cc: Mr. S. D. Ebnetter  
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

VIOLATION A:

A. Technical Specification 6.8.3 a requires that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972 including procedures for performing maintenance.

1. Maintenance Procedure, MP-12, General Cleanliness Procedure, Revision 13, Section 5.4.2.3 requires that openings in hardware and piping shall be capped, covered, or plugged when not in use.

Contrary to the above, MP-12 was not properly implemented in that on July 10, 1992 the 2C conventional service water pump discharge check valve (2-SW-V13) was used as a work surface with the valve internals exposed resulting in maintenance debris being introduced to the internals.

2. Maintenance Management Manual OMMM-004, Preventive Maintenance, Revision 5, Section 5.1.3.14 requires that any deviations from manufacturer's recommendation should be handled in accordance with ENP-20. Section 5.0 states that a Preventative Maintenance (PM) exception form should be submitted as soon as it is determined a PM will not be performed. Engineering Procedure, ENP-20, Engineering Work Request (EWR), Revision 14c, Section 10, states that if action not taken deviates from the vendor's recommendation, a deviation form should be attached to the EWR package. This package requires two levels of engineering supervisory approval, Nuclear Assessment Department (NAD) review and Plant General Manager approval.

Contrary to the above, as of July 31, 1992, the licensee failed to obtain the two level engineering supervisory approval, the NAD review and Plant General Manager approval for deferring the preventive maintenance since 1983 on two safety-related 4160 volt circuit breakers.

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

## SUPPLEMENTAL RESPONSE TO VIOLATION A - EXAMPLE 2

### Admission or Denial of Violation:

CP&L admits that the Preventive Maintenance (PM) program is in need of improvements. As stated, the example is not entirely accurate; however, CP&L agrees that the process for controlling deferral of preventive maintenance is less than adequate and accepts the violation.

### Clarification of the Violation

The 4160 volt circuit breakers deferred from preventive maintenance since 1983 are not safety related and the ENP-20 process for approving deferral of PMs was not required.

Maintenance Management Manual, OMMM-004, Preventive Maintenance, revision 5, section 5.1.3.14 is not applicable to existing PM routes. Section 5.1 of OMMM-004 is entitled "General Information". Sub-section 5.1.3 establishes the criteria Maintenance personnel are to consider when establishing a schedule for new PM routes. 5.1.3.14 is the fourteenth criterion in sub-section 5.1.3. 5.1.3.14 requires that when schedules being established for new PMs deviate from that recommended by the manufacturer, the deviation should be handled in accordance with ENP-20. It does not require that deferrals of existing PMs be handled in accordance with ENP-20.

Deferrals of existing PMs are handled in accordance with section 5.9 of OMMM-004, entitled "Preventive Maintenance Exceptions". Section 5.9 does not refer back to ENP-20; therefore, the ENP-20 approvals were not required.

### Reason for the Violation:

Prior to the issuance of this violation, several sources internal to CP&L had identified concerns with the administration of the PM Program. As a result, adverse condition reports (ACRs) were initiated in accordance with the Corrective Action Program (CAP) and a root cause analysis (RCA) was initiated.

The RCA documents that the PM Program has existed since 1976 and has experienced various efforts to assess and enhance it. In 1982 approximately 110 new PM Procedures were developed which provided for in excess of 851 individual tasks. Subsequently, the PM Program has grown to approximately 20,000 individual tasks. However, an effective process was not in place to document the basis or coordinate the performance of the PMs. The result has been an inefficient, labor intensive, PM program which is difficult to assess or revise.

### Corrective Steps Which Have Been Taken and Results Achieved:

As an interim measure, by management directive, PM exceptions are being reviewed by Technical Support personnel. When a concern exists with the exception an EWR is initiated in accordance with appropriate engineering procedures.

### Corrective Steps Which Will Be Taken to Avoid Further Violations:

A three year improvement plan for the Brunswick Nuclear Project is being developed. The corrective steps which will be taken to improve the PM Program will be included in the plan when it is transmitted to the NRC.

### Date When Full Compliance Will Be Achieved:

CP&L is currently in full compliance.