

CP&L

Carolina Power & Light Company

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

October 25, 1985

FILE: B09-13510C
SERIAL: BSEP/85-1869

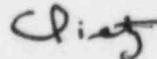
Dr. J. Nelson Grace, Administrator
U.S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street NW
Atlanta, GA 30323

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
SUPPLEMENTAL RESPONSE TO IE REPORTS 85-19 AND 85-22

Dear Dr. Grace:

In Carolina Power & Light Company's (CP&L) responses to IE Inspection Reports 324-325/85-19 (August 16, 1985, Serial No. BSEP/85-1461) and 324-325/85-22 (September 12, 1985, Serial No. BSEP/85-1593), CP&L committed to provide a supplemental response to address those violations which appeared to have generic implications. Our responses to those violations are enclosed.

Very truly yours,



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

RMP/jo

Enclosure

cc: NRC Document Control Desk

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IE Inspection Report 85-19; Violation 1, Example C

10CFR50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, and shall be accomplished in accordance with these instructions, procedures, and drawings.

Brunswick specification No. 248-107 requires that QC verifications shall be made to ensure that catalogue components identified and called for on the design drawings have been used in the support. Construction shall be responsible for ensuring that erection activities are in compliance with the design drawings. Procedure QCP-203 requires that QA/QC shall verify that all hardware, such as bolts, nuts, etc., is installed as shown on the design drawings. Missing hardware will be documented per procedure QCP-401.

Contrary to the above, activities affecting quality were not being accomplished in accordance with documented procedures and drawings in that a field inspection of 14 QC-accepted pipe supports revealed two supports with deviations from the documented requirements. Furthermore, deficiencies in the anchor bolt installation were also identified. The supports and the anchor bolts are listed below:

- C. Unit 2 safety-related steel frame at elevation 50 foot. One anchor bolt in each of the two baseplates was improperly installed in that there was no bearing contact between the nuts and baseplates.

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

Response

I. Admission or Denial of the Alleged Violation

CP&L acknowledges that one anchor bolt on each of the two baseplates was improperly installed in that there was no bearing contact between the baseplates and the nuts.

II. Reason for the Violation

The reason for these events could not be determined. It is believed that bolts were installed to help provide lateral support to the support members during installation. Engineering has reviewed the fastener problems identified by this violation, and has determined that the column baseplates are not moment connections; therefore, they do not represent a safety concern.

III. Corrective Steps Which Have Been Taken

Engineering personnel inspected the baseplate on the structural steel columns in both Reactor Buildings to identify and initiate corrective actions. Trouble tickets were written on those baseplates with similar deficiencies. As this has been identified as not being a safety concern, these trouble tickets are being planned and worked in accordance with plant procedures. To date, four trouble tickets have been completed and one remains to be worked.

IV. Corrective Steps Which Will Be Taken

Corrective actions required by this event have been taken.

IE Inspection Report 85-22; Violation 2

10CFR50, Appendix B, Criterion V, as implemented by FSAR Section 17.2.5, requires activities affecting quality be accomplished in accordance with drawings.

Contrary to the above, activities affecting quality were not accomplished in accordance with drawings in that control rod drive hydraulic control units on Unit 2 were not installed per drawing. Four units were found with loose bolting and one unit had two out of four rack-support-to-foundation bolts missing.

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

Response

I. Admission or Denial of the Alleged Violation

CP&L acknowledges that activities affecting quality were not accomplished in accordance with drawings in that several control rod drive (CRD) hydraulic control units on Unit 2 had loose or missing bolts.

II. Reason for the Violation

Personnel in the Brunswick Engineering Support Unit, the Brunswick Construction Unit, and the Brunswick Mechanical Maintenance Unit were contacted concerning the question of how these bolts became loose or missing. These groups indicated that the bolts would not have been loosened or removed without proper documentation and authorization. In addition, a historical search was conducted through plant records, which included the related plant modifications, trouble tickets, and the original turnover package for the CRD System. In reviewing this data, no correlation could be made between the missing or loose bolts and the work which was conducted. The original turnover package for the installation of the HCUs contains a mechanical inspection report which indicates the mechanical systems on the CRD System were satisfactory.

III. Corrective Steps Which Have Been Taken

The system engineer walked down the HCU racks on both units to investigate the loose/missing bolts concern. Trouble tickets were immediately written to correct the observed discrepancies (approximately 20 on Unit 2 and 38 on Unit 1). The problems identified included:

1. Tightening loose bolts
2. Replacing missing bolts
3. Replacing missing washers
4. Replacing missing directional control valve covers
5. Replacing rusted washers and bolts
6. Cleaning the general area of the HCU racks

This work has been completed on both units.

A seismic analysis was performed on the HCU with two foundation bolts missing. This analysis showed that the HCU foundation met at least the short-term criteria as defined in IE Bulletin 79-14. Continuing action for this is being tracked as unresolved Items 325/85-27-01 and 324/85-27-02.

IV. Corrective Steps Which Will Be Taken

Periodic walkdowns of the system are being performed by the system engineer to identify possible future problems. This, combined with good maintenance practices and current procedures, should prevent future problems with loose or missing bolts.

V. Date When Full Compliance Will Be Achieved

Full compliance has been achieved on this item.

In CP&L's initial responses to these events, extensions were requested in order that the generic implications could be reviewed. The generic implication review has been completed. Considering the large number of fasteners installed within both units, and the small number found loose or missing, CP&L does not feel that this is a generic problem. Current plant procedures contain sufficient safeguards to preclude problems of this type, including in many cases, QA verification. In addition, the system engineering program initiated this year will also ensure compliance. This program requires that, among other functions, each system engineer walk down his systems on some periodic bases (usually one during each working day). This system walkdown program identifies loose/missing bolts and appropriate trouble tickets are initiated for the problem to be corrected. Therefore, based on the large number of fasteners, and the small number of problems identified--in concert with plant procedures and system walkdowns, CP&L considers these events closed.