

Official

JUN 24 1988

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Senior Executive Vice President
Power Supply and Engineering
and Construction
P. O. Box 1551
Raleigh, NC 27602

Gentlemen:

SUBJECT: REPORT NOS. 50-325/87-42 AND 50-324/87-43

We have completed our evaluation of your March 9, 1988 response to our Notice of Violation issued on February 8, 1988, concerning activities at your Brunswick facility. After careful review of the basis for your denial of the cited Violation, we have concluded, for the reasons presented in the enclosure to this letter, the violation occurred as stated in the Notice of Violation. Therefore, pursuant to 10 CFR 2.201, please submit to this office within 30 days of the date of this letter, a written statement describing the reasons for the violation, the corrective steps which have been taken and the results achieved, corrective steps which will be taken to avoid further violations, and the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter is not subject to the clearance procedures for the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,

Original Signed by
Charles W. Hehl /for

Luis A. Reyes, Director
Division of Reactor Projects

Enclosure:
Evaluation of Violation Denial

cc w/encl:
P. W. Howe, Vice President
Brunswick Nuclear Project
C. R. Dietz, Plant General Manager

bcc w/encl: (See page 2)

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bcc w/encl:
NRC Resident Inspector
DRS, Technical Assistant
Document Control Desk
State of North Carolina

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RCarroll:er
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RF
PFredrickson
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DVerrelli
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ENCLOSURE

EVALUATION OF VIOLATION DENIAL

The cited violation (50-325/87-42-01 and 50-324/87-43-01) involved the closure and administrative "red tagging" of automatic containment penetration isolation valves in an attempt to meet the "secured/deactivated" requirements of Technical Specifications (TSs) 3.6.3 and 3.6.1.1. The crux of your denial to this violation is the apparent lack of specific written guidance provided by regulation in this area and the equivalency of control taken by your operations staff when they administratively "red tagged" the subject valves in lieu of physical deactivation.

Although a definition of the term "deactivate" relative to valves in the primary containment isolation system (PCIS) has not been documented, the intent of the use of this term in the TSs is considered to be obvious when considered within the context of the TSs and other documents related to the functional requirements of the PCIS. The requirements of isolating containment penetrations with two isolation valves in series are provided in General Design Criteria 55 and 56 in Appendix A to 10 CFR Part 50. These requirements ensure that an isolation barrier remains after a single active failure in the PCIS. Collectively, Brunswick TSs 3.6.3 and 3.6.1.1 address this requirement by providing alternative actions in the event that a PCIS valve is determined to be inoperable. The first priority is to return the inoperable valve to operable status. The third alternative (i.e., isolating the penetration with a closed manual valve or blind flange) removes the possibility for an active PCIS failure to result in an open containment penetration. The method used to deactivate an automatic PCIS valve, as required by both TSs, in order to provide protection equivalent to that described above can be understood by examining the guidance provided in Standard Review Plan (SRP) 6.2.4, "Containment Isolation System," for sealed closed barriers. SRP 6.2.4 states, in part:

Sealed closed barriers may be used in place of automatic isolation valves. Sealed closed barriers include blind flanges and sealed closed isolation valves which may be closed manual valves, closed remote-manual valves, and closed automatic valves which remain closed after a loss-of-coolant accident. Sealed closed isolation valves should be under administrative control to assure that they cannot be inadvertently opened. Administrative control includes mechanical devices to seal or lock the valve closed, or to prevent power from being supplied to the valve operator.

The guidance in SRP 6.2.4 is reinforced by ANSI Standard N271-1976, "Containment Isolation Provisions for Fluid Systems," which defines a sealed closed isolation valve as follows:

A valve that is in a closed position by administrative controls by any of the following methods:

- (1) A mechanical device sealing or locking the valve in the closed position.

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Enclosure

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- (2) A normally closed valve with a seal or lock on any manual override if present and a seal or lock on the power breaker or power source in a manner that prevents power from being supplied to the valve.

The term "seal" in the above definition is further defined as "a physical restraint such as a lead seal." As stated above, NRC considers that mechanical devices must be used on PCIS valves to ensure that they are sealed or locked closed, or that power cannot be supplied to the valve operator. Only then can the valve be considered a sealed closed barrier, and therefore, equivalent to redundant automatic isolation valves or a blind flange. Nowhere in the NRC guidance or ANSI Standard is the use of administrative tag-outs considered as an appropriate method for ensuring containment isolation.

Based on the above, it is the NRC's position that the practice of administrative "red-tagging" at Brunswick is not an acceptable method to meet the requirements of TSs 3.6.3 and 3.6.1.1. We therefore find that your denial is not justified and the violation occurred as stated.