CP&L

Carolina Power & Light Company

Brunswick Steam Electric Plant
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U.S. Nuclear Regulatory Commission
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BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO INFRACTION OF NRC REQUIREMENTS

Gentlemen:

The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/88-18 and 50-324/88-18 and finds that it does not contain information of a proprietary nature.

This report identified one item that appeared to be in noncompliance with NRC requirements. Enclosed is Carolina Power & Light Company's response to this violation.

Very truly yours,

S. L. Harness, General Manager
Brunswick Steam Electric Plant

MJP/mcg

Enclosure

cc: Dr. J. N. Grace
Mr. E. D. Sylvester
BSEP NRC Resident Office

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VIOLATION

Technical Specification 6.8.1.a requires that written procedures be implemented for the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972. Item H.2 of Appendix A requires procedures for technical specification surveillance testing. Item I.5 of Appendix A requires general procedures for the control of modification work.

Contrary to the above, such a procedure was not correctly implemented on May 17, 1988, in that, while performing Section 7.3.2 of surveillance test 1MST-PCIS38R, as required by Step 40.39 of Plant Modification 85-061-W, Step 7.3.2.15 was not performed, which required that test switch A71B-S56B be placed in the manual position.

This is a Severity Level V violation (Supplement I), applicable to Unit 1 only.

VIOLATION RESPONSE

I. Admission or Denial of the Alleged Violation

Carolina Power & Light Company acknowledges this violation as described.

II. Reason for the Violation

The involved plant modification Instrumentation & Control (I&C) technician, while performing the surveillance test for acceptance of the subject plant modification, restored test switch A71B-S56A to the "normal" position and the isolation signal was reset per MST Steps 7.3.2.11 and 7.3.2.12. Steps 7.3.2.13 through 7.3.2.13.3.5 of the MST (which involve time response calculations and determinations) were completed by the involved acceptance testing engineer over the next approximately 45 minutes. During this time, the I&C technician was obtaining a printed copy of the Emergency Response Facility Information System (ERFIS) computer data. Following completion of MST Step 7.3.2.13.3.5, the engineer instructed the I&C technician to continue with the MST and system restoration. While doing this, the involved I&C technician recalled that he had returned a test switch to "normal" prior to completing the subject steps of the MST. Seeing that the logic test light was on, indicating the system was not in "test," the I&C technician signed MST Step 7.3.2.15 (thinking he had just restored test switch A71B-S56B to the normal position) and continued on with the restoration of the system.

The ERFIS acceptance testing program was developed to utilize existing plant procedures as much as possible. Plant procedures which change valve and/or switch lineups require independent verification when the involved system is returned to the normal lineup. During normal performance (non-ERFIS acceptance testing), a complete test of the Group 1, Group 2, Group 6, and secondary containment isolation circuitry associated with one specific isolation logic (A, B, C, or D) was performed. At the completion of system logic testing, the independent verification steps are included to cover this testing. When the subject ERFIS test was written, only the portion of the MST associated with the Group 2 logic was extracted from the complete MST to test the ERFIS installation.

The Group 2 logic section was reviewed and found to satisfy the ERFIS acceptance testing requirements and also to return the system to the normal lineup. As the independent verification step was not included in the Group 2 logic section, it was inadvertently deleted from the steps called out in the plant modification acceptance tests. The combination of 1) the time frame between the switch restoration steps; 2) the switch numbers being identical except for suffixes A and B; 3) the logic test light being on; and 4) the lack of independent verification all contributed to the test switch not being restored to the normal position. In addition, had a requirement to return the test keys to the Control Room existed, another opportunity would have been provided to identify this problem.

The safety significance of this event is minimal, as leaving the subject switch in the "test" position provided one of the two required trip signals to the logic system for the affected primary containment isolation valve.

III. Corrective Steps Which Have Been Taken and the Results Achieved

Following discovery of this event, switch A71B-S56B was placed in "normal" position, thereby taking the logic out of "trip" position. ERFIS technicians and test engineers were reinstructed on the importance of double verification and initialing of procedure steps. As a result of this occurrence, the remaining ERFIS tests requiring logic switch manipulations were reviewed to ensure that restoration steps included double verification and were performed satisfactorily. Switch A71B-S56B was also tagged to reflect "normal-test" positions.

IV. Corrective Steps Which will be Taken to Avoid Further Violations and When Full Compliance will be Achieved

Cognizant engineers will be advised of problems with performing portions of a procedure and the need to properly identify restoration steps. This will be accomplished by adding this precaution to NED guidelines and will be completed by NED by November 30, 1988.

1 and 2 MST-PCIS38R will be revised to add a step to return keys as a qualitative enhancement of the MST by October 28, 1988.

Operations management will review the key control program and revise it as necessary to ensure positive control of keys. This will be completed by November 4, 1988.

Operations management will review the current methodology of Control Room back panel tours and revise the process as necessary to ensure positive attention is directed in those areas as deemed appropriate. This will be completed by November 4, 1988.