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Docket Nos. 50-325, 50-324
License Nos. DPR-71, DPR-62
EA 87-165

Carolina Power & Light Company
ATTN: Mr. E. E. Utley
Senior Executive Vice President
Power Supply and Engineering
and Construction
Post Office Box 1551
Raleigh, North Carolina 27602

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY
(NRC INSPECTION REPORT NOS. 50-325/87-22 AND 50-324/87-22)

This refers to the Nuclear Regulatory Commission (NRC) inspection at the Brunswick Steam Electric Plant (BSEP) on July 6-10, 1987. The inspection included a review of the circumstances surrounding several licensee-identified items not in compliance with 10 CFR 50.49, Environmental Qualification (EQ) of Electric Equipment. The report documenting this inspection was sent to you by letter dated August 27, 1987. As a result of this inspection, significant failures to comply with NRC regulatory requirements were confirmed, and NRC concerns relative to the inspection were discussed in an Enforcement Conference held on September 17, 1987. The letter documenting this conference was sent to you on October 9, 1987.

During the Enforcement Conference on September 17, 1987, Carolina Power & Light Company provided its plan for expanding the Limitorque Motor Operated Valve inspection program. This inspection program resulted in your identification of other EQ deficiencies. These licensee-identified deficiencies included unqualified Allen-Bradley nylon terminal blocks, Collier PVC wire, GE phenolic terminal blocks, additional Whitney-Blake wire, and electrical butt splices. These deficiencies were reported to the NRC and have been corrected.

The violations described in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) involved failures to comply with the requirements of 10 CFR 50.49, and examples of the violations included the failure of speed sensors for the High Pressure Coolant Injection (HPCI) turbine, Vulkene wire, Whitney-Blake wire, control relays for the Standby Gas Treatment (SBGT) skid, Kulka terminal blocks, Cinch terminal blocks, and unidentified teflon-type wire to be environmentally qualified since November 30, 1985. The deficiencies identified in the qualification of these components affected a moderate number of plant systems.

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The NRC believes that Carolina Power and Light clearly should have known about the environmental qualification deficiencies identified above and would have discovered many of them had adequate field verification inspections been performed and if there had been adequate design interface control for skid-mounted components. For a number of the identified deficiencies, the licensee had information available which discussed environmental qualification concerns of similar components. Specifically, two Inspection and Enforcement (IE) Notices as well as an IE Circular notified licensees of the possible problems with environmental qualification of terminal blocks. The need to properly qualify cable/wire was also discussed in an IE Notice, yet the licensee used unqualified wire in making changes to components required to be environmentally qualified. In the case of the Woodward speed sensors, used on the HPCI turbines, the information contained in an October 1985 report from General Electric (NEDC-31001-1) should have alerted the licensee to the need to qualify the sensors. With respect to other unqualified components, you clearly should have known that qualification was incomplete in light of the nature of the items and the systems in which they were used.

To emphasize the importance of environmental qualification of electrical equipment important to safety, I have been authorized, after consultation with the Deputy Executive Director for Regional Operations, and the Director, Office of Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Enclosure 1) in the amount of Fifty Thousand Dollars (\$50,000) for the violations described in the enclosed Notice. In accordance with the "Modified Enforcement Policy Relating to 10 CFR 50.49," contained in Generic Letter 88-07 (Enclosure 2), the violations described in the enclosed Notice have been determined to be a moderate problem, having affected some systems and components, and therefore are considered to be an EQ Category B problem. The base value of a civil penalty for an EQ Category B problem is \$150,000.

The escalation and mitigation factors in the "Modified Enforcement Policy Relating to 10 CFR 50.49" were considered as follows. Mitigation of the base civil penalty is appropriate because of your identification and prompt reporting of some of the EQ deficiencies, your best efforts to be in compliance within the EQ deadline, and initiation of vigorous and extensive corrective actions which should result in your being in full EQ compliance. Based on these considerations, the penalty has only been reduced to \$50,000 because the violations were not isolated and affected more than a limited number of systems and components.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

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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 enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and its enclosures are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,

*Original signed by
J. Nelson Grace*

J. Nelson Grace
Regional Administrator

Enclosures:

1. Notice of Violation and Proposed Imposition of Civil Penalty
2. Generic Letter 88-07

cc w/encls:

- ✓ P. W. Howe, Vice President
Brunswick Nuclear Project
- ✓ R. Dietz, Plant General Manager

Carolina Power and Light Company

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bcc w/encl:
 NRC Resident Inspector
 Document Control Desk
 State of North Carolina
 PDR
 L3ECY
 LCA
 ACRS
 WTaylor, DEDRO
 LMartin, DEDRO
 JNGrace, RII
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 JLuehman, OE
 LChandler, OGC
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 BRayes, OI
 SConnelly, OIA
 EJordan, AEOD
 EA File
 ES File
 DCS

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 AFGibson
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 BRayes
 5/5/88

RII *[Signature]*
 GRJenkins
 5/5/88

RII
 MLErnst
 5/ /88

OE *[Signature]*
 JLuehman
 4/22/88

[Signature]
 RA:RII
 JNGrace
 4/28/88

[Signature]
 OGC For
 LChandler
 4/22/88

OE *[Signature]*
 LJLieberman
 4/23/88

DEDRO *[Signature]*
 WTaylor
 4/29/88