



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

MAR 10 1981

SSINS 6025

James R
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MEMORANDUM FOR: Dudley Thompson, Director, Enforcement and Investigation
Staff, Office of Inspection and Enforcement

FROM: James P. O'Reilly, Director, Region II

SUBJECT: SELECTION OF SEVERITY LEVEL

The violation discussed in the enclosure to this memorandum has been classified by Region II as Severity Level IV. Based on a literal reading of the detailed guidance provided in the supplements to the proposed enforcement policy, a different severity level could be assigned if one failed to properly consider relative significance. Background information and our basis for selecting the severity level are described in the enclosure.

We plan to issue this citation by March 16, 1981. If you have any questions or concerns, please contact C. M. Upright, telephone 242-5623.

We recommend that this example be included in future guidance on the enforcement policy.

James P. O'Reilly
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Enclosure: Selection of Severity Level

cc: Enforcement Coordinators, Region I,
RIII, RIV, RV

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PDR FOIA
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Enclosure

SELECTION OF SEVERITY LEVEL

Disabling All Service Water Systems For Maintenance - Brunswick 2

At 1420 hours on December 9, 1980, with Unit 2 in cold shutdown the Unit 2 conventional and nuclear service water systems were secured to repair the 2A conventional service water pump discharge check valve. Primary coolant temperature at this time was less than 120°F. At 1615 hours, R4R pumps ("A" loop) were secured to reduce coolant heat input from the pumps. Primary coolant temperature at this time was approximately 150°F. Due to unexpected problems, repairs to the valve took longer than anticipated. At 2015 hours, the conventional and nuclear service water systems were returned to service following the check valve replacement. Primary coolant temperature at this time, as read at the vessel bottom head drain, was 147°F. At 2033 hours, shutdown cooling was initiated with the "B" loop of RHR and the coolant temperature reached a local maximum of 256°F.

The reactor head vents were open during this time with zero pressure in the reactor vessel. Primary coolant temperature did not reach the boiling point as there was no exhaust of steam from the open head vent.

During the time from 1420 to 2015 hours, all service water pumps were inoperable. This is contrary to Technical Specification (TS) 3.7.1.2.b., which requires that during cold shutdown there shall be at least three operable service water pumps. TS 3.7.1.2.b further requires in the action statement that with only one service water pump operable restore at least two service water pumps to OPERABLE status within 7 days or declare the core spray system, the LPCI system and the diesel generator inoperable and take the ACTION required by Specifications 3.5.3.1, 3.5.3.2 and 3.8.1.2.

Contrary to this requirement, for a period of approximately 6 hours no service water pumps were operable on Unit 2 and the LPCI system, the core spray system and the diesel generators were not declared inoperable, which exceeds the Limiting Condition for Operation, and failure to verify the operability of at least one LPCI subsystem within four hours, violates the appropriate action statement requirements referenced above.

This violation has been classified as a severity level IV vice a severity level III based on the following mitigating circumstances.

1. The Unit 1 service water system was operable and could have been manually cross connected if necessary, with the Unit 2 service water system. This capability was recognized when the Unit 2 service water system was taken out of service for maintenance. When the licensee operations supervisor realized the cross connection capability could not be utilized to satisfy technical specification requirements for operability NRC was notified. The licensee entered this condition based on a misinterpretation of the

Technical Specification, thinking that operable Unit 1 service water pumps with manual cross connect capability would satisfy the Unit 2 requirements.

2. Additionally, fire water was available for diesel generator cooling.
3. Even without service water the core spray systems were still capable of supplying water to the reactor vessel from the condensate storage tank in an emergency.
4. When it was recognized that these conditions were in excess of the Technical Specifications, the service water system was restored as soon as reasonably possible.