

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Units 1 & 2

Docket Nos. 50-325 and 50-324
License Nos. DPR-71 and DPR-62

During an NRC inspection conducted from October 11 through November 21, 1998, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 5.4.1.a states, in part, that written procedures shall be established, implemented, and maintained covering activities which are recommended in Regulatory Guide 1.33, Appendix A, November 1972, for operation and shutdown of safety-related equipment.

Operating Procedure 1OP-10, "Standby Gas Treatment System Operating Procedure," Revision 40, Section 7.1, "Control Room Manual Shutdown," provides the requirements and actions to shutdown the system and verify correct alignment for a standby condition.

Contrary to the above, on October 30, 1998, the licensee failed to correctly shutdown and verify that the Unit 1 Standby Gas Treatment system was in a standby alignment per section 7.1 of procedure 1OP-10, "Standby Gas Treatment System Operating Procedure." As a result SGT-V8 and SGT-V9, post Loss Of Coolant Accident vent valves, were left in the open position instead of the closed position as required by the procedure.

This is a Severity Level IV violation (Supplement I).

- B. 10 CFR 50 Appendix B, Criterion XVI, "Corrective Action," requires that measures shall be established which assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, as of October 26, 1998, the licensee's measures had not assured prompt identification and correction of conditions adverse to quality as evidenced by the following:

1. Although Reactor Building Closed Cooling Water Heat Exchanger Service Water Inlet Valve, 1-SW-V106, repeatedly failed to fully close in quarterly surveillance tests due to a torque switch trip, the licensee failed to verify that the torque switch was correctly set at the highest torque setting.

Enclosure 1

9901060279 981221
PDR ADOCK 05000324
G PDR

2. The actuator spring pack in valve 1-SW-V106 was replaced because it was believed to be weak and, therefore, a potential cause of the failure of the valve to fully close. The licensee did not test or otherwise evaluate the removed spring pack to determine if it had contributed to the valve failure.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, for Violation B, Carolina Power and Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the Brunswick facility within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the Violation or Severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

The NRC has concluded that information regarding the reason for Violation A, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance will be achieved, is already adequately addressed on the docket in the enclosed inspection report. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the Brunswick facility within 30 days of the date of the letter transmitting this Notice.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy or your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in

NOV

3

detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated at Atlanta, Georgia
This 21st day of 1998