Carolina Power & Light Company Brunswick Steam Electric Plant P. O. Box 10429 Southport, NC 28461-0429 November 25,1987 FILE: B09-13510C 10CFR2.201 SERIAL: BSEP/87-1318 U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555 BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2 DOCKET NOS. 50-325 AND 50-324 LICENSE NOS. DPR-71 AND DPR-62 RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS Gentlemen: The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/87-31 and 50-324/87-35 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, Dig C. R. Dietz, General Manager Brunswick Steam Electric Plant RMP/ah Enclosure

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

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## VIOLATION

Technical Specification 6.8.1.c requires written procedures be established for surveillance activities of safety-related equipment. Procedure PT-12.2B, No. 2 Diesel Generator Monthly Load Test, revision 29, covers surveillance testing of the safety-related No. 2 diesel generator.

Contrary to the above, written surveillance procedures were inadequately established in that on September 29, 1987, no restoration lineup was required in PT-12.2B to restore temperature control valves MUD-TCV-2155 and LO-TCV-2054 to the position required by the diesel generator operating procedure.

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

## RESPONSE

I. Admission or Denial of the Alleged Violation

Carolina Power & Light Company acknowledges the subject violation as described.

II. Reason for the Violation

The subject temperature control valves (TCVs), are designed to automatically control temperature within desired operating parameters; however, the valves may be manually adjusted, if necessary, by the operator for additional temperature control. Use of this additional means of control (manual adjustment) is considered to be an abnormal condition. Revision 29 to PT-12.2B provided a procedural caution that adjustment of any automatic temperature control valve is an abnormal operation and that the Shift Foreman should be notified if any adjustments are made. It was anticipated, although not specified in the PT procedure, that the Shift Foreman would appropriately generate a Work Request/Job Order (WR/JO) and would make an assessment of whether the adjustments made affected the operability of the diesel. Thus, it was felt that adequate guidance was provided within the procedure to identify and correct problems associated with the TCVs should they be placed in an abnormal position.

The valves were erroneously deleted from the PT restoration lineup as manual operation of TCVs was considered an abnormal condition and not a routine procedure step performed during the periodic test.

III. Corrective Steps Which Have Been Taken And Results Achieved

The PT procedure was revised on October 12, 1987, revision 30, to include the TCVs in the posttest restoration lineup and provide a cautionary statement which indicates that a WR/JO be initiated should manual adjustment of the TCVs be necessary.

IV. Corrective Steps Which Will be Taken and When Full Compliance Will be Achieved

The PT procedure will be further revised to include additional information and guidance regarding the identification of a TCV malfunction. In addition, the test procedure will be revised to more clearly describe administrative action to be taken should the TCVs require manual operation. The subject procedure revisions will be completed by January 29, 1988.