



Carolina Power & Light Company

October 31, 1979

FILE: NG-3513 (B)  
2630 (B)

SERIAL: GD-79-2762

Mr. James P. O'Reilly, Director  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 & 2  
LICENSE NOS. DPR-62 AND DPR-71  
DOCKET NOS. 50-324 AND 50-325  
SUPPLEMENTAL RESPONSE TO IE INSPECTION REPORT 79-02

Dear Mr. O'Reilly:

Infraction C, (324-325/79-02-09) of the subject reported stated:

C. 10CFR50, Appendix B, Criterion XII, states in part:  
"Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods . . ."The accepted Quality Assurance Program (Corporate QA Manual, Part 2), Section 6.4, states in part: "A calibration program shall be developed. . ."and "shall include: . . .d. The calibration frequency. . ."

Contrary to the above, as of January 16, 1979, measures had not been established to assure that instruments used in activities affecting quality were properly calibrated at specified intervals in that:

- there was no program in effect for periodic calibration of Instrument and Control group safety-related instruments which are utilized in verification of Technical Specification values listed as Limiting Conditions for Operations; and, 1388 051
- one procedure which had been used during the preoperational calibration of instruments in this category could not be used as currently written because it (MP3-3F) could not be physically hooked up as it was during the original bench test and it incorrectly specified that out-of-specification reading obtained prior to adjustment be averaged with correct reading obtained after adjustment to provide the "as left" setpoint.

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Carolina Power & Light Company's response to this item stated:

Since these instruments do not actually perform a safety function, it has been a normal practice to calibrate them during installation or initial operation and recalibration following any maintenance on the instruments. As a result, these instruments were not on a regular schedule for recalibration.

The list of instruments affected has now been identified with the exception of Environmental and Fire Protection instruments which are still being evaluated. These include instruments which are utilized in verification of Technical Specifications values but have no specific surveillance requirements identified. Due to the number of instruments involved and the instruction that must be written, implementation will be as follows:

The listing of Environmental Technical Specification instruments and those required by the Fire Protection Program shall be determined by October 31, 1979, and included in the calibration program as indicated below.

The instructions are being written and will be approved and implemented as each instruction is completed. The entire calibration program, including frequency of calibration requirements will be implemented by December 31, 1979.

Due to changes in the Fire Protection System and the increase work load created by TMI, seismic analyses, and anchor bolt inspections, CP&L wishes to restate the response to this item as follows;

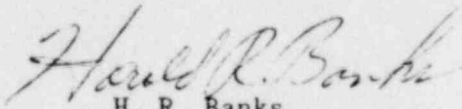
The listing of Environmental Technical Specification instruments shall be determined by October 31, 1979. Those instruments required by the Fire Protection Program shall be determined by December 31, 1979. These instruments shall be included in the calibration program.

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October 31, 1979

The instructions are being written and will be approved and implemented as each instruction is completed. After March 31, 1980, all calibration instructions used will include the Calibration Program Requirements.

Yours very truly,



H. R. Banks

Manager

Nuclear Generation

CER/CSB/eaj\*

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