CP&L

Carolina Power & Light Company

October 16, 1979

FILE: NG-3513 (B) SERIAL: GD-79-2575

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-71 AND DPR-62
DOCKET NOS. 50-325 AND 50-324
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

Brunswick Steam Electric Plant has reviewed IE Inspection Report 50-324/79-29 and 50-325/79-30 and finds that it does not contain any information of a proprietary nature.

The report identified one item which appeared to be in noncompliance with NRC requirements. This item and Carolina Power & Light Company's response are addressed in the following text:

INFRACTION

As required by 10CFR50 Appendix B, Criteria V, activities affecting quality shall be prescribed by documented instructions and procedures of a type appropriate to the circumstance. ANSI N18.7-1972, as committed to by CP&L Quality Assurance Program, requires limitations on the parameters being controlled and appropriate corrective measures to return the parameters to the normal control band be specified.

Contrary to the above, on July 18, 1979, Unit No. 1 recirculation loop "B" was returned to service per operating procedure OP-2, Section F. This section requires that the recirculation pump discharge valve be held open initially for a maximum of 2 seconds followed by a 10 second wait. In the performance of this procedure a power transient occurred that resulted in upscale APRM's tripping the reactor. The limitations in the procedure on opening the discharge valve were inadequate to limit the power transient and thus preclude challenging of the safety systems which resulted in a reactor trip.

CAROLINA POWER & LIGHT COMPANY'S RESPONSE

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OP-2 on the reactor recirculation system has been revised as follows:

1. Prior to starting a reactor recirculation pump with the reactor critical, insert control rods as necessary to

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obtain ≥ 10% margin between APRM reading and the APRM Rod Block Setpoints.

2. Reduce the running reactor recirculation pump speed to ≥ 50% prior to starting the idle recirculation pump.

3. When referring to the pump discharge valve, the wording has been changed from "open" to "jog".

General Electric's recommended recirculation pump discharge valve jogging sequency was compared with the "2 second jog and 10 second wait" and an evaluation was made. Our procedure as revised is more conservative than the GE procedure; therefore, the "2 second jog and 10 second wait" was not changed.

A scram review meeting was conducted with those involved with the scram and plant management. The incident has been reviewed by all Operations personnel.

Yours very truly,

Harold R. Banks

H. R. Banks
Manager
Nuclear Generation

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