



Carolina Power & Light Company

USNRC REGION II
ATLANTA, GEORGIA

June 12, 1981

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File: NG-3513(B)

Serial No.: NO-81-1020

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

BRUNSWICK STEAM ELECTRIC PLANT UNIT NOS. 1 AND 2
LICENSE NOS. DPR-71 AND DPR-62
DOCKET NOS. 50-325 AND 50-324
RESPONSE TO INFRACTIONS OF NRC REQUIREMENT

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 50-325/81-04 and 50-324/81-04 and finds that it does not contain any information of a proprietary nature.

The report identified one item that appears to be in non-compliance with NRC requirements. This item and Carolina Power & Light Company's response is addressed in the following text:

Violation: (Severity Level IV)

Technical Specification 6.9.1.8 requires that the performance of components that require corrective measures to prevent operation in a manner less conservative than assumed in the accident analysis or technical specification bases shall be reported within 24 hours by telephone to the Regional Office with a written followup report within two weeks.

Contrary to the above, the NRC was not notified by telephone within 24 hours and a written followup report was not submitted within two weeks when inoperable hydraulic snubbers from Unit No. 2 were identified during functional testing on January 20, 1981 while the plant was at 88% full power.

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Carolina Power & Light Company's Response:

Carolina Power & Light Company acknowledges that this is a violation of NRC requirements. This event occurred as a result of a revision to the functional periodic test for snubbers which allowed the functional testing to be performed during operation. As identified in the inspection report, the functional test for snubbers was divided into accessible and inaccessible portions, and the accessible portion of the functional test was being performed while the plant was operating. Due to the fact that only one snubber at a time was removed for testing, the time required to complete the testing was increased.

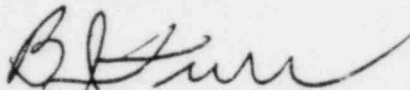
Prior to the revision stated above, all snubber testing was performed with the units shut down. Reports of snubber failures identified during functional testing were made at the completion of testing following review by the Regulatory Compliance group. During shut down, testing could be performed more expeditiously; hence, the review of snubber failures was usually completed within two weeks and appropriate reports issued. Following the above procedure revision, the duration of the accessible functional test extended, in this case, to greater than two months. The Regulatory Compliance group was not informed of snubber failures until early March, at which time appropriate reports were made.

As discussed with NRC Region II personnel, it has been and will continue to be CP&L practice to report snubber failures discovered during testing in a timely manner following completion of the testing. Should an unusual rate or mode of failure be identified during testing, an immediate report will be made and a followup report submitted following completion of the testing. Should a failure be discovered during operation, an immediate report will be made in accordance with the unit technical specifications.

To prevent this event from occurring in the future, the functional periodic test is being revised to require that it be performed while the unit is shut down. This will reduce the excessive time required to complete the test. Also, the revision will require that the Regulatory Compliance group be

notified whenever a failure is identified so that it can initiate the required reporting in a timely manner. This revision will be completed by August 31, 1981, prior to the next scheduled performance of this test.

Yours very truly,



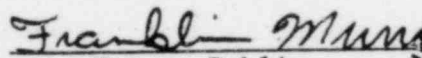
B. J. Furr
Vice President
Nuclear Operations

DCS/jc (1309)

B. J. Furr, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

My commission expires:

October 4, 1981


Notary Public

