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Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461

June 25, 1981

FILE: B09-13514
SERIAL: BSEP/81-1272

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street N.W.
Atlanta, GA 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:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 50-324/81-11 and 50-325/81-11 and finds that it does not contain any information of a proprietary nature.

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

Violation (Severity Level V)

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be described by documented instructions, procedures or drawings, of a type appropriate to the circumstances. The approved Quality Assurance Program, Section 13.3.1, states maintenance procedures and instructions will include quantitative and qualitative criteria for determining that important steps or functions have been satisfactorily accomplished. Section 13.4.2.2 states maintenance activities shall be coordinated between personnel responsible for the maintenance and personnel responsible for QA/QC activities to assure adequate coverage of maintenance activities.

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Violation (Severity Level V) (cont'd)

Contrary to the above, Modification Procedures 77-269D and 77-269F for the reactor protection system level instruments were inadequate, in that they were not clear, concise and coordinated with other crafts which resulted in an accidental initiation of the ECCS and the associated engineering safeguard systems when performing a hydrostatic test on a portion of the system.

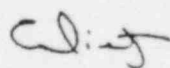
Carolina Power & Light Company's Response

Carolina Power & Light Company admits that this is a violation of NRC requirements. During the development of the hydrostatic testing portion of these plant modifications, consideration was not given to the possibility of two instruments' isolation valves leaking and thus causing the two isolated instruments to actuate. Historically at the Brunswick plant, a dual failure is not considered when setting boundaries for hydrostatic testing. In addition, the procedure did not provide for adequate coordination between the various crafts performing different portions of the test.

This problem was corrected by revising the procedure to require either two valve protection for each instrument or declaring the instrument inoperable and opening its equalizing valve. The revision also improved inter-craft communications and provided additional hold points for better control. The hydrostatic test was then completed with no further problems.

To prevent events of this nature from occurring in the future, a standard procedure will be developed to control hydrostatic testing. This procedure will ensure that proper holdpoints and safeguards are in effect for all future hydrostatic tests and will be written and approved for use by October 31, 1981.

Very truly yours,



C. R. Dietz, General Manager
Brunswick Steam Electric Plant

RMP/gvc

cc: Mr. R. A. Hartfield
Mr. V. Stello, Jr.