

Carolina Power & Light Company

September 11, 1975

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Mr. Benard C. Rusche, Director  
Office of Nuclear Regulatory Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Rusche:

BRUNSWICK STEAM ELECTRIC PLANT  
DOCKETS 50-324 AND 50-325  
QUALITY ASSURANCE PROGRAM

After recent discussions with your staff concerning the Brunswick Steam Electric Plant's commitment to the quality assurance guidance contained in WASH 1283, 1284, and 1309, we submit the following clarification to our commitment.

The applicability of the guidance contained in ANSI Standards to work that falls under the Brunswick Operation & Maintenance QA program shall be determined, reviewed, and approved by supervisory and plant management personnel.

Yours very truly,

J. A. Jones

Executive Vice President  
Engineering, Construction & Operation

JAJ/rt

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The appropriate paragraphs of our February 27, 1975 letter should be replaced by the paragraphs below:

Page 2, Paragraph 3B  
ANSI N45.2.8

"Within the context of the established Operation and Maintenance QA Program, the applicable guidance contained in ANSI N45.2.8 (Draft 3, Rev. 3-- April, 1974) will be utilized in relation to mechanical maintenance or modification with the following exception-- ANSI N45.2.8, Section 6 states in part, 'Procedures shall be established for processing inspection and test data and their analysis and evaluation.' At ESEP data processing procedures per se have not been developed; instead, test data is recorded, processed, and analyzed in accordance with procedures and instructions in appropriate functional areas, e.g., maintenance, startup, etc."

Page 2, Paragraph 3C  
ANSI N45.2.13

"The applicable guidance contained in ANSI N45.2.13 (Draft 2, Rev. 4 April, 1974) will be utilized in relation to procurement of items and services performed under the established requirements of the ESEP Operation and Maintenance QA Program."

Page 4, Paragraph 2A  
ANSI N45.2.5

"The qualification of ESEP inspection, examination, and testing personnel will be in accordance with ANSI N45.2.6 - 1973 with the following specific exceptions:

- "a. N45.2.6 Sections 2.2.4, 3.1, and 3.2.2 - Only personnel performing NDE (PT, MT, UT, and RT) will be grouped in levels of capability and certified as such. However, inspection personnel are certified for implementing inspections, review and evaluation of inspection data, and reporting of inspection and test results.
- "b. N45.2.6 Section 3.2.1 - Potential employees are required to receive a complete examination to assure satisfactory physical condition, but annual physical examinations are not required.

Responses to Request for Additional Information  
NRC Letter G. Lear to E. G. Bauer, Jr., August 8, 1977

Question 1.

Appendix 17.2.B The Engineering & Research Department has not provided a commitment to comply with Regulatory Guide 1.33, 11/3/72, "Quality Assurance Program Requirements," Regulatory Guide 1.39, 3/16/73, "Housekeeping Requirements for Water-Cooled Nuclear Power Plants" and Regulatory Guide 1.88, 10/1976, "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records" in the Appendix 17.2.B of the OQA program. Since these Regulatory Guides can apply during the modification phase, it is requested that a commitment to comply with these Regulatory Guides be provided in Appendix 17.2.B for activities associated with the Engineering & Research Department.

Response:

Revised 17.2 Appendix B to provide commitments as requested in Question 1.

Question 2.

A question on Section 17.2, previously submitted to Philadelphia Electric Company has not been answered. The Engineering & Research Department will be involved in vendor QA evaluations and surveillance and major modifications work as requested by the Electric Production Department. Since the Electric Production Department is principally responsible for Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, it is expected any delegation of QA authority within Philadelphia Electric Company will comply with the controls described in Section 17.2 of the FSAR. Accordingly, describe the extent that the Engineering & Research Department will comply with the controls of Section 17.2 when performing modifications to Peach Bottom Atomic Power Station, Unit Nos. 2 and 3.

Response:

The previous question on Section 17.2 was answered in the submittal of May 20, 1977 where the application of the OQA Program to Engineering & Research Department activities was shown by referencing numerous sections of FSAR Section 17.2. By way of additional clarification, the Engineering & Research Department complies with the corporate administrative controls described in FSAR Section 17.2 which apply to personnel working at the plant site. Design, procurement and installation of major modifications for Peach Bottom Atomic Power Station, Unit Nos. 2 and 3 is performed by the Engineering & Research Department under the controls of the Peach Bottom Atomic Power Station Quality Assurance Plan Volume I. Volume I will be revised to contain quality assurance provisions similar to those described in FSAR Section 17.2 as applicable to Engineering & Research Department activities, and to provide for implementation of the Engineering & Research commitments to the Regulatory Guides and ANSI Standards as contained in FSAR Appendix 17.2B. Volume I will be subject to review and acceptance by the Electric Production Department.

ANSI M45.2.6 (continued)

"The near vision acuity of inspection, explanation, and testing personnel will be checked annually by using the standard Jaegers type chart or equivalent test type."

Page 7, Paragraph 4H  
ANSI M45.2.1

"Chemical compounds that contribute to intergranular cracking or stress-corrosion cracking at BSEP shall not be used in cleaning of austenitic stainless steel and nickel-base alloys."

Page 8, Paragraph 4F  
ANSI M45.2.1

"When applicable at BSEP, ASTM A 262-63 will be used to detect possible intergranular precipitation of chromium carbides in corrosion-resistant austenitic steels."

Page 9, Paragraph 6A  
ANSI M45.2.2

"Packaging, shipping, receiving, storage, and handling of BSEP items are in accordance with applicable requirements of ANSI M45.2.2 - 1972 with the following specific exception:

"Subdivision 2.7 of ANSI M45.2.2 - 1972 states, in part, that 'requirements for activities covered by this standard (packaging, shipping, receiving, storage, and handling) are divided into four levels . . . .'

"At BSEP a classification system similar to ANSI M45.2.2 - 1972 has been developed and is fully implemented for the storage activity.

"The other activities--packaging, shipping, receiving, and handling--are adequately covered by documented procedures or procedures will be developed as required; however, such procedures are neither tied to the classification system developed at BSEP for storage, nor are they tied to the classification system developed in M45.2.2."

Page 10, Paragraph 6B  
ANSI N45.2.2

"If re-rating of hoisting equipment is necessary for special lifts at BSEP, the test weight used in temporarily re-rating hoisting equipment for special lifts in accordance with the provisions of ANSI N45.2.2, Subdivision 7.3.4 will be at least equal to 110% of the lift weight. A dynamic load test over the full range of the lift using a weight or test equal to the lift weight will be performed."

Page 11, Paragraph 7  
ANSI N45.2.11

"Those areas of the Operation and Maintenance QA Program for BSEP applicable to design or modification of the plant are in accordance with the appropriate requirements of ANSI N45.2.11 - 1974."

Page 15, Paragraph 12  
ANSI N45.2.3

"The applicable requirements of N45.2.3 - 1973 are followed at BSEP within the context of the established Operation and Maintenance QA Program with the following specific exception--the zone designations of Section 2.1 of N45.2.3 and the requirements associated with each zone are considered impractical for implementation, as stated, at BSEP during the operations phase. Instead, procedures or instructions for housekeeping activities, which include the applicable requirements outlined in Section 2.1 of N45.2.3 and which take into account radiation control considerations, security considerations and cleanliness requirements are developed on a case basis for work to be performed."

Page 15, Paragraph 13  
ANSI N45.2.5

"The original specification requirements, applicable guidance contained in ANSI N45.2.5 - 1974, or acceptable alternatives based on an engineering evaluation will be utilized in the event future structural work is to be performed which falls under the established requirements of the BSEP Operation and Maintenance QA Program."

*100 to 1000  
level of record facility*

In response to your request for additional information on Paragraph 10, the following descriptive information on the QA records permanent storage vault is furnished:

1. Currently there are two wall penetrations that house window-type air conditioners. The size of these penetrations is 20" x 19". These air conditioning units will be removed and these penetrations blocked up at the end of construction. There are also two wall pipe penetrations. One is a six-inch diameter penetration through which the Halon discharge pipe and electrical conduit are routed. The other is an approximately two-inch penetration through which the permanently installed air conditioning cooling water lines are routed. Finally, there is a second door in the vault which will be blocked up at the end of construction.
2. The Halon system is a two-zone system. There are a total of four detectors--two for each zone. If a detector in either zone trips due to smoke, an audible alarm is activated. Personnel have been instructed and written procedures prepared for immediate evacuation of the vault at this time. If the second detector in the zone trips, the Halon system will discharge. The vault doors automatically close at this time and all air conditioner units will de-energize.
3. The smoke detectors are ionization type. They are set to be tripped from the smoke level of a single cigarette.
4. The Halon system includes main and reserve tanks, both of which will supply the design concentration of six percent Halon throughout the vault.
5. A periodic inspection covering such items as Halon tank pressure, battery charge, and general condition of equipment will be conducted and documented on a weekly basis. If deficiencies (e.g., tank leakage) are uncovered as a result of the inspection program, then appropriate corrective actions will be taken (e.g., design changes, revision of the inspection program, etc.)
6. A portable fire extinguisher will be permanently located in the area adjacent to the main entrance to the vault. This area is currently unprotected.

ANSI N45.2.9 (continued)

7. After construction of Brunswick Unit 1 is completed, the vault will be a minimum use area. The amount of combustibles within the vault will be restricted. The temporary buildings currently surrounding the vault will be removed from the area so that there will be essentially no combustibles external to the vault building structure.