

DESIGNATED ORIGINAL

Certified By E. J. Schaefer

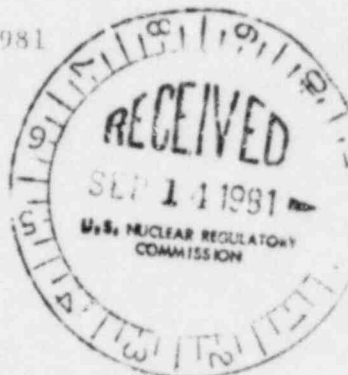
Carolina Power & Light Company

Brunswick Steam Electric Plant  
P. O. Box 10429  
Southport, NC 28461-0429

August 26, 1981

FILE: B09-13514  
SERIAL: BSEP/81-1590

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 50-324/81-14 and 50-325/81-14 and finds that it does not contain any information of a proprietary nature.

The report identified two item(s) that appear to be in noncompliance with NRC requirements. These items and Carolina Power & Light Company's response to each are addressed in the following text:

Violation A: (Severity Level V)

Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained. Operating procedure OI-5-A, Status of Annunciators in Alarm, requires annunciators in alarm to be recorded in a log.

Contrary to the above, on July 6, 1981, alarming annunciators on control room alarm panels 2-A-1 through 2-A-7, were not listed in the log. Unit No. 1 and Unit No. 2 Control Operators were not maintaining the log as required.

Carolina Power & Light Company's Response

Carolina Power & Light Company acknowledges that this was a violation of technical specifications. This violation was the result of Operations personnel not adhering to an approved plant procedure due to its extreme administrative requirements which detracted the operators from their normal functions and also due to an interpretation problem in administering the procedure.

A coordinated effort has been under way during the past year to darken (place in a nonalarming condition) annunciators not required to be alarming to reduce the

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excessive number of lighted alarms on each unit. The reasons for annunciation falls into several categories: 1) actual alarms due to component or system problems, 2) alarms resulting from maintenance or testing being performed on a component or system, 3) alarms which indicate the status of a component or system but which do not indicate problems, 4) problems with the annunciator circuitry or logic. To help correct problems created by excessive annunciators being lighted, two programs were initiated. The major effort is to have Engineering, with Operations assistance, evaluate all lighted annunciators and modify them if required to assure that a lighted annunciator is required to be lighted. The second portion of the program was the development of a procedure to maintain an up-to-date status of all lighted annunciators such that operators had an available reference to identify why an alarm was lighted. Failure to follow this procedure led to this violation.

To correct this problem, the Manager-Operations meet with the Shift Operating Supervisors and the Shift Foremen to discuss the requirement that approved procedures must be followed and that they cannot be arbitrarily ignored. Also discussed was the need to initiate procedure revisions when problems are encountered with compliance or technical merit. Implementation of the current procedure has been resumed by all shifts while it is being revised. The revised procedure will be more clearly written and will be administratively functional. This procedure will be revised and implemented by September 30, 1981.

#### Violation B (Severity Level V)

Technical Specification 3.0.4 requires that entry into an Operational Condition or other specified applicability state not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the Action Statements. Technical Specification 3.5.3.2, requires that two independent Low Pressure Coolant Injection (LPCI) subsystems of the residual heat removal system shall be operable with each subsystem comprised of:

1. Two pumps
2. An operable flow path capable of taking suction from the suppression pool and transferring the water in the reactor pressure vessel.

Contrary to the above, on June 29, 1981, as a result of an operator error, the reactor mode switch was taken out of the refueling mode, placed in startup, and control rod withdrawal commenced with the A-loop RHR torus suction valve (F020A) shut.

#### Carolina Power & Light Company's Response

Carolina Power & Light Company acknowledges that this was a violation of technical specifications. This event was initially reported in LER 2-81-59.

At approximately 0430 while establishing a standby readiness lineup for A loop of RHR in preparation for a reactor startup, the breaker for the torus suction valve, F020A tripped. Two Auxiliary Operators were sent to manually open the valve. The Auxiliary Operators were not able to break the valve disk off of its seat, so another Auxiliary Operator was sent to assist with a manual valve operator. At 0528, prior to receiving word on the status of the F020A valve, a normal reactor startup was commenced. Shortly after the commencement of the

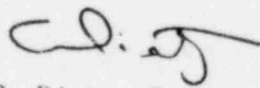
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startup, the Shift Operating Supervisor questioned the position of the F020A valve during a review of the control panel. The startup was secured with seven rods withdrawn and the Auxiliary Operators' assigned to open the valve were contacted to determine the actual valve position. At 0534, word was received in the Control Room that the F020A valve was still shut and still could not be broken off its seat. The seven withdrawn control rods were immediately inserted and the mode switch was taken to the refuel position.

An investigation of this event has determined that the main cause was personnel error with slow communications being a minor cause. The Control Operator assumed that sufficient time had elapsed to open the F020A valve and thus initiated a reactor startup. He also initialed the step on the startup procedure requiring the valve to be open as complete. To correct these problems the following actions have been or will be taken:

1. A meeting was held with senior plant management and those personnel involved to discuss the series of events that led to this violation of technical specifications and the seriousness of that violation.
2. Appropriate disciplinary action was taken with the individuals involved in this event. The Shift Foreman and the Control Operator involved with this event were removed from duties requiring a license until the investigation was completed. Following the investigation and the meeting described in 1. above, the personnel were returned to normal duty.
3. Each Shift Operating Supervisor reviewed this event with their respective shifts with emphasis on ensuring that items are verified complete prior to signing them off, and that all blocks are completed or an explanation documented and an approval signature obtained prior to initiation of any event requiring the documentation.
4. The Shift Foreman discussed with all Auxiliary Operators and Control Operators the need to maintain effective communications and to report problems to the Control Room in an expedited manner.
5. GP-1 (plant startup procedure) will be reviewed and revised as required to better define startup prerequisites. This item will be completed by September 30, 1981.

Very truly yours,



C. R. Dietz, General Manager  
Brunswick Steam Electric

RMP/mcg

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