

USNRC REGION
ATLANTA, GEORGIA

CP&L

Carolina Power & Light Company

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

September 14, 1982

FILE: B09-13510E
SERIAL: BSEP/82-1988

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 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO IE REPORT 50-324(325)/82-21

Dear Mr. O'Reilly:

As addressed in IE Inspection Report 50-324/82-21 and 50-325/82-21, Carolina Power & Light Company committed to respond to the two concerns identified as Inspection Followup Item 82-21-02. CP&L has not yet completed its review of the first concern due to the magnitude of work, and reviews necessitated by commitments and other items identified to the Commission since mid-July 1982. Addressed below is the current status of CP&L's efforts to address the two identified concerns.

Concern 1

Type C testing did not identify and result in the correction of miscellaneous leakages which were identified by the Type A test.

CP&L Response:

A number of miscellaneous leakages were identified while performing the Type A testing, the most significant being (1) the missing gagging bolt for relief valve E11-F055A and (2) the flow orifice for CAC-FT-2686. An investigation was performed to determine if Type C testing would, or should, have identified this leakage and what actions were or should be taken.

A review of the relief valve missing gagging bolt leakage determined that relief valves which could communicate with the primary containment were not being checked by Type C testing and, therefore their leakage may not have been detected during Type C testing. To correct this omission, relief valves which could communicate with the primary containment have been added to the Type C testing program. Also, to prevent, or allow earlier detection of, missing

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gagging bolts, the gagging caps to these relief valves have been added to the 31-day primary containment penetration integrity check. These combined actions should prevent future events of this nature.

A review of the excessive leakage through the flow orifice for CAC-FT-2686 revealed that this orifice is and had been tested per the Type C testing program. This orifice is tested in conjunction with CAC-V48 in a direction equivalent to the Type A test. The Type C test conducted on that penetration prior to the Type A test resulted in a leakage of approximately 0.26 SCFH, which was negligible when compared to its identified leakage during the Type A test. The cause for the sudden increase in leakage could not be determined.

The flow orifice in this event is located between the containment and the first isolation valve. To provide better protection against future excessive leakage of this flow orifice, a plant modification has been completed on both units which relocates it between the first and second isolation valves.

A review of other miscellaneous leakages is in progress to determine whether other actions are required to ensure that Type C testing is adequate to identify containment leakages. This review has determined that some valve packing is not tested during current LLRT practices. An assessment of this problem is in progress and will be reviewed with our resident inspector prior to startup of the units.

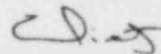
Concern 2

The licensee's procedures did not maintain control of equipment to prevent leakage paths, specifically the RHR relief valve gagging bolt.

CP&L Response:

This concern has been addressed in CP&L's response to the first concern, and, therefore, CP&L considers that item closed.

Very truly yours,



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

RMP/tt

Enclosure

cc: Mr. V. Stello, Jr.