



Carolina Power & Light Company

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

April 21, 1994

SERIAL:BSEP 94-0152
10CFR2.201

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

On March 24, 1994 the Nuclear Regulatory Commission (NRC) issued a Notice of Violation for the Brunswick Steam Electric Plant, Units 1 and 2. The basis for the violation is provided in NRC Inspection Report 50-325/94-04 and 50-324/94-04. Carolina Power & Light Company finds the inspection does not contain information of a proprietary nature. Enclosure 1 provides Carolina Power & Light Company's response to the Notice of Violation in accordance with the provisions of 10CFR2.201.

Please refer any questions regarding this submittal to Mr. R. E. Lopriore at (910) 457-2404.

Very truly yours,

J. Cowan, Director-Site Operations
Brunswick Nuclear Plant

JFM/jfm

Enclosures

1. Reply to Notice of Violation
2. List of Commitments

cc: Mr. S. D. Ebner, Regional Administrator, Region II
Mr. P. D. Milano, NRR Project Manager - Brunswick Units 1 and 2
Mr. R. L. Prevatte, Brunswick NRC Senior Resident Inspector

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ENCLOSURE

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 and 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NOS. DPR-71 & DPR-62
REPLY TO NOTICE OF VIOLATION

VIOLATION A:

Technical Specification 4.6.3.1 requires that each primary containment isolation valve specified in Regulatory Compliance Instruction RCI-02.6, Technical Specification Cross Reference, be demonstrated operable prior to initially placing it in service.

Technical Specification 4.6.3.2 requires that each primary containment isolation valve be demonstrated operable at least every 18 months by verifying that on a containment isolation test signal each valve actuates to its isolation position.

Contrary to the above, between April 23, 1992 and January 31, 1994, the licensee failed to demonstrate that primary containment isolation valve 2-CAC-V216 would attain its isolation position upon the receipt of a containment isolation signal.

This is a Severity Level IV violation (Supplement 1).

RESPONSE TO VIOLATION:

Admission or Denial of Violation

Carolina Power & Light admits this violation.

Reason for Violation

The violation is due to an insufficient review of required Technical Specification testing for Group 6 Primary Containment Isolation System (PCIS) valves. The Containment Atmospheric Control (CAC) valve, 2-CAC-V216, was added during the Hardened Wetwell Vent Plant Modification. The 2-CAC-V216 is the Hardened Wetwell Vent Outboard Isolation Valve. It is a PCIS valve and is designed to close automatically on a Loss of Coolant Accident (LOCA) signal provided by the Group 6 isolation logic. The modification was completed on Unit 2 in March, 1993.

When the acceptance test was scheduled it was noted that the isolation signal for the 2-CAC-V216 would also cause the other Group 6 isolation valves to close. This would secure the ventilation system for the drywell and the torus and interfere with ongoing maintenance activities. The decision was made to revise the acceptance test to test the 2-CAC-V216 only. The revised acceptance test was inadequate in that it did not test the operation of the valve using a LOCA test signal.

Any document which requires revision prior to operability of a modification must be identified to support any surveillance and/or startup requirements. The required 18 month operability for the CAC PCIS valves is demonstrated by the performance of Maintenance Surveillance Test 2-MST-CAC-41R, CAC PCIS Groups 2 and 6 Isolation Logic System Functional Test. The MST was not identified as a document requiring revision prior to modification operability due to the belief that the revised acceptance test performed for the 2-CAC-V216 was adequate to verify operability.

Corrective Actions Which Have Been Taken and Results Achieved

1. A temporary revision was made to Periodic Test 4.1.1, Reactor Building Ventilation Exhaust Monitoring System Functional Test, to ensure the CAC-V216 would isolate on a Group 6 isolation signal and to satisfy the logic system functional test requirement normally provided by MST-CAC-41R. The test was performed satisfactorily on Unit 1 and 2.
2. 1/2MST-CAC-41R was revised to include the CAC-V216.

Corrective Steps Which Will Be Taken to Avoid Further Violations

1. Design Engineers will be trained on functional and startup testing requirements while developing plant modifications.
2. Positive controls will be implemented to ensure procedural impact reviews are performed prior to plant modification operability.

All corrective actions will be completed by July 15, 1994.

Date When Full Compliance Will Be Achieved

Carolina Power & Light believes it is in full compliance with Technical Specifications 4.6.3.1 and 4.6.3.2.

Enclosure
List of Regulatory Commitments

The following table identifies those actions committed to by Carolina Power & Light Company in this document. Any other actions discussed in the submittal represent intended or planned actions by Carolina Power & Light Company. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Brunswick Nuclear Plant of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage
1. Design Engineers will be trained on functional and startup testing requirements while developing plant modifications.	7/15/94
2. Positive controls will be implemented to ensure procedural impact reviews are performed prior to plant modifications operability.	7/15/94