



Carolina Power & Light Company

MAR 12 1993

SERIAL: NLS-93-020

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62  
INSERVICE INSPECTION/TESTING PROGRAM

Gentlemen:

The purpose of this letter is to inform the NRC of a discrepancy identified in the Inservice Inspection and Testing Program at Carolina Power & Light Company's Brunswick Steam Electric Plant, Unit Nos. 1 and 2. This letter also identifies the corrective actions being taken to resolve this discrepancy.

The current In-Service Inspection (ISI) and Testing (IST) program for the Brunswick Plant is being conducted in accordance with the requirements of the ASME Code, Section XI, 1980 Edition, Winter 1981 Addendum, as described in Revision 1 of the Brunswick Plant Inservice Inspection Program. A copy of the program was submitted to the NRC by letter dated August 19, 1987 (Serial: NLS-87-159).

The Brunswick Plant is performing an independent assessment of the Brunswick ISI/IST Program. During this assessment, it was noted that, due to an inappropriate boundary classification, the Containment Penetration Cooling System had been incorrectly classified as a non-class system instead of the correct designation as a Class 2 system. The inappropriate boundary classification existed during the first 10-year interval, which concluded in 1986. As a result of this inappropriate classification, CP&L did not perform the ASME Code Section XI testing activities for Class 2 components and piping in the Containment Penetration Cooling System during the first ten-year interval. The specific testing not conducted was a hydrostatic test of the Containment Penetration Cooling System in accordance with Section XI of the ASME Code, Paragraphs IWA-5000 and IWC-5000.

Although the Containment Penetration Cooling System had been identified as an ASME non-classified system, alternate test activities have been performed during both ten-year intervals that provide adequate assurance of the quality and safety of the affected lines, including:

1. A local leak rate test (LLRT) has been performed during each refueling outage using air at a pressure of 93 psig as the test medium. The acceptance criteria was established at 8.0 scfh, a small fraction of the total allowable leakage. Review of the latest LLRT data for each unit has indicated leakage rates of 0.155 scfh (Unit 1, November 13, 1992) and 2.163 scfh (Unit 2, December 12, 1992). Carolina Power & Light Company believes that the 10 CFR 50, Appendix J leakage results are an excellent indicator of system integrity. This LLRT is considered conservative because the test includes the combined leakages from the Reactor Building Closed Cooling Water (RBCCW) System and the Penetration Cooling System, since these systems are tested together.

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401 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

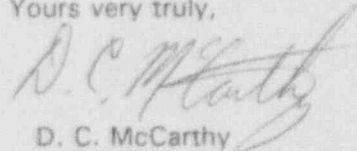
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2. A visual walkdown inspection to identify leakage is performed every  $40 \pm 10$  months on the Containment Penetration Cooling System to satisfy an initial condition for the Integrated Leak Rate Test (ILRT). This walkdown is performed to identify and record leakage within the Containment Penetration Cooling System and has historically been performed by either Inservice Inspection or Quality Control personnel. No system leakage was identified during the last ILRT for either Unit 1 or Unit 2. Although a 10 minute hold time and the use of a VT-2 examiner are not specifically addressed in the ILRT procedure, the non-insulated Containment Penetration Cooling System ordinarily remains in constant service, and the personnel who have performed the system leakage walkdown have typically been VT-2 qualified.

CP&L believes that the leakage walkdown of the entire Containment Penetration Cooling System every  $40 \pm 10$  months, in conjunction with the local leak rate test performed every refueling outage, provides a more frequent and higher quality testing than required by the ASME Code, Section XI and Code Case N-498; therefore, based on the alternate testing results described above, and the recent adoption of ASME Code Case N-498 (Reference NLS-92-300, dated December 22, 1992), which allows alternative testing in lieu of performing the hydrostatic test required by the ASME Code, Section XI, paragraphs IWA-5000 and IWC-5000, CP&L does not plan to perform a belated hydrostatic test on the Containment Penetration Cooling System from the first ten-year interval.

Please refer any questions regarding this submittal to Mr. D. B. Waters at (919) 546-3678.

Yours very truly,



D. C. McCarthy  
Manager  
Nuclear Licensing Section

KAH/kah (nls93020.003)

cc: Mr. S. D. Ebnetter  
Mr. P. D. Milano  
Mr. R. L. Prevatte