

Carolina Power & Light Company

Brunswick Stream Electric Plant

P.O. Box 10429

Southport, North Carolina 28461

1993
APR 23 1992

SERIAL: BSEP-93-0060

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

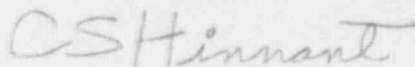
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REPLY TO NOTICE OF VIOLATION

Gentlemen:

On March 25, 1993, the Nuclear Regulatory Commission issued a Notice of Violation for the Brunswick Steam Electric Plant, Units 1 and 2. Details of the underlying NRC inspections are provided in Inspection Report Nos. 50-325/93-08 and 50-324/93-08 dated March 25, 1993. Carolina Power & Light Company hereby responds to the Notice of Violation. Enclosure 1 to this letter provides CP&L's reply to the Notice of Violation in accordance with the provisions of 10 CFR 2.201. Attachment 1 contains the requested information on actions taken and planned to strengthen management control over the fire protection area.

Please refer any questions regarding this submittal to Mr. R. C. Godley at (919) 457-2412.

Yours very truly,



C. S. Hinnant, Director Site Operations
Brunswick Nuclear Plant

GMT/gmt

Enclosures

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

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ENCLOSURE 1

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:

During the Nuclear Regulatory Commission (NRC) inspection conducted February 22, 1993, through February 26, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50 Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Brunswick Specification Number 248-117, Specification for Installation of Piping Systems, requires fire protection piping to be pressure tested in accordance with applicable National Fire Protection Association codes and standards.

National Fire Protection Association (NFPA) Standard 13 requires a minimum design test pressure of 200 psi be maintained without loss for 2 hours.

Contrary to the above, work packages 92-AXCL1 and 92-BEUP1, completed in the November 1992 time frame were inadequate; in that, the hydrostatic test pressures and hold times specified and used after replacement of piping in two fire protection suppression systems to the Service Water Building were incorrect. The fire protection suppression systems piping components were tested to 145 psi for 10 minutes instead of the NFPA required values.

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

RESPONSE TO VIOLATION:

A. Admission of Violation:

Carolina Power & Light Company admits this violation.

B. Reason for Violation

WP-123, Outage Management and Modifications Initiation and Implementation of Work Request/Job Orders, has no reference to the NFPA code required testing for fire protection systems. Typically, work on the fire protection system is performed by the Maintenance Unit and this would have been controlled under MMM-003, Automated Maintenance Management System, which has guidance for involving the Fire Protection Engineer. The field engineer involved in preparing the work package was not aware of the more restrictive NFPA code requirements for Fire Protection systems and PLP-20, Post-Maintenance Testing Program, did not address hydrostatic test requirements of fire protection system components. OSPP-HYDRO500, Pressure Testing of Pipe and/or Vessels, which generally listed Fire Protection Codes was not referenced in PLP-20. The package was reviewed and approved through proper channels and the error was not detected. Post maintenance review of the Work Request/Job Orders (WR/JOs) determined the inappropriate code specification use which resulted in a variance from NFPA requirements.

C. Corrective Actions, Steps Taken, and Result Achieved

Both of the work packages with inadequate hydrostatic tests were re-tested (WR/JOs 93-AHLN1 and 92-BGMT1) to the correct NFPA criteria. The Fire Protection system engineer was involved in the review and concurred with the specified retesting.

A review of the previous Fire Protection work performed by the responsible sub-unit was conducted. It identified only two plant modifications (90-006 and 90-007) and one WR/JO (92-AHMG1) affecting Fire Protection components, but none of these involved hydrostatic testing.

Responsible individuals and the remainder of the sub-unit work group were counseled on the need to contact appropriate specialists in areas of infrequently performed work.

A review of other sub-units' work involving Fire Protection components, completed and planned over the last 3 years, found no hydrostatic testing deficiencies.

PLP-24, Work Management Process, has been issued to supersede both MMM-003, and WP-123. This procedure provides a unified process for any plant employee to identify a plant material problem or deficiency and have it evaluated by plant management.

OSPP-HYDRO500 has been revised to clarify Fire Protection hydrostatic pressure test requirements for piping and system components and involve the fire protection system engineer during the performance of fire protection component testing.

D. Corrective Actions That Will be Taken to Avoid Future Violations

PLP-20 will be revised by July 30, 1993, to address hydrostatic test requirements after repairs/replacements of Fire Protection system components. This will also include a review to insure all other Post-Maintenance Testing Requirements (PMTR) mandated by NFPA Codes are covered.

E. Date of Full Compliance

CP&L is in full compliance with NRC requirements.

ATTACHMENT 1

ACTIONS BEING TAKEN TO STRENGTHEN MANAGEMENT CONTROL OVER THE FIRE PROTECTION AREA

In mid-1992, Technical Support management recognized that the fire protection program was deficient from an engineering standpoint in that the governing procedures for the program were incomplete and did not meet management standards for program control. Resources were allocated to upgrade the program.

The proposed scope of the upgrade was to capture fire protection commitments and revise PLP-1.1, Fire Protection Commitment Document. This ongoing effort is scheduled for completion by July of 1993. This document will then be used as the foundation for reviewing the remaining fire protection related documents. Recognizing the value of the ongoing fire protection upgrade effort, management broadened its scope and included it as Initiative TY-515 in the Brunswick Nuclear Plant Three-Year Plan (1993-1995).

To ensure appropriate management control is maintained over the fire protection area, the Brunswick Plant Operations Unit has reaffirmed its responsibility for maintaining the overall Fire Protection Program. Operations will oversee the Fire Protection Program, including coordination of the ongoing fire protection program upgrades initiated by Technical Support Engineering and the Fire Barrier Reinspection Program currently underway by the Nuclear Engineering Department. Review of PLP-01, Fire Protection Program Document, to ensure the requirements of 10CFR50.48 are met is to be completed by July 30, 1993.