



Carolina Power & Light Company

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

JUL 18 1994

SERIAL:BSEP 94-0262  
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 June 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 50-325/94-12 and 50-324/94-12. 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. P. Lopriore at (910) 457-2212.

Very truly yours,

J. Cowan, Director-Site Operations  
Brunswick Nuclear Plant

SFT/

Enclosures

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

cc: Mr. S. D. Ebnetter, 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  
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

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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 6.8.1 (a) requires that written procedures be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33 Appendix A, November 1972. Regulatory Guide 1.33, Appendix A, requires procedures for maintaining equipment control, procedure adherence, review and approval.

Plant Administrative Instruction AI-58, Equipment Clearance, Rev. 44, Section 5.3.1.14 requires that an operator remove tags and realign the components as required by the Clearance Tag Sheet. Section 5.3.1.18 requires that the clearance preparer/hanger review the Nuclear Revision Control System (NRCS) and verify that drawing(s) referenced in the clearance are correct and the current revision.

Operating Instruction OI-01, Operating Principles and Philosophy, Rev. 56, Section 4.3.1 requires a SRO/Shift Supervisor designate start and stop points if only a portion of a procedure is to be used.

Contrary to the above, the following are examples of failure to follow procedures:

- 1) On May 11, 1994, AI-58 was not adequately implemented in that, 2 clearances tags were found on the High Pressure Coolant Injection System after clearance 2-94-791 had been canceled.
- 2) On May 14, 1994, AI-58 was not adequately implemented in that, circuit breaker 2-2C-TB1-10 was found in the ON position vice the OFF position as required by clearance 2-94-100.
- 3) On May 25, 1994, Operating Instruction OI-01 was not adequately implemented in that control operators modified a procedure to perform only a selected section of the procedure without obtaining SRO/Shift Supervisor review and approval.
- 4) On May 23, 1994, AI-58 was not adequately implemented in that, the licensee failed to verify that the drawings used for clearance 1-94-1167 for the 1A Service Air Compressor were the correct revision. This resulted in the automatic start of the 1B and 1C Service Air Compressor.

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

## RESPONSE TO VIOLATION A:

### Admission or Denial of Violation

Carolina Power & Light admits the violation.

### VIOLATION A, EXAMPLE 1

#### Reason for Violation

Operations personnel overlooked a boundary extension tag sheet when canceling a clearance. The tags on the original boundary were removed and the clearance signed off as complete. The system was not restored to an operable condition at that time, but was left secured pending startup testing.

#### Corrective Actions Which Have Been Taken and Results Achieved

The affected equipment was restored to position as required by the tag sheet.

The event was discussed with the involved shift operators.

An audit of canceled clearances in the 60 day holding file with boundary extensions has been performed. No additional discrepancies were noted.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations

This event will be included in the Operations newsletter.

All corrective actions for Violation A, Example 1 will be completed by July 30, 1994.

### VIOLATION A, EXAMPLE 2

#### Reason for Violation

This violation is due to a failure to adequately self-check when removing a clearance tag and repositioning the breaker. The Equipment Clearance Procedure, AI-58, allows tags to be attached to the panel door, with a piece of red tape across the breaker being cleared. Even though the operator did verify the correct tag and correct breaker, he did not check the remaining tags inside the panel door to ensure no other tags were hanging against the breaker prior to repositioning. The problem was compounded by the failure of maintenance personnel to notify the Control Room when the clearance error was identified.

#### Corrective Actions Which Have Been Taken and Results Achieved

The operator has been counseled regarding expectations when using the Equipment Clearance Procedure, AI-58, and the need to adequately self-check.

AI-58 has been revised to require attachment of clearance tags to actual breaker switches or the locking device in all enclosed electrical panels.

The involved maintenance personnel have been counseled on the importance of

reporting clearance problems as soon as they are identified, as required by AI-58.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations

This event will be reviewed with appropriate Maintenance personnel. Included in this review will be the requirements and expectations for supervisors, clearance holders, and workers relative to AI-58. Specifically, the clearance holder's responsibilities when a clearance problem is identified will be addressed.

The Automated Clearance Management System (ACMS) will be evaluated to determine whether process enhancements are needed to address multiple clearances on a single component.

This event will be included in the Operations newsletter.

All corrective actions for Violation A, Example 2 will be completed by November 11, 1994.

#### VIOLATION A, EXAMPLE 3

##### Reason for Violation

The reactor operator failed to identify the correct procedure to shift heat exchangers. The operator also failed to involve the SRO/Shift Supervisor in identifying the steps of a partial procedure to be performed.

##### Corrective Actions Which Have Been Taken and Results Achieved

The operators have been counseled on the requirements of OI-01, Operating Principles and Philosophy regarding the performance of partial procedures, the responsibilities associated with self-checking, and the need to question non-routine activities to assure proper results.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations

This event will be included in the Operations newsletter.

All corrective actions for Violation A, Example 3 will be completed by July 30, 1994.

#### VIOLATION A, EXAMPLE 4

##### Reason for Violation

This violation is due to an inadequate review of outstanding changes identified in the Nuclear Revision Control System (NRCS) during the development of the clearance.

##### Corrective Actions Which Have Been Taken and Results Achieved

The clearance was researched and properly prepared.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Operations Shift Supervisors will brief their crews on the following information:

what documents are to be reviewed when performing NRCS verification.

what detail of review is appropriate when NRCS identifies that there are outstanding revisions against a document being reviewed in NRCS.

Refresher training or user guides will be provided to individuals using NRCS to assure that they use the process effectively.

All corrective actions for Violation A, Example 4 will be completed by September 9, 1994.

Date When Full Compliance Will Be Achieved

A multi-disciplined task force has been formed to develop a site wide standard for control of equipment manipulation as indicated in response to Notice of Violation 94-07-01. Carolina Power & Light believes this site standard will be effective in reducing the frequency of similar events.

Carolina Power & Light believes it is in full compliance with Technical Specification 6.8.1.

VIOLATION B:

10 CFR Part 50, Appendix B, Criterion VI, Document Control, requires that measures be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which prescribe all activities affecting quality.

Nuclear Plant Modification Program (NPMP) implements these requirements. NPMP, Revision 4, Section 6.2 requires that when a modification is declared operable, the closeout coordinator ensure appropriate notification is provided to the affected plant groups and design organizations to complete revision of plant and design document affected by the modification.

Contrary to the above, on May 17, 1994, NPMP was not adequately implemented in that during a walkdown of Emergency Operating Procedure EOP-01-SEP-05, Primary Containment Purging, it was found that the EOP and drawings LL-90046-I5, I6, I96, LL-90046-X14, X15, X16, X17, and F-97083 were not revised to reflect the changes made when plant modification 90-050 was implemented in January 1993.

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



## RESPONSE TO VIOLATION B:

### Admission or Denial of Violation

Carolina Power & Light admits the violation.

### Reason for Violation

In January, 1993, Banana Jack To Ring Lug Connectors were installed in various control room backpanels to support the Emergency Operating Procedures (EOPs). Work Request/Job Orders (WR/JOs) were used to install the connectors in accordance with EER 89-0186. Plant Drawing Corrections (PDCs) were initiated in January, 1993, to update the drawings. Drawings LL-90046-1005, 1006, 1096, LL-09046-X014, X015, X016, X017, identified in this violation were included in the PDCs. Drawing F-97083 was not included; F-97084 was incorrectly identified as containing all installed banana jacks. The Nuclear Revision Control System (NRCS) tracks outstanding changes to drawings. The Nuclear Plant Modification Program, (NPMP) Revision 4, Section 7.2.2 states: "Revisions to priority 2, 3, 4, and 5 drawings may be performed subsequent to closeout of the modification provided that they are appropriately identified and stated in NRCS." NRCS properly reflected the required changes outstanding against the drawings in question. CP&L believes it was in compliance with 10 CFR Part 50, Appendix B, Criterion VI, with regard to the drawing changes. Carolina Power & Light has retained an architect/engineer to reduce the backlog of PDCs.

Plant Modification 91-050 revised the operation of the 1-CAC-V5 and V6 so that only one control switch exists. Each valve previously had two switches to allow throttling of the valves. Plant Modification 91-050 was declared operable on August 12, 1993. During Modification closeout reviews, EOP-01-SEP-05 revision was identified as being required for startup based on the Plant Modification changes. EOP revisions are not performed at modification operability, but are batch processed prior to startup. Emergency Operating Procedure, EOP-01-SEP-05 was not revised prior to Unit 1 startup to incorporate the changes made by the Plant Modification due to a personnel error. In addition, no mechanism was employed to assist personnel in tracking outstanding EOP changes.

### Corrective Actions Which Have Been Taken and Results Achieved

A PDC has been submitted to update plant drawing F-97083.

EOP-01-SEP-05 has been properly revised with the required information.

### Corrective Steps Which Will Be Taken to Avoid Further Violations

Future EOP revisions, required due to Plant Modification operability, will be assigned an Operations action item to ensure the required revision is implemented prior to startup. A change to OI-26, Operations Review of Plant Modifications, Direct Replacement Packages, Technical Specification Changes, and Procedure Changes As a Result of Technical Specification Changes has been requested to require this action item generation.

PLP-29, Self-Assessment for Readiness to Startup Following an Outage, will be revised to require verification of EOP readiness for startup.

All corrective action for Violation B will be completed by December 30, 1994.

Date When Full Compliance Will Be Achieved

Carolina Power & Light believes it is in full compliance with 10 CFR Part 50, Appendix B, Criterion VI, Document Control.



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. The event described in Violation A, Example 1 will be included in the Operations newsletter.	07/30/94
2. The event described in Violation A, Example 2 will be reviewed with Maintenance personnel.	09/09/94
3. An evaluation of ACMS will be performed to determine whether process enhancements are needed to address multiple clearances on a single component.	11/11/94
4. The event described in Violation A, Example 2 will be included in the Operations newsletter.	07/30/94
5. The event described in Violation A, Example 3 will be included in the Operations newsletter.	07/30/94
6. Operations Shift Supervisors will brief their crews on what clearance documents are to be reviewed and what detail of review is appropriate when NRCS identifies that there are outstanding revisions against a document being reviewed in NRCS.	09/09/94
7. Refresher training or user guides will be provided to individuals using NRCS to assure that they use the process effectively.	09/09/94
8. OI-26 will be revised to ensure required EOP revisions are assigned an Operations internal action item to track completion of the EOP revision.	12/30/94
9. FLP-29 will be revised to require verification of EOP readiness for startup.	12/30/94