



Carolina Power & Light Company

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

March 18, 1983

FILE: B09-13510E
SERIAL: BSEP/83-883

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 & 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE inspection Report 50-324/82-45 and 50-325/82-45 and finds that it does not contain any information of a proprietary nature.

The report identified three items that appear to be in noncompliance with NRC requirements. These items and Carolina Power & Light Company's response to each are addressed in the following text:

Violation A: (Security Level IV)

10 CFR 50, Appendix B, Criterion XVI, required that measures be established to assure that conditions adverse to quality are promptly identified and corrected. The accepted QA Program, FSAR Section 13.4.3.R.3, states that measures shall be established to follow-up on corrective actions to assure proper implementation.

Contrary to the above, the follow-up of corrective actions to assure proper implementation to preclude recurrence was not done adequately in that the licensee's response dated May 24, 1982 to violation "D" noted in inspection Report Nos. 50-324/82-10 and 50-325/82-10, stated that Q-list equipment is now correctly identified on both Tables 1 and 1A of the Plant Operating Manual Vol. XI. Revision 21 dated June 5, 1982, of the Plant Operating Manual Vol. XI lists CAC-LI-2601, CAC-PISH-2702, CAC-FY-2717, SGT-TS 1 thru 7 and RCC-TIC-695 in only one of the Tables.

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Carolina Power & Light Company's Response:

Carolina Power & Light Company acknowledges corrective actions in response to violation "D" of Inspection Report 50-324(325)/82-10 were not adequate in that Tables 1 and 1A of plant Operating Manual (POM) Volume XI (Q-list) were not consistent. This event is attributable to the lack of clear management control in assuring that the scope of the project was clearly defined and that all site subunits responsible for input received adequate direction.

To assure that Tables 1 and 1A of POM Volume XI are consistent, the engineering supervisor of the Discipline Group, under the direction of the Manager - Technical Support, is responsible for performing a thorough review of both tables for inconsistencies internal to the procedure. Inconsistencies will be evaluated and corrected as required. The regulating procedure and format of the two tables is also being reviewed and will be revised as required to assure that the identification of Q-list items is consistent and that the procedure is correct. These reviews, any required revisions, and a mechanism for preventing future similar occurrences will be completed by May 15, 1983.

Violation B: (Security Level V)

Technical Specification 6.8.1.a requires that procedures identified in Appendix A of Regulatory Guide 1.33, November 1972 be established and implemented. Section H.2 of Appendix A requires procedures to assure that safety-related instruments are properly calibrated at specified intervals. Section H.1 of Appendix A requires procedures be provided to calibrate measuring devices such as alarm devices.

Contrary to the above, on November 16, 1982, a procedure has not been established to calibrate level instrument C41-LI-R001, used to periodically verify standby liquid control (SLC) system volume per Technical Specification 4.1.5 and to calibrate C41-LS-N600 and C41-TS-N003, used as an alarm device for the SLC system.

Carolina Power & Light Company's Response:

Carolina Power & Light Company acknowledges that procedures were not in place to require periodic calibrations on instruments C41-LI-R001, C41-LS-N600, and C41-LS-N003. Calibration procedures for these instruments did exist and were used whenever maintenance on these components required that they be calibrated; however, they were not calibrated on a periodic basis.

The failure to have these instruments on a periodic calibration schedule was caused by the non availability of a complete listing of those instruments requiring calibration addressed in Regulatory Guide 1.33, Appendix A. Maintenance personnel used Tables 1 and 1A of POM Vol. XI, Book 2, as a reference to identify safety related instrumentation not addressed in Technical Specifications which required periodic calibration. Neither of these Tables contain the identified instruments.

The instrumentation identified by this violation has been entered onto the Master Surveillance & Test Program to assure that they are periodically calibrated in the future. A program is currently underway to assure that instrumentation required to verify Technical Specification parameters is identified and placed on a periodic calibration schedule. The review and identification of this instrumentation should be complete by June 15, 1983, and instrumentation identified not already on a periodic calibration schedule will be placed on a periodic scheduling system by July 31, 1983.

Violation C: (Severity Level V):

Technical Specification 6.5.1.6 requires the Plant Nuclear Safety Committee to review procedures required by Technical Specification 6.8 and changes thereto, and any other proposed procedures or changes thereto as determined by the General Manager to affect nuclear safety.

Contrary to the above:

1. Surveillance procedure PT-3.1.2.1, required by Technical Specification 6.8 was not adequately reviewed on September 21, 1982, in that the procedure specified a surveillance frequency exceeding that required by the associated Technical Specification.
2. Operating Instruction OI-3, required by the General Manager to be reviewed by the PNSC, was not adequately reviewed on September 23, 1982, in that the procedure specified that PT-03.1.21 be completed quarterly whereas Technical Specifications require a 31 day frequency.
3. Surveillance procedure PT10.1.1, required by Technical Specification 6.8, was not adequately reviewed on November 16, 1982, in that the procedure does not require the reactor core isolation cooling flow controller to be re-positioned to its design setpoint.

Carolina Power & Light Company's Response:

Carolina Power & Light acknowledges that the plant Nuclear Safety Committee (PNSC) failed to assure that an adequate review was performed on the revised procedures identified. The responsibility for assuring that new procedures and revisions to existing procedures are correct belong with the management of the subunit responsible for that procedure, with a final review being performed by PNSC. Two of the examples (1 and 2) involved changes relating to the same procedure (PT-3.1.21), making the periodicity consistent with ASME requirements. Example 3 was caused by a personnel oversight while reformatting the final system verification lineup.

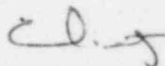
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In an effort to prevent events of this nature in the future, the plant is drafting a new program for procedural review and approval. This program will better define the requirements and responsibilities of the reviewers, and will increase the number of persons and the qualifications of those persons required to review each procedure. The procedure defining this program will soon be in final draft and will be sent out to management for final comments. Pending final comments, this procedure should be approved and the program be operational by April 15, 1983. Until this procedure has been approved, the General Manager has directed that all procedures brought to PNSC be verified correct by the subunit manager in charge of that procedure.

Very truly yours,



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

RMP/dj/LETGC4

Enclosure

cc: Mr. R. C. DeYoung
NRC Document Control Desk