

USNRC REGION
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Carolina Power & Light Company

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

December 31, 1982

FILE: B09-13510E
SERIAL: BSEP/82-2983

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
LICENSE NOS. DPR-71 AND DPR-62
DOCKET NOS. 50-325 AND 50-324
SUPPLEMENTAL RESPONSE TO A VIOLATION OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

In our letters of August 18, 1982, and September 15, 1982, which responded to violation "B" contained in IE Inspection Report 50-324/82-23 and 50-325/82-23, Carolina Power & Light committed to provide a complete response by December 31, 1982. This letter satisfies that commitment.

Violation B: (Severity Level V)

Technical Specification Surveillance Requirement 4.0.5 requires that ASME Code Class 1, 2 and 3 components be inservice inspected until commercial operation in accordance with ASME B&PV Code Section XI 1974 Edition and Addenda through Winter 1975; and that after commercial operation the inspections be conducted in accordance with the applicable Edition of Section XI required by 10CFR50.55(a). ASME Section XI 1974 edition specified that for plants built to piping standards other than ASME, Reg. Guide 1.26 was to be used to establish the quality standards equivalent to ASME Code Class 2 and 3. Regulatory Guide 1.26 specifies that for boiling water plants the main steam lines between the containment isolation valve and the turbine stop valve should be considered Quality Group B Equivalent to ASME Class 2.

Contrary to the above, the requirement to classify the main steam as equivalent to ASME Class 2 was not met in that the ISI Programs for both Brunswick units excluded the main steam lines from the Class 2 inspection requirements.

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Mr. James P. O'Reilly

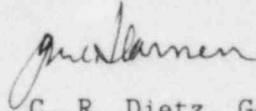
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Carolina Power & Light Company's Response:

Carolina Power & Light acknowledges that the failure to classify the main steam lines as equivalent to ASME Class 2 is a violation of NRC requirements. This classification error occurred while upgrading the ISI program in 1980. During the review and establishment of the ISI boundaries, it was noted that the Regulatory Guide 1.29 definition of a safety system implied that beyond the first support of the outboard MSIV was not considered a safety system; therefore, it was assigned at that time as ASME Class 4. Further reviews now indicate that this was contrary to Regulatory Guide 1.26 guidance for classifying Class 2 systems.

All boundaries at the Brunswick station are currently being reviewed to assure proper system classification. This review and final classification will be completed by March 31, 1983.

Very truly yours,



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

RMP/mcg/LET CG

cc: Mr. R. C. DeYoung