



Carolina Power & Light Company

Company Correspondence

Brunswick Nuclear Project
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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:

The Brunswick Steam Electric Plant (BSEP) has received NRC Inspection Report 50-325/91-03 and 50-324/91-03 and finds that it does not contain information of a proprietary nature. This report included a Notice Of Violation.

Enclosed is Carolina Power & Light Company's response to that Notice Of Violation.

Very truly yours,

J. W. Spencer, General Manager
Brunswick Nuclear Project

WRT/

Enclosure

cc: Mr. S. D. Ebnetter
Mr. N. B. Le
BSEP NRC Resident Office

VIOLATION

10CFR 50.47 (b) (8) states that the emergency plan must meet the following standard: "Adequate emergency facilities and equipment to support the emergency response are provided and maintained". Section 5.0 of the Radiological Emergency Plan describes the emergency facilities and equipment, including the Technical Support Center (TSC) and Emergency Operations Facility (EOF).

Plant Emergency Procedure PEP - 04.2, "Emergency Facilities and Equipment" specifies that "Emergency Facilities and Equipment shall be maintained and kept operational". PEP - 04.2 designates the TSC and EOF as emergency facilities.

Contrary to the above, from approximately December 1983, when construction of the building housing the TSC and EOF was nominally finished, until February 15, 1991, the Licensee did not conduct adequate maintenance to assure that the TSC and EOF were operational in that there was no adequate procedure in place to assure that the emergency ventilation system for the TSC and EOF was operational.

This is a Severity Level IV Violation (Supplement VIII).

RESPONSE

I. Admission or Denial of the Alleged Violation:

CP&L acknowledges the violation in that an adequate procedure was not in place that assured adequate maintenance and testing of the emergency ventilation system for the TSC and EOF

II. Reason for the Violation:

The Plant Modification for construction of The EOF/TSC building was completed and declared operable in December, 1985. Procedures for testing and maintaining the Emergency Air Filtration system were not properly integrated into plant procedures, and responsibilities for testing/ maintenance were not clearly assigned. It was noted that identification tags for dampers and components were missing, two dampers were disconnected and copper moisture drain lines were damaged.

Prior to the February 4-8, 1991 inspection two periodic test procedures were in place for the EOF/TSC emergency ventilation system. PT 93.0 (EOF/TSC Building Emergency System Test) specified the process for periodically testing the charcoal absorber banks, system flow, and DOP removal efficiency on each filter. PT 94.0 (EOF/TSC Building Emergency Ventilation System Lineup Verification) verifies proper EOF/TSC Building Emergency Ventilation system electrical breaker lineup. There was not a periodic test in place that verified complete

operability of the ventilation system by confirming damper positioning and that a positive pressure is maintained.

III Corrective Steps Which Have Been Taken and Results Achieved:

An operability test including damper positioning and positive pressure has been completed and documented in Engineering Evaluation Report (EER) No. 91-0074. PT 93.0 was revised on 3/27/91 to include a complete operability test at least once every 18 months. The additions to the procedure include the manual initiation of the Emergency Air Filtration System; verification of damper position and a test to measure positive pressure.

Emergency Air Filtration dampers and components have been properly labeled, and the copper moisture drain lines have been replaced and covered to prevent future damage.

The two disconnected dampers were not required for ventilation system operation. The dampers had been previously removed, but the actuators were left in place.

IV. Corrective Action Which Will be Taken to Avoid Further Violations:

The operability test required by PT 93.0 is sufficient to avoid further violations. PT's 93.0 and 94.0 are tracked on the Surveillance Test Scheduling and Tracking System to ensure proper test frequency.

V. Date When Full Compliance Will be Achieved:

Full compliance has been achieved with Emergency Air Filtration System operability documented on 2/28/91 and revision 2 to P1 93.0 which was approved on 3/27/91.