



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

October 21, 1994

SERIAL:BSEP 94-0392
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 September 21, 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 50-325/94-24 and 50-324/94-24. 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. G. M. Thearling at (910) 457-2038.

Very truly yours,

J. Cowan, Director-Site Operations
Brunswick Nuclear Plant

GMT/

Enclosures

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

cc: Mr. S. D. Ehneter, Regional Administrator, Region II
Mr. P. D. Milano, NRR Senior Project Manager - Brunswick Units 1 and 2
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector
The Honorable Hugh Wells, Chairman of the N.C. Utilities Commission

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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
None	

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 :

During the Nuclear Regulatory Commission (NRC) inspection conducted on July 30 -September 2, 1994, 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:

Technical Specification 2.3.1 Appendix B, requires that the water level in the discharge canal shall normally be maintained between +3.5 feet and +5.5 feet above mean sea level at the discharge weir. These limits may be exceeded as required for either plant maintenance or as a result of natural conditions.

Contrary to the above, on July 6-8, 1994, the canal discharge level exceeded 5.5 feet for a period of approximately 36 hours. During this period, canal level reached a height of over eight feet with no active maintenance activities in progress. The canal level went high after two ocean discharge pumps were secured due to a misperception of a low canal level at the pumping station.

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

RESPONSE TO VIOLATION A :

Admission or Denial of Violation

Carolina Power & Light denies this violation

Reason for Denial

Beginning in late June 1994, problems were encountered with the Circulating Water Ocean Discharge (CWOD) pumps. These problems included high temperature and motor overload alarms which required stopping the pumps repeatedly to backflush motor coolers. On July 2, 1994, a motor fire rendered the 2D CWOD Pump inoperable. The 2D CWOD Pump motor was removed from the system over the holiday weekend and sent to the vendor on July 4, 1994, for repair on an expedited basis (return to service on July 21, 1994).

Problems continued to be encountered with motor temperature alarms on the remaining pumps. Operations continued an escalated backflushing of CWOD pump motor coolers. While the monitored discharge canal level was in the normal operating band, Operations questioned whether an abnormally low canal level at the pumping station was contributing to the problems. Engineering support was requested to investigate the canal issues including the canal level gradient. An abnormal discharge canal level gradient was indicative of a possible obstruction somewhere in the discharge canal.

On July 6, 1994, Operations personnel at the Caswell Beach pumping station observed increases in motor current readings on two of the Unit 2 CWOD pump motors and became concerned that the motors were in danger of tripping on overcurrent. An abnormally low canal level at the discharge station could cause high motor amperage and the motor temperature alarms which were being observed. In a troubleshooting effort, Operations intentionally shifted discharge pumps to a configuration that would raise canal level, with the possibility that the normal Technical Specification Limit at the entrance to the discharge canal would be exceeded, in the effort to reduce operating CWOD pumps motor amperage.

Operations was monitoring and recording canal level twice per 12 hour shift exceeding the Appendix B Technical Specifications requirement to monitor discharge canal level at the entrance to the discharge canal of once per day. Level indications taken following the realignment of pumps did not indicate a significant rate of increase in canal level. While level was being raised, it was not expected to exceed the normal Technical Specification limit prior to the next reading. The next local reading, taken about four hours later, discovered the high level. Due to the extent of the level increase all available pumps were started to lower level. Discharge canal level was restored to the normal operating band on July 8, 1994.

The Plant Technical Specifications allow operation outside the normal level band for maintenance. CP&L believes this pump operation was part of troubleshooting related to CWOD pump high motor amperage and is within the intent of the maintenance allowance. The Technical Specification does not require any compensatory actions other than the implied restoration of canal level on completion of maintenance activities. CP&L therefore believes no violation of the Technical Specifications occurred.

Date When Full Compliance Will Be Achieved

Carolina Power & Light is in full compliance.