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June 22, 1995

SERIAL:BSEP 95-0304  
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 May 25, 1995, 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 50-325/95-10 and 50-324/95-10. 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. D. Hicks at (910) 457-2163.

Very truly yours,



Roy A. Anderson

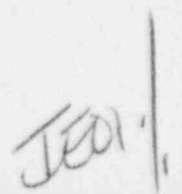
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Enclosures

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

cc: Mr. S. D. Ebner, Regional Administrator, Region II  
Mr. D. C. Trimble, NRR Project Manager - Brunswick Units 1 and 2  
Mr. C. A. Patterson, 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:

10 CFR 50, Appendix B, Criterion VII, (Control of Purchased Material, Equipment, and Services) requires that the licensee maintain control of purchased goods and services and the effectiveness of the control of quality by contractors.

Contrary to the above, these requirements were not met for the following four examples during contractor services provided for the Unit 1 control blades pins and rollers replacement, eventually resulting in the termination of the project:

1. On April 11, 1995, care was not used to avoid contact of other structures during movement of a control rod blade to a curb hanger storage location. A blade contacted a fuel rack containing fuel tilting the blade to the pool wall about 18 inches away where the blade stopped in an unhooked condition.
2. On April 12, 1995, care was not used to avoid contact of other structures during movement of a control rod blade to a curb hanger location. A blade contacted a pipe just beneath the storage location tilting the top of the blade against a fuel rack where the blade stopped in an unhooked condition.
3. On April 19, 1995, a clear plexiglass viewing box used during the control rod blade pin and roller replacement was not properly secured to prevent it from being drawn into the Spent Fuel Pool skimmer surge tank.
4. On April 23, 1995, independent verification of control blade movement was not adequately performed to prevent an incorrect blade from being moved from its storage location in the pool.

This is a Severity Level IV violation (Supplement I). This is applicable to Unit One only.

## RESPONSE TO VIOLATION A:

### Admission or Denial of Violation

Carolina Power & Light denies the alleged violation.

### Basis for Disputing the Violation

10 CFR 50, Appendix B, Criterion VII, Control of Purchased Material, Equipment, and Services, requires that "Measures shall be established to assure that purchased... services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents... The effectiveness of the control of quality by contractors and subcontractors shall be assessed by the applicant or designee at intervals consistent with the importance, complexity, and quantity of the product or services."

The contractor was selected to perform the Pins and Rollers modification based on their expertise and previous successes at other nuclear stations. Additionally, prior to the contract award, a CP&L representative observed the modification process by the contractor at another station. At Brunswick, CP&L provided constant assessment of the project through the project implementation team (Figure 1). CP&L added additional personnel twice to this team to ensure the quality of the job. All adverse conditions were self-identified, documented, and vigorously investigated in accordance with CP&L's Corrective Action Program. The investigations involved senior CP&L site management and senior contractor management. CP&L's established measures to assure proper conformance to the contract led to the contract termination based on the contractor's failure to control the work processes. Based on the continuing assessment provided by CP&L and the resolutions of adverse conditions identified through the plant's Corrective Action Program, CP&L believes it was in full compliance with 10 CFR 50, Appendix B, Criterion VII.

On April 12, 1995, the contractor was moving Control Rod Blades (CRBs) from the core to the spent fuel pool. While lowering the second CRB into its storage position, the blade contacted a spent fuel rack and pivoted on the Control Rod velocity limiter allowing the latch assembly to unlatch due to contact with the fuel pool wall. CP&L directed retrieval of the CRB and stopped all work associated with the movement of CRBs pending investigation. The event was documented by a Condition Report; an investigation convened; and corrective actions were implemented. Movement of the remaining CRBs was completed with no similar incidents.

On April 13, 1995, it was noted that one of the six CRBs had become disengaged from its hanger with the hanger still properly seated on its curb holder. The blade was retrieved and returned to the transfer can. CP&L stopped all work and a formal Root Cause Analysis was initiated in accordance with CP&L's Corrective Action Program, which included review of the previous event on April 12 for related causes. Corrective actions included meetings between CP&L management and contractor project personnel to discuss the two events, root causes, and changes in procedures to prevent recurrence. Additional CP&L management oversight personnel were added to the project team to monitor project activities on the refuel floor. Corrective actions were effective in preventing recurrence.

On April 19, 1995, a plexiglass view box was drawn into the spent fuel pool skimmer surge tank through the east weir. CP&L stopped all Pins and Rollers work activities and initiated an investigation. Senior CP&L site management requested that additional senior off-site contractor management be directly involved in extensive discussions to consider provisions and expectations for

job continuance. At CP&L's insistence, the contractor senior management implemented additional surveillance plans including providing additional management presence and reconstituting the work crews to maximize experience levels. Based on the implementation of these actions, which included a commitment by the representatives of the responsible Vice President to the CP&L expectation of no further performance failures, CP&L allowed the contractor work to proceed. CP&L also added operational personnel to the project team to provide additional oversight at the punching station and on the refueling bridge when CRBs were being moved (Figure 2). Corrective actions were effective in preventing recurrence of this event.

CP&L conducted briefings with contractor project personnel and authorized recommencement of work April 22. The next day, April 23, the contractor was preparing to move a CRB from its storage site to the punching station. The CRB had been partially lifted when CP&L personnel on the oversight team noted that the contractor was lifting the wrong blade. CP&L directed the contractor to return the blade to its storage location and then stopped work. CP&L terminated the project due to the failure of the contractor to perform the job to the standards and expectations of CP&L management.

In summary, CP&L provided appropriate measures to assure proper conformance to the Pins and Rollers Project contract through self identifying problems and implementing corrective actions.

Date When Full Compliance Will Be Achieved

Carolina Power & Light believes that it is in full compliance.

FIGURE 1

PROJECT IMPLEMENTATION ORGANIZATION

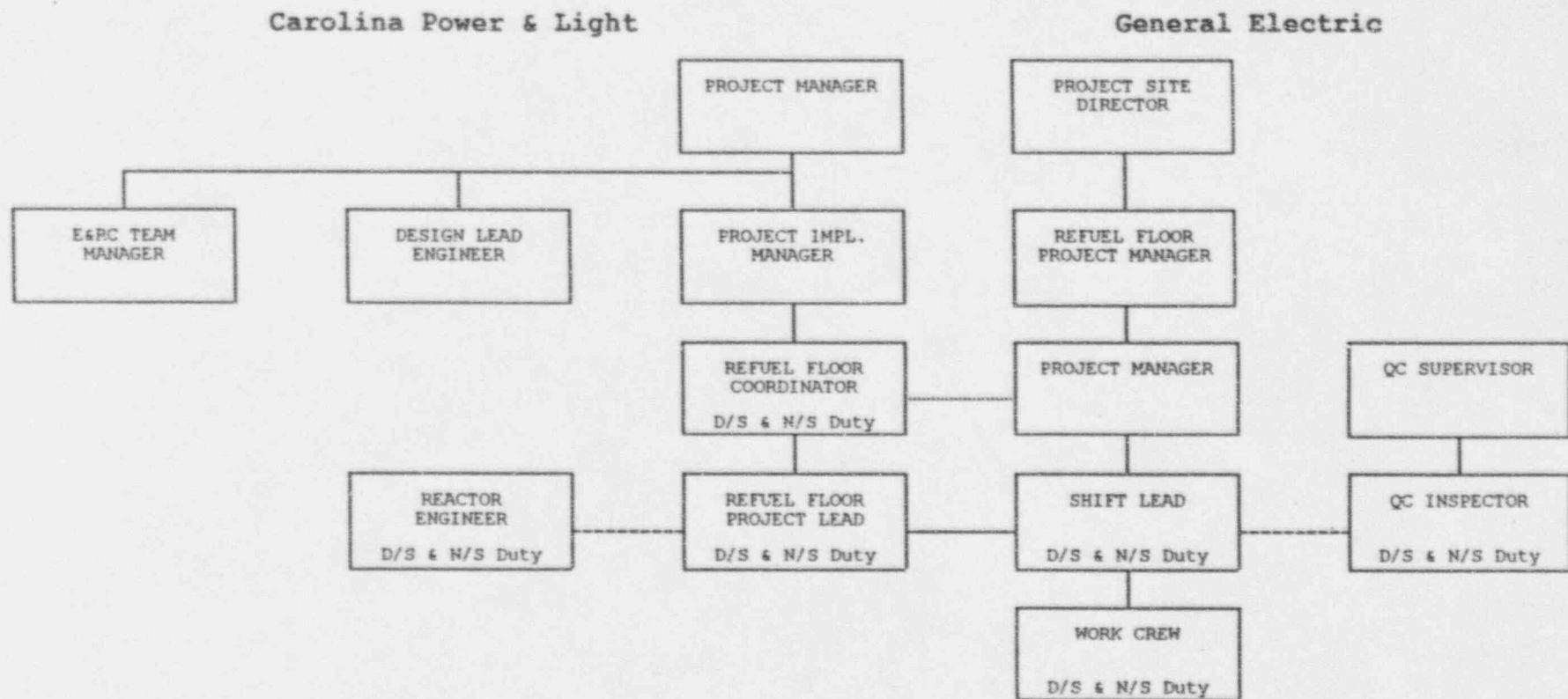
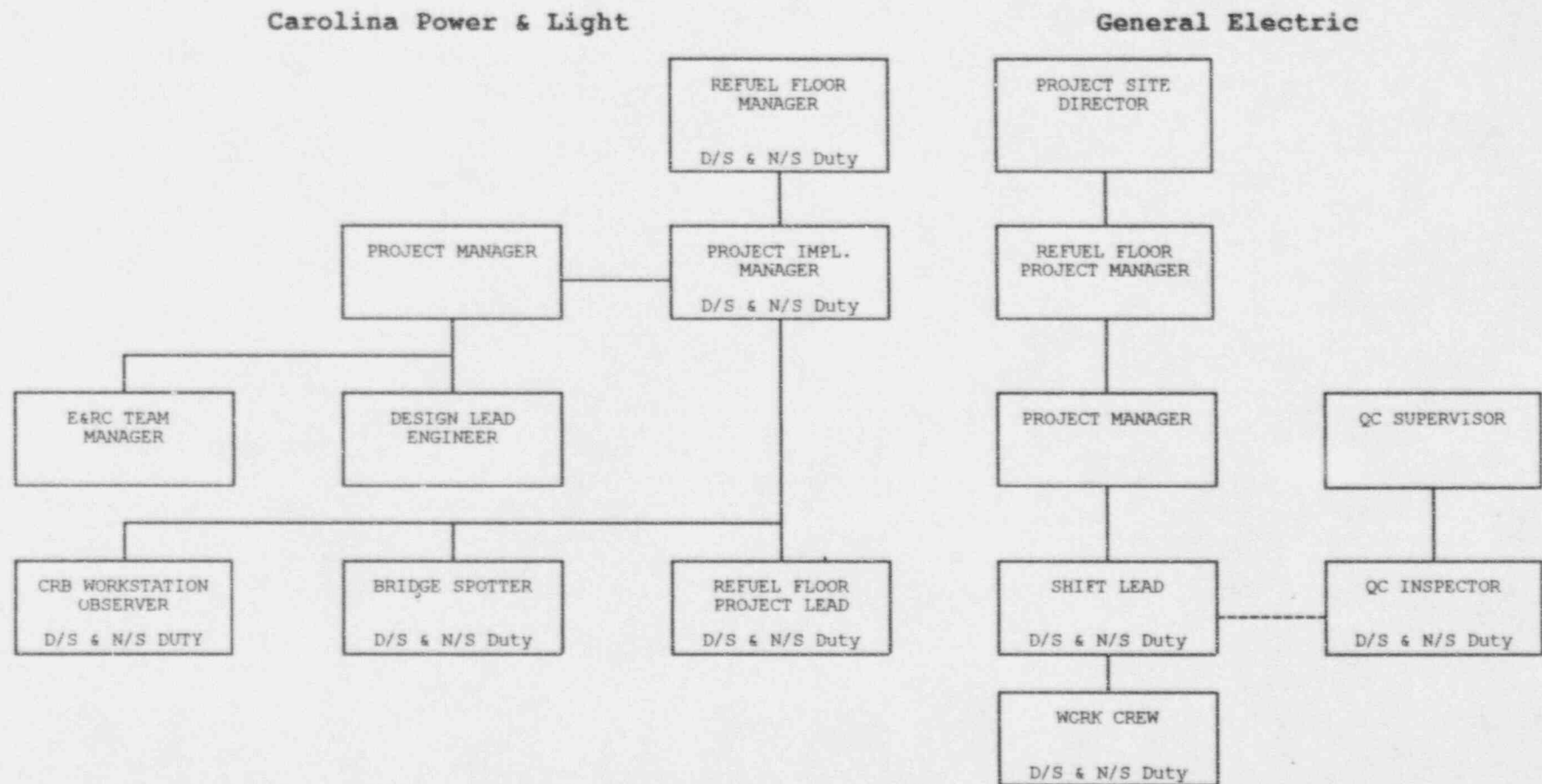


FIGURE 2

PROJECT IMPLEMENTATION ORGANIZATION



VIOLATION B:

10 CFR 50, Appendix B, Criterion V, (Instructions, Procedures, and Drawings) requires that activities affecting quality shall be prescribed by documented instructions appropriate to the circumstances.

Contrary to the above, on April 10, 1995, neither the implementation package for Plant Modification 92-146, Deletion of Main Steam Line High Radiation Trip, nor implementing WR/JOs 94-AJDL3 and 94-AJDL4 contained instruction to install jumpers which would have prevented the Group 2, 6, and 8 isolations. The Group 8 isolation resulted in Unit 1 losing shutdown cooling for approximately 50 minutes.

This is a Severity Level IV violation (Supplement I). This is applicable to Unit 1 only.

RESPONSE TO VIOLATION B:

Admission or Denial of Violation

Carolina Power & Light admits the violation.

Reason for Violation

This violation was due to the installation instructions in Plant Modification 92-146 not properly isolating the modification from other operable equipment. The modification implementation planner did not carry out his responsibility to ensure that the modification work was isolated. This resulted in circuitry, affecting other systems, becoming deenergized.

Corrective Actions Which Have Been Taken and Results Achieved

1. Outage modification packages affecting logic were pulled from the field and reviewed by engineering and by the implementation group to ensure work could be performed safely for those modifications. There were no additional problems noted in the review.
2. The modification packages for 92-146 were revised to correct deficiencies prior to restarting work in the field.
3. The expectations and procedural requirement that the implementation plan, including requested clearances, should ensure isolation of the work from other Technical Specification operable equipment have been reinforced for appropriate personnel within the Projects organization.

Corrective Steps Which Will Be Taken to Avoid Further Violations

None

Date When Full Compliance Will Be Achieved

Carolina Power & Light believes that it is in full compliance.

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
None.