



Carolina Power & Light Company

Brunswick Steam Electric Plant

JUN 19 1992

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10CFR 2.201

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

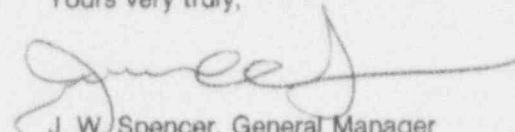
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-72
REPLY TO NOTICE OF VIOLATION

Gentlemen:

The Brunswick Steam Electric Plant has received NRC Inspection Report 50-325/92-11 and 50-324/92-11 and finds that it does not contain information of a proprietary nature. This report included (2) Notices of Violation.

Enclosed is Carolina Power & Light Company's response to Notice of Violation 92-11-02. Due to continuing research into original construction documentation and the difficulties encountered in contacting a former Carolina Power and Light employee involved in the 1987 seismic evaluation of the Control Building Emergency Air Filtration system, a request was made to NRC Region II to extend the response to June 24, 1992. Per telephone conversation with Bob Carroll this extension was granted on June 18, 1992. The response to Notice of Violation 92-11-01 will be submitted by the extended date.

Yours very truly,



J. W. Spencer, General Manager
Brunswick Nuclear Project

SFT/

Enclosure

cc: Mr. S. D. Ebner
Mr. R. H. Lo
BSEP NRC Resident Office

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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:

During an NRC inspection conducted on April 1 - May 1, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, (1992), the Violations are listed below:

- A. Technical Specification 3.7.2 requires that two independent control room emergency filtration systems shall be operable and allows one control room emergency filtration system to be inoperable no more than seven days or shut both units down.

Contrary to the above, on April 13, 1992, the 2A control building emergency air filter was found not to be fastened on one side, which rendered it seismically inoperable. This condition had existed since initial installation. Due to this condition, train 2A of the control room emergency filtration system has been inoperable (but available) since initial plant operation. The licensee had three opportunities to identify this condition; initial testing and during the 1987 and 1992 inspections and evaluations for seismic qualification.

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

- B. Technical Specification 6.5.4.7 requires that Nuclear Assessment Department (NAD) personnel who perform independent safety reviews not be directly involved in the activities which they review. CP&L Corporate Quality Assurance Manual section 13.3 requires that personnel performing assessments not have direct responsibility in the areas they are assessing.

Contrary to the above, five NAD personnel were assigned to assist plant personnel in an inspection of plant systems and equipment not accessible during power operation, to develop a deficiency list. This line function inspection started on April 27, 1992, during a dual unit outage and the NAD assistance continued until April 29, 1992.

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

Response to Violation B:

Admission or Denial of Violation:

Carolina Power & Light Company admits to this violation.

Reason for the Violation:

Following the Brunswick dual unit shutdown on April 21, 1992, the Technical Support (TS) Manager discussed with the Nuclear Assessment Department (NAD) Manager his plans for a thorough walkdown of the Unit #2 areas not normally accessible for inspection at power. The NAD Manager indicated he was also interested in performing a similar inspection; however, due to manpower constraints, he could devote only one FTE (full time equivalent) inspector for 3 days (24 man-hours total). The perceived advantage was that NAD could assess TS engineer inspections while utilizing the processes TS had established to address inspection discrepancies and for coordination of Health Physics personnel support efforts.

On April 28, 1992, during the Morning Manager's Meeting, the NAD Manager conducted a briefing on the inspection which was planned to start that day. Following the meeting, the NRC Senior Resident Inspector questioned the NAD Manager concerning the inspection plans because of his concerns that it would not be possible to inspect and assess at the same time while maintaining the necessary and proper independence. The NAD Manager disagreed with the NRC Senior Resident Inspector's interpretation on this independence issue but did relay the NRC Senior Resident Inspector's concerns to his Department Head with the recommendation to proceed with the inspection as planned. Two NAD inspectors were deployed for the inspection on April 28, 1992, providing approximately 9 man-hours of inspection assistance.

On April 29, 1992, the NRC Senior Resident Inspector informed the NAD Manager that he considered the on-going inspection to be in violation of Brunswick Technical Specification 6.5.4.7. At that point the NAD Manager secured the NAD inspection effort.

It is noted that the violation, as stated, indicates the inspection started April 27 and ended April 29, 1992 with 5 NAD personnel assigned to perform the inspection. Although the NAD inspection was planned to utilize 5 NAD personnel for a total of approximately 24 man-hours, in fact, the NAD inspection assist was limited to approximately 9 man-hours on April 28, 1992 utilizing 2 NAD personnel only.

The NAD Manager believed a simultaneous inspection/assessment of the plant could be conducted in conjunction with a Technical Support inspection without compromising the independence of NAD. While he discussed this with the NRC Senior Resident Inspector, the NAD Manager considered the Inspector conservative in his interpretation of "independence" and proceeded with the inspection until informed later by the NRC Senior Resident Inspector that he (the NRC Inspector) considered the action to be in violation of Technical Specifications.

Corrective Steps Which Have Been Taken and Results Achieved:

The NAD Department Manager counseled the NAD Manager on the need for strict independence of NAD personnel.

On April 28, 1992, the NAD Department Manager notified other site NAD Managers of the concern regarding strict independence of NAD personnel and instructed the NAD Managers to identify and resolve any "gray" areas of involvement.

On June 9, 1992, a Standing Instruction was entered into the NAD Procedures Manual providing guidance to NAD employees with respect to the need for strict independence.

The NAD Manager briefed the NAD Section Managers on the "independence" issue on June 11, 1992.

Corrective Steps That Will Be Taken To Avoid Further Violation:

The June 9, 1992 Standing Instruction providing guidance to NAD personnel on required independence will be incorporated into the next scheduled revision of the Corporate Quality Assurance Manual, Section 13.3.

Date When Full Compliance Will Be Achieved:

Carolina Power and Light believes that full compliance has been achieved.