



Carolina Power & Light Company

Brunswick Nuclear Project
P. O. Box 10429
Southport, N.C. 28461-0429
JUN 24 1992

FILE: B09-13510C

10CFR2.201

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

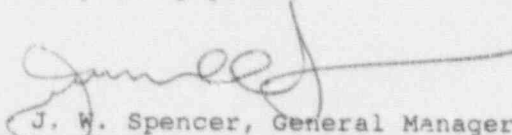
BRUNSWICK STEAM ELECTRIC PLANT UNIT 1 & 2
DOCKET NOS. 50-325 & 50-324
LICENSE NOS. DPR-71 & DPR-62
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

The Brunswick Steam Electric Plant (BSEP) has received NRC Inspection Report 50-325,324/92-11-01 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

RSK/

Enclosure

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

300053
9207010222 920624
PDR ADOCK 05000324
Q PDR

TEOL
11

ENCLOSURE

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 & 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NO. DPR-71 & DPR-62
REPLY TO NOTICE OF VIOLATION

VIOLATION 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).

Reference: Inspection Report 92-11

RESPONSE TO VIOLATION:

Admission or Denial of Violation:

CP&L accepts the violation.

REASON FOR VIOLATION:

The historical document investigation into the cause of the Control Building Emergency Air Filtration (CBEAF) missing clip angle welds has produced limited information. The original construction print did not show the clip angle welds. A revision to this drawing added detail 'W', which shows the clip angle welds with a note 'to be installed by others'. The historical records indicate that the print containing detail 'W' was in effect at the time the 2A CBEAF unit housing was mounted on the foundation in November, 1973. As a result, the reason the clip angle welds were not installed cannot be determined from the historical records. The Brown & Root Equipment Record Card does contain a Quality Control (QC) inspection sign-off in December, 1974, for the 2A CBEAF housing installation. The extent of this QC inspection could not be determined from the equipment record card and other associated documents.

In October 1987, an engineering request memorandum was issued on the CBEAF units identifying bent studs, nuts that were not tightened down, and vibration isolators that were out of adjustment. The memorandum requested an evaluation on the effect of these conditions relative to CBEAF operability/seismic qualification. The individual who performed this evaluation is no longer employed by Carolina Power & Light but was contacted concerning this evaluation. The discussion indicated that the subject of the evaluation was the bent studs, however; an overall inspection of the unit was performed at that time. The individual indicated that he did look on the underside of the unit where the clip angles are located, but did not notice the welds were missing. The inspection and evaluation performed by this individual addressed the bent studs, nuts that were not tightened and vibration isolators that were out of adjustment; however, it did not identify the missing clip angle welds.

In April 1992, an auxiliary operator raised a seismic concern on the 2A and 2B CBEAF units due to bent anchor bolts not making full contact with the I beam. A 24 hour Limiting Condition for Operation was initiated to have an operability evaluation performed on both units. The Technical Support group was notified and they contacted the Nuclear Engineering (NED) group. An NED engineer performed a preliminary engineering evaluation on both CBEAF units. Based on the preliminary evaluation, the NED engineer decided to focus on qualifying the 2B CBEAF unit first. A more detailed examination on the 2B CBEAF unit was subsequently performed.

Based on information provided by the Technical Support group, an NRC Resident Inspector thought that the NED engineer had finished evaluating the 2A CBEAF unit. As a result, the inspector proceeded to perform an examination of the 2A CBEAF unit and noted that the clip angles were not welded to the unit. He then notified personnel in the Technical Support group and they contacted the Control Room to declare the 2A CBEAF unit inoperable due to seismic concerns.

The third event should not be considered a missed opportunity to find the unwelded clip angles since the NED evaluation was still in progress when the NRC Resident notified licensee personnel of the condition.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED:

The welds were fabricated at the clip angles that attach the equipment to the foundation beam. The 2A CBEAF unit is seismically qualified.

CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

A revision to the ENP-12, Engineering Evaluation Procedure will be made to emphasize the need to thoroughly verify as-built records and field inspections including the functional attributes prior to making an operability assessment.

Training on the ENP-12 revision will be provided to appropriate Technical Support and NED personnel.

Revisions to the DG-II.20, Design Guide for Civil Structural Operability and DG-III-16, Brunswick Nuclear Project Structural Scope Documents will be made. These revisions will stress the importance of comprehensive field inspections to ensure acceptability of relevant civil functional attributes for qualification of equipment.

Training on DG-II.20 and DG-III.16 will be provided to appropriate NED personnel.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

CP&L is in full compliance.