

CP&L

Carolina Power & Light Company

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P2: 37

Brunswick Steam Electric Plant

P. O. Box 10429

Southport, NC 28461-0429

841121

FILE: B09-13510C
SERIAL: BSEP/84-2472

Mr. James P. O'Reilly, Administrator
U.S. Nuclear Regulatory Commission
Suite 2900
10 Marietta Street, NW
Atlanta, GA 30323

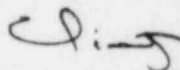
BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/84-27 and 50-324/84-27 and finds that it does not contain information of a proprietary nature.

This report identified one item that appeared to be in noncompliance with NRC requirements. Enclosed please find Carolina Power & Light Company's response to this violation.

Very truly yours,



C. R. Dietz, General Manager
Brunswick Steam Electric Plant

TEC/clh/LETC1

Enclosure

cc: Mr. R. C. DeYoung
NRC Document Control Desk

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Q PDR

RESPONSE TO VIOLATION
INSPECTION REPORT 50-324/84-27 AND 50-325/84-27

Violation (Severity Level V)

10CFR50.59(b) requires a safety evaluation which provides the bases for the determination that the change (to the facility) does not involve an unreviewed safety question; 50.59(a)(2) states, "a change involves an unreviewed safety question if the probability of . . . malfunction of equipment important to safety . . . may be increased."

Contrary to the above, an inadequate safety evaluation was performed prior to removing the automatic minimum flow capability from the core spray systems on Unit 1 during the period June 1-9, 1984. The removal increased the probability of malfunction of equipment important to safety for certain conditions under which the pumps could have been called upon to perform a safety function.

Response

1. Admission or Denial of the Alleged Violation

Carolina Power & Light agrees the violation occurred as stated.

2. Reasons for the Violation

The cause of this violation was a failure by plant Operations personnel to obtain a formal evaluation from plant Engineering prior to making the decision not to declare the core spray pump inoperable when the involved minimum flow valves were secured shut.

The evaluation which was performed was an expedited, informal evaluation based on the knowledge and experience of the personnel involved. Although it was recognized that the possibility of some pump degradation, particularly to the pump seals, could occur, it was concluded that sufficient time would exist for operator action to open the minimum flow valves. It should be noted that the Limiting Conditions for Operation (LCOs) involved relatively short time frames (2 hours, Technical Specification 3.6.1.1; 12 hours, Technical Specification 3.5.3.1).

3. Corrective Action Which Has Been Taken

Appropriate plant Operations personnel have been directed to use formal communication channels when obtaining Engineering evaluations required to support actions associated with operability decisions involving safety-related equipment.

4. Corrective Action Which Will Be Taken

- a) Real time training will be conducted relative to this event. This training will include a discussion of this event as well as generic training associated with the consequences of misaligning minimum flow bypass valves.
- b) The Engineering Evaluation Procedure (ENP-12) will be revised to require consultation with the vendor for evaluations which address modes of equipment operation which have the potential for degrading the equipment.

5. Date for Full Compliance

Full compliance has been achieved relative to this event. The additional corrective actions specified in Item 4 above shall be completed by March 31, 1985.