



AUG 19 1996

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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 DEVIATION

Gentlemen:

On July 19, 1996, the Nuclear Regulatory Commission (NRC) issued a Notice of Deviation for the Brunswick Steam Electric Plant, Units 1 and 2. The bases for the deviation are provided in NRC Inspection Report 50-325/96-08 and 50-324/96-08. Enclosure 1 provides Carolina Power & Light Company's response to the deviation. In addition, Carolina Power & Light Company has identified two additional examples of deviation from commitments. This response also addresses actions taken with regard to these deviations.

Carolina Power & Light Company has determined that this response does not contain information of a proprietary nature. Please refer any questions regarding this submittal to Mr. G. D. Hicks at (910) 457-2163.

Sincerely,

W. Levis
Director-Site Operations

SFT/sft

Enclosures

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

cc: Mr. S. D. Ebner, Regional Administrator, Region II
Mr. D. C. Trimble, Jr., 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 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 and 2 NRC DOCKET NOS. 50-325 & 50-324 OPERATING LICENSE NOS. DPR-71 & DPR-62 REPLY TO A NOTICE OF DEVIATION

During an NRC inspection conducted from May 12 through June 22, 1996, deviations of previous commitments were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (NUREG-1600), the deviations are listed below:

- A. In a letter to the NRC dated July 1, 1993, the licensee submitted its revised schedule for completion of the maintenance procedure backlog with a completion date of July 1995.

Contrary to the above, the licensee did not complete implementation of the maintenance procedure improvements in that approximately 1000 upgraded procedures had not been released for use. These procedures were to be used and validated at the next scheduled use date after July 1995. However, as of July 6, 1996, these upgraded procedures had been placed in a hold file and not released for use.

- B. In reply to NRC Notice of Violation, 325,324/96-04-06 dated May 29, 1996, the licensee submitted a date of June 1, 1996, for completion of a revision to Fire Protection Procedure OFPP-14, that would ensure combustible load evaluation requirements were clearly defined and easily understood.

Contrary to the above, the licensee's Fire Protection Procedure OFPP-14, Control of Combustibles, Transient Fire Loads, and Ignition Sources had not been implemented by June 1, 1996. The procedure was revised May 31, 1996, but was not implemented until July 1, 1996.

RESPONSE TO DEVIATION A:

Reason for Deviation:

The Maintenance Organization did not respond to completion of the commitment in a timely manner due to numerous changes in the Maintenance procedure writing group management organization that occurred since establishing the commitment. The management changes resulted in insufficient level of project oversight and an inconsistent understanding of the commitment. In addition, there were inadequate Maintenance management controls in place to assure successful project completion.

Corrective Steps That Have Been Taken and Results Achieved:

As of August 12, 1996, approximately one-third of the maintenance procedures have been revised consistent with AP-005, Generic Procedure Writers Guide, format requirements and issued for use.

A plan has been established to complete the implementation of the Maintenance Procedure AP-005 Reformat Project.

A project manager for the Maintenance Procedure AP-005 Reformat Project has been assigned with accountability for project completion.

Weekly status reports are being provided to appropriate Maintenance management for tracking and accountability of project progression.

Corrective Steps to Avoid Further Deviations:

Maintenance procedures which have not been updated into the AP-005 format by September 30, 1996, will be administratively on-hold in accordance with the requirements of site procedure BSP-57, Administrative Process For The Identification, Review, And Use Of Maintenance Procedures With Technical Deficiencies.

The Maintenance Procedure AP-005 Reformat Project is scheduled to be completed by September 1, 1997.

Subsequent to issuance of this deviation, the NRC resident inspectors raised a concern regarding observed performance of dual concurrent verification of valve position during surveillance procedure 2MST-CRD21R, CRD Accumulator Leak Detection Channel Functional and Lo Pressure Channel Calibration which called for independent verification. The upgrade of Maintenance procedures to the AP-005 format will clearly state whether the use of dual concurrent verification is appropriate as a means of satisfying verification within individual procedures prior to completion of the AP-005 Reformat Project.

Date When Corrective Action Will Be Complete:

September 1, 1997

RESPONSE TO DEVIATION B:

Reason for Deviation:

Communications between Operations and Regulatory Affairs personnel were not adequate to ensure that intended actions were properly reflected in the commitment. Operations intended to revise OFPP-14 by June 1, 1996, complete training on the approved revision, and implement it by July 1, 1996. Reviews of the commitment prior to its submittal failed to recognize that the plan (approval, training, and implementation) was not correctly reflected in the commitment.

Corrective Steps That Have Been Taken and Results Achieved:

OFPP-14 has been revised and implemented.

Appropriate Operations and Regulatory Affairs personnel have been counseled on the need to ensure that the intent of each commitment is fully reflected in the commitment due date.

A review of commitments established in Licensee Event Reports, Generic Letters and Bulletins, and NRC Inspection Reports issued from January 1, 1993 to July 1, 1996 was performed to ensure that the committed actions established in these documents were fully implemented or, if still open, are being adequately tracked as committed actions in the Corrective Action Program database. This review determined that the commitments established in these documents were satisfied or continue to be tracked as open commitments.

Additional Examples of Deviation From Commitment:

Carolina Power & Light Company has identified two additional deviations from commitments. A brief summary of these examples including the cause for the missed commitments is provided below:

Example 1:

In a letter to the NRC dated December 21, 1995, Carolina Power & Light Company committed to develop and implement a preventive maintenance inspection procedure for the purpose of evaluating the condition of, and repairing as required, the control building access door seals by May 15, 1996. On July 8, 1996, it was determined that the commitment was not completed. Upon discovery of the missed commitment, a Corrective Action Program condition report was generated to identify the cause and corrective actions needed.

Investigation into the cause of this event determined that personnel responsible for development of the control building door seal inspection did not aggressively follow and implement the approved plan for satisfying the commitment. In addition, personnel error resulted in inappropriate closure of the action item generated to track the commitment on the basis of a procedure revision request.

On April 24 and July 8, 1996, visual inspections of the control building door seals were performed by the system engineer. No operability issues were identified during these inspections. On July 24, 1996, procedural controls were implemented that properly satisfied the commitment.

Example 2:

In a letter dated January 19, 1996, Carolina Power & Light Company committed to monthly review of Corrective Action Program (CAP) trend results applicable to engineering products with the site Vice-President and the site Engineering Manager until the engineering stop work was rescinded. On January 22, 1996, an action item was assigned to the CAP Manager to perform the monthly review. On June 21, 1996, the engineering stop work order was rescinded. Three reviews of CAP trend results with the site Vice-President and Engineering Manager had transpired between January 19, 1996 and June 21, 1996. Additionally, a formal review of Engineering performance and trends was conducted with the off-site Nuclear Safety Review Committee during this period.

Investigation into the cause of this event determined that during the first meeting between the CAP Manager and the site Vice-President on February 15, 1996, difficulty was encountered in assessing the data for improved performance due to the limited trending information that is available monthly. Although a total of four reviews were conducted, the individual responsible for implementing the commitment focused on providing management with periodic trend analysis rather than verbatim compliance with the commitment.

Corrective Steps Which Will Be Taken to Avoid Further Deviations:

The Site Vice-President issued a memorandum to plant management to reinforce expectations for the closure of actions and the resolution of problems. These expectations emphasized the need to ensure full implementation of actions prior to closure and stressed that the individual assigned responsibility for an action item is responsible for verifying the intended actions resolved the initial problem.

In addition, the Manager-Regulatory Affairs issued a memorandum to stress the expectation and procedural requirements for completing, reviewing, and closing Corrective Action Program action items. In summary these requirements include the following:

Specified actions must be implemented by the due date. For revisions to procedures this means the procedure change must not only be approved but also have an effective date prior to the action item due date.

Corrective actions and commitments cannot be closed based on requests for work but rather the completion of actual changes or work which corrects the problem or deficiency.

Training is being conducted by site management on the Corrective Action Program expectations and procedural requirements discussed in the Site Vice-President and Manager-Regulatory Affairs memorandums summarized above. This training will be completed by September 30, 1996. As an interim measure, Regulatory Affairs management is providing an additional management level of review for closure of NRC committed action items.

Date When Corrective Action Will Be Complete:

September 30, 1996

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
Maintenance procedures which have not been updated into the AP-005 format by September 30, 1996, will be administratively on-hold in accordance with the requirements of site procedure BSP-57, Administrative Process For The Identification, Review, And Use Of Maintenance Procedures With Technical Deficiencies.	9/30/96
The Maintenance Procedure AP-005 Reformat Project will be completed. This project will clearly state whether the use of dual concurrent verification is appropriate as a means of satisfying verification within individual procedures prior to completion of the AP-005 Reformat Project.	9/1/97
Site-management will conduct training of site personnel on the Corrective Action Program expectations and procedural requirements discussed in the Site Vice-President and Manager-Regulatory Affairs memorandums.	9/30/96