



Carolina Power & Light Company

Brunswick Steam Electric Plant

P. O. Box 10429

Southport, NC 28461-0429

April 19, 1985

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Dr. J. Nelson Grace, Administrator
U.S. Nuclear Regulatory Commission
Suite 2900
101 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 Dr. Grace:

The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/85-04 and 50-324/85-04 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 that violation.

Very truly yours,

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

RMP/shb

Enclosures

cc: NRC Document Control Desk

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Violation

Technical Specification 6.8.1.a requires written procedures to be implemented for items in Appendix A of Regulatory Guide 1.33, November 1972. Item B.3 of Appendix A requires procedures for scram recovery. OI-22 details what reviews must be performed prior to restart after a scram.

Contrary to the above, the licensee failed to implement procedure OI-22 subsequent to a turbine stop valve closure scram on January 24, 1985, in that Attachment 8 to OI-22 was not completed prior to restart as required by step 9.b of OI-22. Attachment 8 verifies proper plant response during eight potential transients. Two of these, condenser vacuum transient and scram setpoint reached, did actually occur.

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

Response

I. Admission or Denial of Alleged Violation

Carolina Power & Light Company acknowledges that OI-22, Plant Incident and Posttrip Investigation, was not properly implemented prior to the reactor startup following a scram on January 24, 1985.

II. Reason for the Violation

Following a review by the Operations Engineer of the emergency operating procedure flowcharts, the computer printouts, the chart recordings, and the OI-22 Attachment 3 (Scram Report), Attachment 1 was completed. At this time, step 9.b, "Were there any safety systems that did not function as required? (Complete Attachment 8) [] Yes [] No," was checked as "No"; however, the engineer failed to denote completion of Attachment 8 by physically checking the appropriate yes/no determination of his review.

As noted in the report, the cognizant engineer indicated that his review had determined that all safety systems had functioned normally; however, he failed to physically denote completion of the attachment prior to unit restart. The Operations Engineer's review indicated that no safety concerns existed following the scram and a restart of the unit was recommended. The Plant Nuclear Safety Committee concurred with this conclusion in their review of the scram prior to the unit's restart.

III. Corrective Actions Taken

The cognizant engineer has been counseled concerning the appropriate sections of OI-22 which must be completed with sign-off prior to a restart of the unit.

IV. Future Corrective Actions

OI-22 is being revised to more clearly delineate those steps and attachments which must be completed prior to a restart of the unit as verbally discussed with the resident inspectors.

V. Date Full Compliance Will Be Achieved

OI-22 will be revised by May 31, 1985.

CP&L would also like to correct an apparent misunderstanding expressed in the inspection report. The second paragraph of page 10 states that the cognizant engineer indicated he would have checked each of the eight transients listed on Attachment 8 as "No." What the engineer was attempting to convey to the inspector was that, following a review of Attachment 8 criteria, step 9.b of Attachment 1 should be checked "No." As noted in Attachment 8 (enclosed), it is expected that one or more items will be checked "Yes" on any scram.