

Carolina Power & Light Company

Brunswick Steam Electric Plant

P.O. Box 10429

Southport, North Carolina 28461

JAN 08 1993

SERIAL: BSEP-92-0056

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

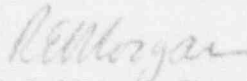
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
REPLY TO NOTICE OF VIOLATION

Gentlemen:

On November 20, 1992, the Nuclear Regulatory Commission issued a Notice of Violation for the Brunswick Steam Electric Plant, Units 1 and 2. Details of the underlying NRC inspections are provided in Inspection Report Nos. 50-325/92-33 and 50-324/92-33 dated November 20, 1992. Carolina Power & Light Company hereby responds to the Notice of Violation. Enclosure 1 to this letter provides CP&L's reply to the Notice of Violation in accordance with the provisions of 10 CFR 2.201. This reply is being submitted before the requested extension date of January 8, 1992, as agreed to on December 21, 1992, with Mr. Robert Carroll of the NRC staff.

Please refer any questions regarding this submittal to Mr. R. C. Godley at (919) 457-2412.

Yours very truly,



R. E. Morgan, Plant Manager Unit 1

GMT/gmt

Enclosures

cc: Mr. S. D. Ebner
Mr. R. H. Lo
Mr. R. L. Prevatte

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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 NOTICE OF VIOLATION

VIOLATION:

During an NRC inspection conducted on October 5-9 and October 19-23, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50, Appendix B, Criterion XVI, requires that conditions adverse to quality such as failures, deficiencies and deviations be promptly identified and corrected.

Contrary to the above, deficiencies identified in Revision 2 of Bechtel Procedure WDP-002, Phase II Walkdowns Procedure for Reactor Building miscellaneous steel and drywell platform steel, by NRC on September 17, were not promptly corrected. The Phase II walkdown inspections were continuing using Revision 2 of procedure WDP-002 as of October 23, 1992. This procedure had not been corrected (revised) and re-issued to correct the deficiencies regarding visual inspection of welds identified by NRC during the inspection conducted September 14-18, 1992, documented in NRC Inspection Report numbers 50-325/92-27 and 50-324-92-27.

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

RESPONSE TO VIOLATION:

Admission or Denial of Violation:

Carolina Power & Light Company admits this violation.

A. Reason for Violation

Walkdown Procedure WDP-002 was specifically developed for conducting Phase II walkdown activities for the Miscellaneous Steel Verification Program (MSVP) at the Brunswick Steam Electric Plant (BSEP). When the concern regarding weld inspection was identified on September 17, 1992, immediate action was initiated to resolve the concern. Discussions were held on the morning of September 18, 1992 with the NRC outlining programs to address the issues. This effort culminated in: (1) the partial penetration weld verification program and (2) the sample inspection program for slag-covered welds. These programs were subsequently reflected and incorporated into Revision 3 of the Phase II Walkdown procedure WDP-002. However, due to the complex nature of the issues

involved, development of sound approaches, internal and external reviews, and approvals required in accordance with the established QA Program, the revision required approximately 5 weeks from first indication of the concern to issuance of the revised procedure.

The use of Bechtel's Procedure Change Notice (PCN) process (i.e., temporary revision) had not been authorized for use with Walkdown procedures and correcting the procedural deficiencies required a formal procedural revision. The PCN would have allowed the immediate initiation of corrective actions for the procedural deficiencies, with prompt implementation.

B. Corrective Actions, Steps Taken, and Results Achieved

Revision 3 of WDP-002 was issued on October 26, 1992, addressing welding concerns raised by the NRC and other pertinent issues. The concern raised with the welding inspection procedure included: 1) verification of partial penetration welds, 2) acceptance of groove welds with up to 5% lack of fusion, and 3) inspection of welds without removing all surface slag. The impact of the concerns on previously completed and in-process walkdowns has been evaluated and is addressed, as follows:

- 1) The program for partial penetration welds required Revision 3 to clearly address inspection of partial penetration welds and the reinspection of all previously inspected welds in accordance with the revised inspection requirements. In addition, reinforcing fillet weld modifications were designed and issued for field installation at each location where existing weld penetration depth cannot be positively verified. The results of the reinspection process and addition of reinforcing fillet welds are combined and included in the program report entitled Partial Penetration Welds.
- 2) The provision for accepting groove welds with 5% lack of fusion, which was added in Revision 2 (September 8, 1992) of the procedure, was removed by Revision 3 (October 26, 1992). The welding engineers involved with the inspections performed during this period time frame (~ seven weeks) were interviewed to determine if any welds were accepted using the 5% lack of fusion provision. All responded that no use was made of this provision (The verbal responses are presently being reaffirmed in writing and are to be completed and on file by January 15, 1993.)
- 3) The program for addressing the acceptability of welds inspected (past, present, and future inspections) without removing all surface slag is based on a sampling test program which tests the viability of the process. The results of the sampling program are contained in the program report entitled: Slag Sampling Program. While the Visual Weld Acceptance Criteria (VWAC)-based sample program could not be confirmed due to the limited amount of slag encountered, the process verified that the presence of limited slag is not a deterrent to the MSVP weld verification process and the determination of weld quality is not compromised.

Revision 3 of WDP-002 includes a requirement that the walkdown packages provide a notation identifying those welds inspected with slag present. Existing packages are being revised to include this notation where applicable. All affected walkdown packages are scheduled to be updated with the appropriate slag notation by January 8, 1993. Identification of the presence of slag on welds that have been inspected is based on the review of photographs.

The above evaluations of potential impacts to completed, and work in-process during the preparation of Revision 3, provides conclusive evidence that the adverse conditions have been adequately addressed.

C. Corrective Actions to Avoid Further Violations

Procedure revision is a controlled process which requires appropriate on- and off-site reviews and approvals, including reviews and approvals by CP&L prior to issuance for use. In order to enhance the timeliness of the walkdown procedure revision process, Bechtel is adding the following additional provisions for cases where deficiencies are identified in walkdown procedures:

1. The use of a Procedure Change Notice (PCN) process will allow the immediate initiation of corrective actions for procedural deficiencies, with prompt implementation. Due to the simplicity of the PCN process, a procedural change can be issued quickly, pending a formal procedure revision. Typically, a PCN can be initiated, approved, and issued for use within five days of determining the appropriate procedural change to resolve the identified deficiency. Presently, other procedures such as Engineering Department Project Instructions (EDPI's) have a PCN process. With the revision completed on January 8, 1993, the PCN process is now applicable to walkdown procedures.

The procedure change process has provisions requiring the subject matter of a PCN be evaluated. Any identified procedural deficiencies will be evaluated as to their impact on work in-process and the appropriate action will be taken to ensure that the final product meets all program requirements. This could involve making the new procedural requirements retroactive for previous work, or if necessary work would be suspended until the appropriate procedural directions are in place.

D. Date of Full Compliance

With the issuance of Revision 3 to the Walkdown Procedure WDP-002 on October 26, 1992, the program is now in compliance with NRC requirements.