



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO GENERIC LETTER 83-28, ITEMS 3.1.2 AND 3.2.1

CAROLINA POWER & LIGHT COMPANY

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2

DOCKET NOS. 50-325 AND 50-324

1.0 Introduction

Subsequent to two failures in the reactor trip system at Salem Nuclear Power Station in February 1983, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 83-28 on July 8, 1983 to all licensees. GL 83-28 required licensees to develop and implement improved programs for post-trip review, classification of equipment, vendor interface, post-maintenance testing, and RTS reliability. The letter also stated that the licensee's programs would be reviewed by NRC and that a Safety Evaluation (SE) would be issued. The licensee, Carolina Power & Light Company (CP&L), for Brunswick Nuclear Plant responded to GL 83-28 on November 7, 1983.

The licensee's responses to Action Items 3.1.1, 3.1.2, 3.2.1, 3.2.2, 4.1 and 4.5.1 were evaluated for compliance to the NRC staff's positions as defined in GL 83-28. An Interim Safety Evaluation was transmitted to the licensee by NRC letter dated July 1, 1985. The NRC letter also requested that the additional information on Action Items 3.1.2, 3.2.1, and 3.2.2 be submitted according to comments in the letter dated November 7, 1983.

The licensee submitted supplemental responses to Action Items 3.1.2 and 3.2.1 in Letter Nos. NLS-85-276 and 309 dated August 28, 1985. The licensee committed to submit a supplemental response to Item 3.2.2 in December 1985. We will review this response when received and will then issue a final SE for Action Item 3.2.2.

This SE presents the evaluation of the licensee's supplemental responses to our request for additional information concerning post-maintenance testing.

2.0 Evaluation

By letters dated August 28, 1985, CP&L provided supplemental information on Action Items 3.1.1 and 3.1.2. We have evaluated the licensee's responses against our request for additional information presented in the July 1, 1985, transmittal of the SE for the Brunswick Nuclear Plants.

Delineated below are the results of the NRC evaluation and a brief summary of the licensee's supplemental responses:

A. Item 3.1.2 - Check of Vendor and Engineering Recommendations for Testing and Maintenance (Reactor Trip System Components)

The licensee committed in its response dated November 7, 1983, to review vendor and engineering recommendations other than General Electric (GE) Service Information Letters (SILs). This review was to ensure that appropriate test guidance was included in the periodic test and maintenance procedures or the Technical Specifications where required. Also, the licensee stated that SILs 308, 360, and 155 would be implemented during the next outage.

The licensee's supplemental response (Letter NLS-85-276) dated August 28, 1985, states that their final review has been completed and they did not identify any vendor or engineering recommendations concerning test guidance which have not been implemented in periodic tests, maintenance instructions, or Technical Specifications, as appropriate. The response also included details of their plant to accomplish the above, a list of instrument inputs to the Reactor Protection System (RPS), and the manufacturers of these instruments. Two engineering recommendations are presently being worked per Engineering Work Requests and their present program should identify any future vendor recommendations. Based on our review, we find that the licensee's supplemental response is acceptable and meets the intent of GL 83-28.

B. Item 3.2.1 - Review of Test and Maintenance Procedures and Technical Specifications (All Other Safety-Related Components)

The licensee committed in its response of November 7, 1983, to review procedures and Technical Specifications to verify that testing of safety-related components is required after maintenance. This testing is to ensure that Safety-Related equipment is capable of performing its safety function prior to being returned to service.

The licensee's supplemental response (Letter NLS-85-309) dated August 28, 1985, stated that the above review has been completed and documented. The licensee's review of procedures and Technical Specifications confirmed that their post-maintenance testing program is being implemented to ensure that the components will perform their safety function prior to being returned to service. Based on our review, we consider the licensee's supplemental response acceptable.

3.0 Conclusion

The licensee's supplemental responses to GL 83-28 Action Items 3.1.2 and 3.2.1 stated the following:

Applicable vendor and engineering test guidance has been reviewed and incorporated into test and maintenance procedures.

Review of procedures and Technical Specifications confirmed that testing is required after maintenance to assure that the components will function prior to being returned to service

Based on review of the information submitted by the licensee in their supplemental responses dated August 28, 1985, we conclude that the licensee's actions on GL 83-28 Action Items 3.1.1 and 3.2.1 are acceptable and meet the intent of GL 83-28.

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Dated: October 23, 1985