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SERIAL: BSEP 97-0252
10 CFR 2.201

JUN 11 1997

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

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

Gentlemen:

On May 12, 1997, the NRC issued a Notice of Violation (NOV) to the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. The NOV contained two specific violations, the bases for which are delineated in NRC Inspection Report Nos. 50-325/97-05 and 50-324/97-05.

Carolina Power & Light (CP&L) Company admits the violations occurred as described in the Inspection Report. Enclosure 1 provides the respective responses to the violations in accordance with the provisions of 10 CFR 2.201; Enclosure 2 delineates regulatory commitments contained within the responses.

CP&L finds the Inspection Report does not contain information of a proprietary nature. Please refer any questions regarding this submittal to Mr. Keith Jury, Manager - Regulatory Affairs, at (910) 457-2783.

Sincerely,

C. S. Hinnant

SFT/sft

Enclosures:

1. Reply to Notice of Violation
2. List of Regulatory Commitments



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PDR ADOCK 05000324
Q PDR

pc (with enclosures):

U. S. Nuclear Regulatory Commission, Region II
ATTN.: Mr. Luis A. Reyes, Regional Administrator
Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303

U. S. Nuclear Regulatory Commission
ATTN: Mr. C. A. Patterson, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461

U. S. Nuclear Regulatory Commission
ATTN.: Mr. David C. Trimble, Jr. (Mail Stop OWFN 14H22)
11555 Rockville Pike
Rockville, MD 20852-2738

The Honorable J. A. Sanford
Chairman - North Carolina Utilities Commission
P.O. Box 29510
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ENCLOSURE 1

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

VIOLATIONS:

During an NRC inspection conducted from March 2 through April 12, 1997, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

VIOLATION A:

Technical Specification (TS) 6.8.1.c requires that written procedures shall be established, implemented, and maintained covering TS surveillance test activities of safety related equipment.

TS 4.5.3.1.c.2 required the performance of an instrument channel calibration and verification that the setpoint was 5 ± 1.5 pounds per square inch difference (psid) greater than normal.

Contrary to the above, on the December 12, 1996, and February 26, 1997, performances of maintenance surveillance test procedure 1MST-CS21Q, CS Sparger High dP Chan Cal, the licensee failed to verify that the Core Spray Sparger Break Detector alarm setpoint of 31 ± 7 inches of water was set 5 ± 1.5 psid greater than the indicated normal differential pressure of -154 inches of water as required per TS 4.5.3.1.c.2. A normal value was stated in the procedure, but the actual plant normal value had changed.

This is a Severity Level IV Violation (Supplement I). This is applicable to Unit 1.

RESPONSE TO VIOLATION A:

Admission or Denial of Violation:

Carolina Power & Light Company admits the violation.

Reason for Violation:

There is no evidence that CP&L has programmatically verified the normal indication on the Core Spray (CS) system line break instrumentation in compliance with the requirements of Technical Specification 4.5.3.1.c.2 since initial plant start up. This lack of a programmatic verification was caused by the failure to establish adequate procedural controls for this activity. Investigation into this event determined that between December 31, 1979 and March 26, 1982, verification of the normal operating delta pressure value for the CS line break instruments was required to be recorded weekly in accordance with Operating Instruction OI-03, Periodic Testing and Daily Surveillance Report. However, OI-03 did not provide clear instruction regarding the

actions required in the event a significant change in the normal operating delta pressure value was detected. In addition, on March 26, 1982, the requirement to verify the normal operating delta pressure value as specified in OI-03 was inappropriately deleted. As a result of this deletion, no verification was performed per Technical Specification 4.5.3.1.c.2 to ensure that the CS system line break alarm setpoint was 5 ± 1.5 psid greater than the normal operating delta pressure value from March 1982 until May 1997.

Corrective Actions Which Have Been Taken and Results Achieved:

Upon finding an abnormal CS system line break instrument indication on March 9, 1997, engineering evaluation ESR 97-00181 was generated to document the review of and revise the setpoint for the 1-5.21-PDS-N004A CS system line break instrument. The other loops of the Unit 1 and 2 CS systems were found acceptable and required no setpoint adjustment. The new setpoint calibration was performed on March 14, 1997, in accordance with 1MST-CS21Q.

OOI-3.3, Daily Surveillance Procedure, has been revised to require a weekly verification that the actual normal operating delta pressure value is within acceptable limits.

The current procedure development and change processes have sufficient controls to preclude similar concerns in the future.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

A review of the Technical Specifications will be performed to determine if similar requirements involving the verification of instrument setpoints based on normal operating parameters exist and are being properly implemented and procedurally controlled.

Date When Full Compliance Will Be Achieved:

Full compliance with the requirements of Technical Specification 6.8.1.c has been achieved.

VIOLATION B:

10 CFR 50, Appendix B., Criterion XVI, Corrective Action, requires that measures shall be established to assure that conditions adverse to quality such as deficiencies, deviations, and nonconformances are promptly identified and corrected.

Plant Program Procedures 0PLP-04, Corrective Action Management, implements these requirements. This procedure requires that Condition Reports (CR) be written upon identification of an adverse condition and prompt notification to the Operations Shift Superintendent of a potential operability or reportable event.

Contrary to the above, on March 11, 1997, upon identification of an adverse condition, a CR was not generated and investigative actions assigned as required by 0PLP-04. CR 97-1277 was not written until March 31, 1997, and a four-hour report was made to the NRC in accordance with 10 CFR 50.72(b)(2)(iii)(D).

This is a Severity Level IV violation (Supplement I). This is applicable to both Units.

RESPONSE TO VIOLATION B:

Admission or Denial of Violation:

Carolina Power & Light Company admits the violation.

Reason for Violation:

The root cause for this error was a lack of appreciation, within the corporate Nuclear Fuels Management and Safety Analysis (NFM&SA) Section, for the need to promptly report adverse conditions. The NFM&SA Section coordinated CP&L's response to the adverse condition involving an inconsistency between the Rod Withdrawal Error analysis assumptions, developed by the reactor fuel vendor (i.e., General Electric Company), for the previous operating cycle and Technical Specification operability requirements for the Rod Block Monitor system. The NFM&SA Section identified that a CR should be written on the identified condition, but did not do so in a timely manner. When the CR was generated a four-hour report was made to the NRC in accordance with 10 CFR 50.72(b)(2)(iii)(D). Upon further evaluation the four hour report was retracted.

Corrective Actions Which Have Been Taken and Results Achieved:

The BSEP support staff of the NFM&SA Section has received training on management expectations and procedural requirements for prompt reporting of adverse conditions. The remainder of the NFM&SA Section also received this training to avoid similar occurrences at the other CP&L nuclear sites.

The Engineering Support Personnel continuing training program lesson plan for the second quarter of 1997 emphasizes the importance of effective use of the Corrective Action Program, including CR initiation threshold, timeliness of CR initiation, and corrective action effectiveness/timeliness. In addition, this training stresses the importance of documenting and communicating, in a timely manner, the results of evaluations which could impact event reportability. The appropriate NFM&SA Section and site engineering personnel will be trained by July 31, 1997.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

No actions in addition to those discussed above are needed to avoid further violations

Date When Full Compliance Will Be Achieved:

Full compliance with the requirements of 10 CFR 50, Appendix B Criterion XVI has been achieved.

ENCLOSURE 2

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

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Carolina Power & Light (CP&L) Company in this document. Any other actions discussed in the submittal represent intended or planned actions by CP&L. They are described to NRC for the NRC's information and are not regulatory commitments. Please notify the Manager - Regulatory of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage
A review of the Technical Specifications will be performed to determine if similar requirements involving the verification of instrument setpoints based on normal operating parameters exist and are being properly implemented and procedurally controlled.	7/15/97
Appropriate NFM&SA Section and site engineering personnel will be trained on the importance of effective use of the Corrective Action Program, including CR initiation threshold, timeliness of CR initiation, and corrective action effectiveness/timeliness.	7/31/97