

CP&L

Carolina Power & Light Company
Brunswick Nuclear Project
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ATTN: Document Control Desk
Washington, D. C. 20555

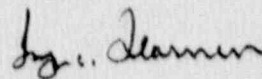
BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

The Brunswick Steam Electric Plant (BSEP) has received NRC Inspection Report 50-325/90-14 and 50-324/90-14 and finds that it does not contain information of a proprietary nature.

This report included a NOTICE OF VIOLATION. Enclosed is Carolina Power & Light Company's response to that NOTICE OF VIOLATION.

Very truly yours,



J. L. Harness, General Manager
Brunswick Nuclear Project

TH/

Enclosure

cc: Mr. S. D. Ebnetter
Mr. N. B. Le
BSEP NRC Resident Office

bcc: Mr. R. M. Coats Mr. L. I. Loflin Mr. D. C. Whitehead
Mr. C. W. Crawford Mr. A. M. Lucas INPO
Mr. A. B. Cutter Mr. R. E. Morgan Onsite Licensing
Mr. W. J. Dorman Mr. J. O'Sullivan File: BC/A-4
Ms. R. S. Gatewood Mr. W. W. Simpson SHEEC Training
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I. NOTICE OF VIOLATION

10CFR50.49(d) requires that the licensee maintain a list of equipment important to safety required to be environmentally qualified and provide information in an auditable form which demonstrates that the equipment will perform its function under its design harsh environmental conditions.

Qualification Data Package (QDP)-71, Revision 0, establishes the qualification of General Electric CR151D terminal blocks for use in the Reactor Building. The file requires that the terminal block be installed in a NEMA 3 or better enclosure so that the device is protected from the direct effects of steam and water impingement.

Contrary to the above, a General Electric CR151D terminal block installed in junction box ESS-PN2 on instrument rack H21-P022 in Unit 1 was installed in a configuration not supported by existing documentation due to its junction box cover being open. This condition existed from approximately April 10, 1990 until April 12, 1990 and resulted in 1-B32-PS-N018B and 1-CAC-PT-1257-2B (instruments which are terminated on this block) being inoperable for the above time period.

II. Reply to a Notice of ViolationA. Admission or Denial of Violation

CP&L admits that it violated provisions of QDP-71 by not reinstalling the junction box cover on box ESS-PN2, instrument rack H21-P022, following completion of required testing.

B. Reason for Violation

Investigation into this incident has revealed that the junction box cover was initially removed on April 10, 1990, in order to perform Unit 1 Maintenance Surveillance Test (MST)-RHR27M. Following completion of the MST, the cover was not closed and fastened.

The cause for this event has been determined to be personnel error by the technicians performing the MST. The individuals performing the MST failed to fulfill their responsibility of ensuring the equipment had been properly returned to service. Significantly contributing to this event was an inadequate procedure. The procedure states to install and remove the Voltage-Ohm meter from the terminals, but does not address the box cover. Had the procedure contained a step in the procedure to close the box, this event probably would not have occurred.

C. Corrective Steps Which Have Been Taken and Results Achieved

The box cover was closed following notification of this discrepancy. Technicians verified other box covers on instrument racks in the -17' elevation of the reactor building to be properly installed.

NCR S-90-027 was initiated to identify the root cause of this incident. A Human Performance Evaluation (HPE) was initiated to ensure proper corrective actions would be initiated to avoid recurrence.

Upon reinstallation of the junction box cover, conformance to QDP-71 requirements was restored.

D. Corrective Actions to be Taken to Avoid Further Violations and Date of Full Compliance

The response to NCR S-90-027 identified the following actions to prevent recurrence:

1. Counseling of the involved and instructed as to their responsibility of craftsmanship as described in Maintenance Procedure (MMM)-001.
2. NCR S-90-027 will be reviewed in the Maintenance Second Quarter Real Time Training Program. This action is to be completed by 8-1-90.
3. Procedures 1MST-RHR27M and 2MST-RHR27M have been revised to eliminate the necessity of accessing the terminal box during the MSTs by using Control Room indications.

CP&L feels that compliance relative to this event was achieved following completion of the junction box cover reinstallation and follow-up checks of other box covers in the affected area. Additional actions, as noted above, are considered necessary to prevent recurrence of this type event. Expected completion dates for each of these actions is as noted.