

**CP&L**

USNRC REGION  
ATLANTA, GEORGIA

Carolina Power & Light Company

Brunswick Steam Electric Plant

P. O. Box 10429

Southport, NC 28461

Company Correspondence

July 1, 1981

FILE: B09-13514

SERIAL: BSEP/81-1291

Mr. James P. O'Reilly, Director  
U. S. Nuclear Regulatory Commission  
Region II, Suite 3100  
101 Marietta Street N.W.  
Atlanta, GA 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 & 2  
LICENSE NOS. DPR-71 AND DPR-62  
DOCKET NOS. 50-325 AND 50-324  
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 50-324/81-09 and 50-325/81-09 and finds that it does not contain any information of a proprietary nature.

The report identified four item that appear to be in noncompliance with NRC requirements. These item and Carolina Power & Light Company's response to each are addressed in the following text:

Violation A (Severity Level V)

Appendix B Technical Specification 4.2.3 (Surface Water Sampling) requires, in part, that automatic intermittent water samplers collect monthly samples from the intake and discharge canals.

Contrary to the above, as of April 24, 1981, automatic intermittent surface water sampling of the intake canal (Sampling Station 48) had never been implemented.

Carolina Power & Light Company's Response:

Carolina Power & Light Company acknowledges that this is a violation of Technical Specification, Appendix B, automatic sampling requirements; however, a manual sampling program had been implemented as allowed by the technical specifications. This event was created by a design error which installed incorrectly sized power cables to supply power to Sample Station 48. These cables caused a voltage drop such that the voltage available at the sample station was insufficient to assure proper operation.

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To correct this problem, a plant modification has been written to replace this cable and to ensure that the station is operating properly. Rush purchase orders have been issued to obtain the required components and the completion of the plant modification will be expedited upon receipt of these components. This modification will be completed and Sample Station 48 will be fully operable by November 1, 1981. Until that time, weekly grab samples of the intake canal will continue to be taken and analyzed as in the past.

#### Violation B (Severity Level V)

Appendix B Technical Specification 5.3 requires, in part, development of quality assurance procedures for monitoring, sample collection, and sample analysis.

Contrary to the above, the licensee failed to develop written quality assurance procedures for periodic calibration of dry gas meters associated with air particulate monitors located at the designated monitoring stations listed in Appendix B Technical Specification 4.2, Table 4.2-1.

#### Carolina Power & Light Company's Response:

Carolina Power & Light Company acknowledges that this is a violation of Technical Specification, Appendix B, procedure control requirements. A procedure did exist which contained a section for calibration of the dry gas meters; however, upon a thorough review, it was determined that this procedure did not fully satisfy the requirements for a calibration procedure. A formal calibration procedure is currently being written and will be completed, approved and in use by August 31, 1981.

#### Violation C (Severity Level V)

Appendix B Technical Specification 4.2 states that any location from which milk samples can no longer be obtained may be dropped from the surveillance program. The subject specification requires that the NRC will be notified in writing within thirty days with an explanation of why milk can no longer be obtained from that location.

Contrary to the above, the licensee failed to meet the thirty-day notification requirement following disclosure that weekly milk samples could no longer be obtained from Sampling Station 36 (Lewis farm) during routine sampling on March 9, 1981.

#### Carolina Power & Light Company's Response

Carolina Power & Light Company acknowledges that this is a violation of Technical Specification, Appendix B, reporting requirements. This required report was not submitted due to a communications breakdown between the plant site Regulatory Compliance group and the Corporate Regulatory Compliance group whereby the corporate group did not realize that a special thirty-day report was required in addition to the license change request. The required notification was submitted on April 29, 1981.

Mr. James P. O'Reilly

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To prevent a future occurrence of this nature, the plant Regulatory Compliance group has been tasked with the responsibility to assure these reports are made. The plant group has recently been reorganized and its staff increased which will allow it to properly manage this function. Full compliance has been met on this item.

Violation D (Severity Level V)

Appendix B Environmental Technical Specification 5.3 requires that temporary changes to procedures which do not change the intent of the original procedure may be made, provided such changes are approved by two members of the management staff. Such changes will be documented, and subsequently reviewed by the Plant Nuclear Safety Committee and approved by the plant General Manager prior to implementation as permanent procedure changes.

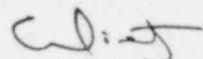
Contrary to the above, as of April 24, 1981, the licensee failed to meet the approval requirements for temporary changes made to procedures RC-ER-12 (Determination of Gross Alpha and Beta in Water) and RC-ER-18 (Quality Control for Beta-Gamma Coincidence System).

Carolina Power & Light Company's Response:

Carolina Power & Light Company acknowledges that this is a violation of Technical Specification, Appendix B, procedure revising requirements. This event was caused by a personnel error, in that appropriate approval for temporary changes was not obtained, and these unapproved temporary changes were never presented for the required permanent change approval. These revised procedures are maintained for use at the Harris Energy & Environmental Center (HEEC) and not at the plant site.

Personnel involved in this event have been counseled on the requirements and necessity of following procedure revision instructions to assure an adequate independent review is performed for public and plant safety. All procedures maintained at the HEEC are being reviewed to assure that no other procedure revision problems exist. This review and any required corrections will be completed by October 31, 1981.

Very truly yours,



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

RMP/jro

cc: Mr. R. A. Hartfield  
Mr. V. Stello, Jr.