



Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

AUG 11 1983

SERIAL: LAP-83-360

E. E. UTLEY  
Executive Vice President  
Power Supply and Engineering & Construction

Mr. James P. O'Reilly, Regional Administrator  
United States Nuclear Regulatory Commission  
Suite 2900  
101 Marietta Street, NW  
Atlanta, GA 30303

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

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant ("SEP") has received IE Inspection Report 324/83-17 and 325/83-17 and has found that it does not contain any information of a proprietary nature.

The report identified one item that appears to be in noncompliance with NRC requirements. This item and Carolina Power & Light Company's (CP&L) response are addressed in the following text.

A. Violation (Severity Level III)

Environmental Technical Specification, Appendix B, paragraph 2.5.2.e requires that if the augmented off-gas is out of service and the air ejector off-gas monitors are inoperative, a reactor shutdown be initiated so that the reactor will be in the hot shutdown condition within 24 hours.

Contrary to the above, during the period from 11:00 p.m., May 8, 1983, to 4:00 a.m., May 10, 1983, with the Unit 2 augmented off-gas system out of service and the air ejector off-gas monitors inoperative, a reactor shutdown was not initiated and the reactor was not in hot shutdown within 24 hours, although, sufficient information existed to alert the operator to the conditions existing which required the reactor shutdown.

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B. Carolina Power & Light Company's Response

1. Denial or Admission of the Violation

CP&L acknowledges that a violation did exist.

2. Reason for the Violation

The root cause of this event was the failure to properly restore valves 2-OG-V35 and 2-OG-V36 to service during a partial restoration of the clearance on April 17, 1983. A contributory cause to the event's duration was the failure of the shift operating crews to identify the isolation of the steam jet air ejector (SJAE) monitors.

Additional details relevant to this occurrence are provided in the Special Report dated May 23, 1983 (C. R. Dietz to Mr. J. P. O'Reilly, Serial: BSEP/83-1618); supplement to the Special Report dated May 29, 1983 (C. R. Dietz to Mr. J. P. O'Reilly, Serial: BSEP/83-1716); and the letter dated June 28, 1983 (E. E. Utley to Mr. J. P. O'Reilly, Serial: LAP 83-249) concerning steam jet air ejector radiation monitor operability.

3. Corrective Action Taken

- a. On-shift Operations personnel, excluding Radwaste and Fire Protection, were immediately counseled as to the importance of properly positioning valves and the importance of strict adherence to the clearance procedure and the tag sheets associated with that procedure. This was accomplished by the on-shift training program. In addition to the review of clearances 2-506 and 2-506A, a review of clearances issued during the recent Unit No. 2 outage (April 10, 1983 through May 8, 1983) was completed with no other discrepancies identified.
- b. Specific requirements for review of annunciator status have been established which requires updating each shift. Immediate actions were taken which substantially reduced the number of actuated annunciators on the control panels.
- c. On-shift Operations personnel, excluding Radwaste and Fire Protection, have been counseled about awareness of indications available and the necessity to review and initial charts on each shift.

- d. Individual counseling discussions have been held with appropriate Operations personnel by the Manager - Operations on discipline of Operations. These Operations personnel included the Control Operators, Auxiliary Operators, and appropriate Radwaste Operations and Fire Protection personnel. The potential for improper priorities being placed by Operations personnel during plant evolutions such that proper attention may not be given to each event has been reviewed. The emphasis of these discussions was to enforce that there is always time to respond appropriately to plant conditions.
- e. To ensure operators' awareness of annunciators, the Control Operators' checksheet has been revised to incorporate the requirements established for the review and update of the actuated annunciator status each shift in Operational Conditions 1 and 2.
- f. As a result of the investigation, one Control Operator was removed from licensed duties with loss of license pay for 15 days. Other Operations personnel considered directly involved with this incident--approximately ten Shift Operating Supervisors, Shift Foremen, and Control Operators--were given verbal reprimands concerning this event. Additionally, the Vice President - Brunswick Nuclear Project has met with the Plant General Manager, Manager - Plant Operations, Manager - Operations, Superintendent - Operations, each Shift Operating Supervisor, and each Shift Foreman. During these discussions, the Vice President - Brunswick Nuclear Project emphasized the need for disciplined operations, regulatory sensitivity, and procedural compliance. He further emphasized the obligation and responsibility of shift discipline to each Shift Foreman and placed strong emphasis on the policy that safe plant operation must always take precedence over generation.

4. Actions to be Taken

- a. A review of the clearance procedure will be made to provide for improved auditability of the procedure. This action is scheduled to be completed by August 31, 1983.
- b. A review will be made and additional controls implemented in an effort to assure that critical data is appropriately trended during major plant evolutions. This action will be complete by August 31, 1983.

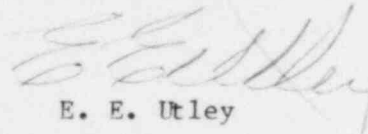
Mr. James P. O'Reilly

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5. Date for Full Compliance

Full compliance has been achieved concerning this occurrence.

Yours very truly,



E. E. Utley

RMP/pgp (7590WRM)

cc: Mr. R. C. DeYoung  
NRC Document Control Desk  
Mr. D. O. Myers (NRC-BSEP)  
Mr. J. P. O'Reilly (NRC-RII)  
Mr. S. D. MacKay (NRC)