



Carolina Power & Light Company

Brunswick Steam Electric Plant  
P. O. Box 10429  
Southport, NC 28461-0429

March 31, 1982

FILE: B09-13510  
SERIAL: BSEP/82-629

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 50-324/82-03 and 50-325/82-03 and finds 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 response are addressed in the following text:

Violation (Severity Level V):

Technical Specification 6.11 states that written procedures shall be prepared consistent with the requirements of 10CFR20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Contrary to the above, procedures involving personnel radiation exposure were not adhered to in that:

1. On January 19, 1982, an individual was issued a respirator without documentation in his exposure file indicating that he had received practical training in the wearing of a respirator as required by procedure E&RC-0220, paragraph 8.3.2.

March 31, 1982

2. During January, 1982, five individuals entered the Unit No. 2 drywell while the reactor was critical and did not have a specific RWP for their drywell entry as required by paragraph 8 of procedure E&RC-0261. These individuals were signed in on a seven-day standing RWP for routing inspections and operations.

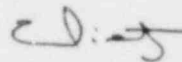
Carolina Power & Light Company's Response:

Carolina Power & Light Company acknowledges that the two examples of the identified violation violates NRC requirements.

An investigation into the first event determined that the Radiation Control technicians responsible for administering the respirator training failed to make the required entry in the individuals exposure file on December 4, 1981, when the individual received his personal qualification card showing that he had received the required training. This personal qualification card is used by Radiation Control personnel responsible for issuing respiratory equipment to verify that the person receiving the respirator is qualified. When the discrepancy was noted in the individuals exposure file, the individual was given another respirator booth test and appropriate entries in the exposure file were made. Radiation Control personnel responsible for administering respirator qualification training have been instructed to update each individual's exposure file concurrent with the issuance of the individual's qualification card. Compliance with this item is considered complete.

An investigation of the second event determined that the Operations personnel involved failed to recognize that their standard seven-day RWP for inspection and operation was not adequate for entry into the drywell while at power. To prevent a similar problem in the future, copies of procedure E&RC-0261, Drywell Entry, and E&RC-0230, Issue and Use of Radiation Work Permits, have been forwarded to the Manager - Operations for incorporation into Operations training. Additionally, personnel from the Environmental and Radiation Control Subunit will meet with Operations management personnel to discuss the use of the seven-day inspection and operation RWP and when a job-specific RWP is applicable. These actions will be completed by May 15, 1982.

Very truly yours,



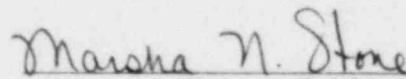
C. R. Dietz, General Manager  
Brunswick Steam Electric Plant

RMP/mcg

C. R. Dietz, having been duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

My commission expires:

3-22-87

  
Notary Public

cc: Mr. V. Stello, Jr.