

CP&L NRC REGION II
Carolina Power & Light Company, ATLANTA, GEORGIA

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Mr. James P. O'Reilly, Regional Administrator
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 3100
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

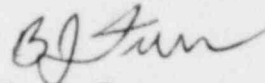
Dear Mr. O'Reilly:

Carolina Power & Light Company (CP&L) has received I.E. Inspection Report 50-324/82-08 and 50-325/82-08 for the Brunswick Steam Electric Plant Unit Nos. 1 and 2, 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 and one item that appears to deviate from commitments made to the NRC. These items and CP&L's response to each are addressed in the attachments to this letter.

Should you have any questions concerning this letter or the enclosures, please contact my staff.

Yours very truly,



B. J. Furr
Vice President
Nuclear Operations

MSG/lr (n-50)
Enclosures

cc: Mr. J. Van Vliet (NRC)

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
IE INSPECTION REPORT 50-324/82-08 AND 50-325/82-08
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

As a result of the NRC inspection conducted on February 15 - March 15, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754, (October 7, 1980), the following violations were identified at Carolina Power & Light Company's (CP&L) Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2.

Violation (Severity Level IV)

10CFR50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. The accepted QA Program, FSAR Section 13.4.3.R.3, states that measures shall be established to follow up on corrective actions to assure proper implementation.

Contrary to the above, the followup of corrective actions to assure proper implementation to preclude recurrence was not done in that:

1. CP&L's response to a violation noted in Inspection Report 81-20, stated that prior to discharging the Floor Drain Sample Tanks (FDST's), Waste Sample Tanks (WST's) and Detergent Drain Tanks (DDT's), two independent lineup verifications on the radwaste control panel would be made. On March 6, 1982, the inspectors determined that two independent lineup verifications were not being made, therefore, implementation of corrective action was not made.
2. CP&L's response to a violation noted in Inspection Report 81-20, committed to implementing a tracking system in which temporary revisions to procedures are properly reviewed in the required time frame. During the inspector's review of CP&L's response, the licensee identified a revision taking 22 days for proper review after the tracking system was implemented, therefore, action to preclude recurrence was not implemented.

Carolina Power & Light Company's Response

Carolina Power & Light Company acknowledges that these two events were violations of NRC requirements. The first event occurred due to a misunderstanding of the original commitment and an administrative error. The second event was caused by the lack of a formal procedure for the proper handling of temporary procedures.

Following the commitment to perform a double verification of tank lineups prior to a release, the release procedure was revised to require a double verification of the lineup from the control panel. This was interpreted by the operators as requiring a double verification that the correct pump and the correct tank discharge valve were selected. These were being checked; however, other valves on the control panel which indicate if tanks are cross-connected were not being checked. Also, the detergent drain tanks were not included due to an administrative error which failed to identify the required checks. To correct this, radwaste operators have been instructed to perform a complete valve lineup second verification prior to all releases. Also, the procedure will be revised by May 30, 1982, to require a complete double verification on all valves on the control panel which affect the tank being released.

The second event occurred due to the lack of a formal procedure which would provide a method to assure all temporary changes were approved as required. A procedure is being written to formally identify the process by which all temporary procedures must be processed to assure approval within the required time frame. This procedure will be in use by May 30, 1982.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
IE INSPECTION REPORT 50-324/82-08 AND 50-325/82-08
RESPONSE TO DEVIATION FROM COMMITMENT

Based on the results of the NRC inspection conducted on February 15 - March 15, 1982 certain activities appeared to deviate from commitments to the Commission as indicated below:

Commitment

In response to NUREG-0737, Clarification of TMI Action Plan Requirements, CP&L stated in letters of November 5, 1980 and December 15, 1980 to the NRC that, regarding item I.A.1.3, their procedures are in conformance with Darrell G. Eisenhower's letter of July 31, 1980, which requires at least one licensed Senior Reactor Operator in the control room at all times, other than cold shutdown.

Deviation

Contrary to the above, on February 24, 1982 inspectors observed that the licensee's administrative procedures do not specifically require a Senior Reactor Operator to be in the control room at all times, other than cold shutdown.

Carolina Power & Light Company's Response

Carolina Power & Light Company acknowledges that Brunswick administrative procedures did not specifically require an SRO to be in the Control Room at all times; however, it should be noted that the operating practice at the Brunswick site should have resulted in an SRO in the Control Room at all times. Appropriate administrative procedures have now been revised to require an SRO in the Control Room at all times when there is fuel in at least one reactor.