



Carolina Power & Light Company

USNRC REGION II
ATLANTA, GEORGIA

83 SEP 27 09:20

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

September 23, 1983

FILE: B09-13510C
SERIAL: BSEP/83-3167

Mr. James P. O'Reilly, Administrator
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
DOCKET NO. 50-325 AND 50-324
LICENSE NO. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 324/83-23 and 325/83-23 and finds that it does not contain any information of 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 provided in the following text:

Violation

10CFR71.12 states conditions under which a general license for shipment in DOT specification containers is issued. One condition requires the person who uses a package pursuant to a general license to comply with the terms and conditions of the NRC Certificate of Compliance as it relates to the shipment package. The NRC Certificate of Compliance No. 5805, Revision No. 10 for CNS-3-55 shipping cask requires that, prior to delivery of the package to a carrier for transport, the package containment cavity shall be leak tested.

Contrary to the above, on March 31, 1983, the licensee made a large quantity shipment (shipment No. 83-166) in a CNS-3-55 shipping cask that had not been leak tested prior to delivery of the package to a carrier for transport.

This is a Severity Level IV violation (Supplement V).

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CP&L Response

A. Admission or Denial of the Violation

CP&L acknowledges that a violation of NRC requirements did occur.

B. Reason for the Violation

This violation resulted from the failure by CP&L to identify the additional requirement for the leak test which resulted from Revision No. 10 to the Certificate of Compliance No. 5805. Since the revised requirement was not identified, the required revisions to the plant special handling procedure were not implemented.

C. Corrective Actions That Have Been Taken

CP&L Special Procedure SP-82-56 was the procedure which was used for handling, loading, and unloading of the CNS-3-55 cask. This procedure was issued as valid for only a temporary period of time since the use of this cask is not routine. As the authorized time for use of this procedure expired on June 30, 1983, no action is necessary for correction of this procedure to require the leak test.

The certificates of compliance (for casks of which Brunswick is a licensed user) have been verified to be the latest revision.

Shipping personnel at Brunswick have received training on the requirements to ensure compliance with certificates of compliance on shipping casks.

The shippers' checklist form has been updated to include a requirement to review the certificate of compliance for the purpose of ensuring all requirements are met.

D. Corrective Actions to be Taken

A procedure will be implemented by November 30, 1983, to ensure revisions to certificates of compliance will be identified and appropriate procedure changes implemented.

E. Date for Full Compliance

Full compliance relative to this event will be achieved with the implementation of the procedure referenced in Section D (November 30, 1983).

Your transmittal letter relative to the subject inspection report requested additional information relative to Brunswick guidelines on LSA shipments (Item 8.e, page 4). The following information is provided:

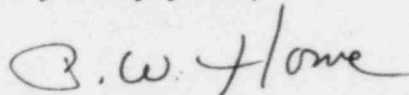
Mr. J. P. O'Reilly

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Brunswick has taken the following steps to improve packaging and inspections methods prior to shipment of strong, tight containers to improve documented compliance with requirements for LSA shipments.

- A. Retraining of E&RC shipping personnel has been performed relative to potential problems to avoid in selection of packages for type A quantity LSA shipments.
- B. Future shipments of HEPA filter units will be enclosed in crates or otherwise securely contained.
- C. Responsible E&RC supervisory personnel are currently inspecting radioactive shipments prior to release.
- D. Radioactive material shipping procedure E&RC-0510 was revised July 22, 1983, and is now undergoing another revision to reflect recent DOT and NRC regulatory changes for shipments. These revisions reflect additional LSA packaging requirements and provide additional guidance for a shipper of LSA radioactive material in a strong, tight package to assure regulatory compliance.

Very truly yours,



P. W. Howe, Vice President
Brunswick Nuclear Project

TEC/pms/LETPS1

cc: Mr. R. C. DeYoung
NRC Document Control Desk