



Carolina Power & Light Company

Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461-0429
February 7, 1984

FILE: B09-13510C
SERIAL: BSEP/84-0257

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 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 (BSEP) has received IE Inspection Report 324/83-41 and 325/83-41 and finds that it does not contain any information of a proprietary nature.

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

Violation A (Severity Level V)

Technical Specification 6.8.1.a requires written procedures be implemented for activities referenced in Appendix A of Regulatory Guide 1.33, November 1972. The guide item, H.2.b.30, references procedures for process radiation monitoring calibration.

Contrary to the above, the steam jet air ejector radiation monitor calibration was not implemented, in that Step VII.B of procedure PT-70 was not correctly performed.

I. Admission or Denial of Violation:

Carolina Power & Light Company acknowledges that on November 29, 1983, Step VII.B of PT-70, SJAE Off-Gas Radiation Monitor Channel Calibration, was improperly signed off as completed.

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II. Reason for Violation:

The technician directly involved did not follow the procedure as it was written and failed to seek guidance or help from a knowledgeable source when questions arose as to its completion. Both of these actions were in direct violation of training given the technician by his foreman, supervisor, and manager--pertaining to reading, understanding, and ensuring the intent of the procedure is known prior to performance and/or verification.

III. Corrective Steps Taken and Results Achieved:

As a result of this incident, the following corrective actions were taken:

1. The technician involved was given specific counseling by his foreman on December 13, 1983, as to his involvement in the incident and what action he should have taken to complete Step VII.B correctly.
2. The technician involved received disciplinary action in accordance with Company Policy for failure to comply with written instruction and/or procedures.
3. A memorandum was placed in the technician's personnel file stating any future failure to comply with written instructions and/or procedures would result in additional, more severe disciplinary action.
4. The technician involved understands his responsibility in this incident and has committed to ensure that no further violations occur.
5. The calibration setpoint was verified to be correct.
6. PT-70 was revised to make Step VII.B very specific as to the actions to be taken and where setpoints could and should be obtained.

IV. Corrective Steps to be Taken:

As a result of this event, I&C Maintenance Supervisors will review this violation with Maintenance personnel in an effort to avoid future violations of this nature.

V. Date When Full Compliance Will be Achieved:

The review with Maintenance personnel should be complete by March 3, 1984.

Violation B (Severity Level V)

Technical Specification 6.8.1.a requires written procedures be established for activities referenced in Appendix A of Regulatory Guide 1.33, November 1972. The guide item, B.9, referenced procedures for shutdown.

Contrary to the above, GP-01, which is used for shutdown, was inadequately established, in that a precaution was not provided to verify that the IRMs are not tripped prior to changing the mode switch from "Run" to "Startup" mode.

I. Admission or Denial of Violation:

Carolina Power & Light Company acknowledges that GP-01 was inadequate in that a precaution was not included to reference inoperable IRMs. CP&L identified this inadequacy during its incident review following the scram.

II. Reasons for Violation:

Section E of GP-01, which was used as a general instruction for bringing the plant from full power to a cold shutdown condition, was deficient in that it did not require that inoperative IRM channels be bypassed prior to placing the reactor mode switch in the "START-HOT STBY" position. As a result, an inoperable IRM scram occurred when the control operator transferred the reactor mode switch from "RUN" to "START-HOT STBY" due to trip signals from IRMs A and D which were inoperable (and not bypassed).

III. Corrective Steps Taken and Results Achieved:

Section E of GP-01 has been replaced by GP-05, titled Unit Shutdown. This new procedure includes the requirement to verify that inoperable IRMs are bypassed on the RTGB prior to placing the reactor mode switch to "START-HOT STBY," thus ensuring by positive means that an inadvertent IRM inoperative scram will not occur during a mode-switch position transfer.

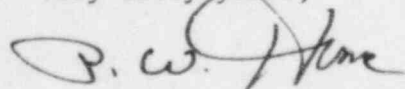
IV. Corrective Steps to be Taken:

A review will be conducted of the Operating Procedures, and appropriate precautions contained therein concerning mode-switch changes will be incorporated into the GPs.

V. Date Full Compliance Will be Achieved:

Full compliance with the corrective actions addressed for this event will be achieved by May 31, 1984.

Very truly yours,



P. W. Howe, Vice President
Brunswick Nuclear Project

RMP/mcg/LETGG2

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