



Carolina Power & Light Company

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

December 22, 1983

FILE: B09-13510C  
SERIAL: BSEP/83-3940

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 324/83-34 and 325/83-34 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 provided in the following text:

Violation A (Severity Level V)

10CFR50, Criteria VI, Document Control requires in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality." Corporate Quality Assurance Program, Section 6.2, implements this requirement.

Contrary to the above requirement, adequate procedures were not in place to control the review, approval, and issuance of "enhanced" control drawings, in that, on October 4, 1983, the inspector found that drawing No. FP 9527-50017-2, Sheet 8, Rev. A of March 8, 1983, was technically inadequate and, furthermore, had received no reviews or approvals before issuance and after major restoration had been performed.

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Response1. Admission or denial of the alleged violation

CP&L concurs the violation occurred as stated.

2. Reason for the violation

This violation resulted from an inadequacy in the administrative controls applicable to the site As-Built group in the Brunswick Engineering Support Unit (BESU). The As-Built group was working with unofficial guidelines directing the internal flow of enhanced drawings. The enhancement process in place at the time of this occurrence was only intended to improve the legibility of drawings and not to incorporate additional changes which would require formal checking/approval. The drawing referenced in this inspection report required more than the usual legibility touch-ups after the enhancement process (some areas were not clear and required redrafting). Several drafting errors were made when the areas were redrawn. The guidelines did not require checking of touch-up work on enhanced drawings. As a result, the drawing reference was then issued as Rev. A without having been processed through a formal checking/approval procedure.

3. Corrective steps which have been taken and the results achieved

- a. The Brunswick Engineering Support Unit (BESU) Manual of Instructions (Section 3.9) was revised on October 21, 1983, to require drawings that have been enhanced be processed through a full revision process prior to issuance.
- b. Drawings that had been enhanced and subsequently issued for distribution have been given a complete review, a new revision number, and reissued for distribution (completed October 31, 1983).
- c. A meeting was held by the Lead As-Built Engineer with the design/drafting personnel in the As-Built unit for the purpose of:
  - (1) Explaining the impact that errors on drawings can have on plant Operating Procedures and other site documents.
  - (2) Explaining the types of errors that appear frequently as a result of the enhancement process.
- d. The As-Built guidelines have been reviewed to determine which of the guidelines affected other BESU sections and/or are quality related. Based on this review, appropriate procedures were incorporated into the BESU Manual of Instructions. (Completed December 12, 1983.)

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4. Corrective actions to be taken

Those As-Built guidelines not incorporated into the BESU Manual of Instructions will be processed through a review/concurrence cycle by January 15, 1984.

5. Date for full compliance

Full compliance was achieved relative to this violation on December 12, 1983.

Very truly yours,



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

RMP/k1/LETC2

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