



Carolina Power & Light Company

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

December 7, 1983

FILE: B09-13510C  
SERIAL: BSEP/83-3859

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 324/83-32 and 325/83-32 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

Technical Specification 6.8.1.a requires written procedures be established for recommended activities in Appendix A of Regulatory Guide 1.33, November 1972. Item A.4 of Regulatory Guide 1.33 recommends that Administrative Procedures for Procedure Adherence be established.

Technical Specification 3.7.7.2 requires the deluge systems associated with the Standby Gas Treatment System to be operable; or, with one or more of the deluge systems inoperable, a fire watch must be established within one hour.

Contrary to the above, on September 1, 1983, an auxiliary operator failed to adhere to the requirements of Operating Instruction OI-13, Valve and Electrical Line-Up Verification, when he did not ensure that the component he was positioning had an identification tag as specified in Section 3.4 of the procedure. This failure resulted in improper identification of the component, a valve in the fire protection system, and this valve was improperly shut. As a result, the deluge systems of the Standby Gas Treatment System were inoperable from September 1-6, 1983, and no fire watch was established as required.

This is a Severity Level IV Violation (Supplement I.D.2).

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1. Admission or Denial of Alleged Violation

CP&L concurs that the violation occurred as stated.

2. Reason for the Violation

The root cause of this event was the failure of an auxiliary operator to comply with the requirements of Operating Instruction OI-13, Valve and Electrical Line-Up Verification, by not ensuring that the component he was positioning had an identification tag as specified in Section 3.4 of the procedure. Contributory causes involve the lack of a painted color code on the subject valve and the misuse of a piping and instrument diagram. Additional details involving this event are provided in LER 2-83-83.

3. Corrective Actions Which Have Been Taken

- a. The auxiliary operator involved has received appropriate disciplinary action.
- b. Real-time training was provided to operating shift personnel concerning OI-13 and its applicability to this event.
- c. Additional real-time training was performed for Operations personnel involving methods for valve identification, actions to be taken upon discovery of an "unidentified" valve, administration of clearance procedures, proper use of P&IDs, and an integrated review of this event.

These corrective measures have resulted in a satisfactory awareness of Operations personnel to prevent future occurrences of this nature.

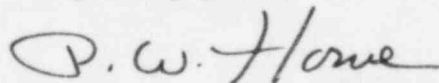
4. Corrective Actions to be Taken

Underground valves will be appropriately painted and/or labeled by December 31, 1983.

5. Date for Full Compliance

Full compliance involving this event has been achieved.

Very truly yours,



P. W. Howe, Vice President  
Brunswick Nuclear Project

TEC/pms/LETPS1

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