



Caroline Power & Light Company

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

April 4, 1984

FILE: B09-13510E  
SERIAL: BSEP/84-0902

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, UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
INSPECTION REPORTS 50-325/80-45 & 50-324/80-43

Dear Mr. O'Reilly:

Your letter of January 27, 1984, discussed the NRC staff's interpretation of 10CFR20.202(b)(2) and 10CFR20.203(b) with respect to Violation D, originally transmitted in Inspection Reports 50-325/80-45 and 50-324/80-43. The following response is provided with respect to the additional guidance provided and the initial notice of violation.

The statement that it is Brunswick's practice to only post the entrance to the Reactor Building is not correct. In addition to posting the Reactor Building, Brunswick posts high radiation areas, airborne radioactivity areas, and radioactive material areas within the Reactor Building. Brunswick supplements these postings by posting as "Hot Spots" localized areas on components or equipment which represent radiation exposure levels significantly greater than the general area in which they are located. Additionally, "Do Not Linger" signs are posted in areas where the general radiation exposure level is significantly greater than surrounding areas in the Reactor Building. These "Do Not Linger" signs visibly state the radiation level for the area in which they are located. This practice of supplemental posting was addressed in our original response to the notice of violation.

We agree with the guidance stated in your letter that posting the entrance to a very large room or building is inappropriate if most of the area is not a radiation area and only discrete areas or individual rooms actually meet the criteria for a radiation area. We would point out that this is not the case in regard to the Brunswick Reactor Buildings. With regard to the areas which

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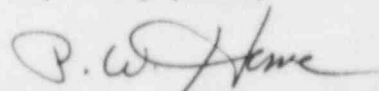
Mr. J. P. O'Reilly

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are normally accessible during unit operation, the Reactor Buildings are basically open structures with few individual rooms or discrete areas. The Reactor Buildings have exposed system piping and components containing radioactive materials routed throughout the general areas of the buildings. We have used temporary and permanent shielding where practical to reduce exposure levels within the Reactor Buildings; however, the majority of accessible spaces are within radiation areas; and there are no pathways allowing access through the Reactor Buildings without traveling through and within radiation areas the majority of the time.

It remains our contention that our program of controlling the entire Brunswick Reactor Buildings as radiation areas and supplementing this with additional posted information on radiation levels which are significantly higher than the general building radiation levels provides the best protection for the worker and provides adequate information to alert personnel to the presence of radiation levels such that they may minimize exposures they receive. We also contend that our program for posting the Brunswick Reactor Buildings meets the letter and intent of 10CFR20.202(b)(2) and 10CFR20.203(b).

Very truly yours,



P. W. Howe, Vice President  
Brunswick Steam Electric Plant

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