

CP&L

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Carolina Power & Light Company

Brunswick Steam Electric Plant

P. O. Box 10429

Southport, NC 28461-0429

May 2, 1984

FILE: B09-13510C

SERIAL: BSEP/84-1119

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 & 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 50-324/84-07 and 50-325/84-07 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 (Security Level V)

10CFR Part 19 - Notice, Instructions, and Reports to Workers; Inspections, Section 19.11(e), requires that Commission documents posted pursuant to paragraph (a)(4) of this section shall be posted within two working days after receipt of the documents from the Commission; paragraph (a)(4), in part, refers to specific Commission documents including "Proposed Imposition of Civil Penalty."

Contrary to the above, proposed imposition of civil penalty EA 83-88, issued to the licensee on January 10, 1984, and shown as received on January 13, 1984, was not posted until March 1, 1984.

I. Admission or Denial of Violation

Carolina Power & Light Company (CP&L) acknowledges that it failed to post proposed imposition of civil penalty EA 83-88 as required by 10CFR19.

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## II. Reason for Violation

The Regulatory Compliance Specialist responsible for the administration of NRC correspondence failed to recognize the requirement for posting either the proposed imposition of civil penalty or its associated response. He acknowledged that he knew of the posting requirement; however, while handling this document, he failed to recognize and implement the required posting. In addition, appropriate plant procedures were reviewed to assure required posting was adequately addressed. Although posting per 10CFR19 was adequately addressed in plant procedures, it is believed that the procedural guidance could be improved in format and description to help prevent future occurrences.

## III. Corrective Steps Taken and Results Achieved

The Regulatory Compliance Specialist was counseled by the Director - Regulatory Compliance, the Plant General Manager, and the Vice President - Brunswick Nuclear Project on the absolute requirement of strict compliance with regulations. In addition, the supervisory staff of the Regulatory Compliance subunit was counseled on the same concern by the Director - Regulatory Compliance during its March 17, 1984, staff meeting.

## IV. Corrective Steps To Be Taken

Plant procedures (RCI-6.2 and RCI-8.1) are currently being revised to provide an improved format and discussion of posting requirements as noted in 10CFR19.

## V. Date When Full Compliance Will Be Achieved

RCI-6.2 and RCI-8.1 will be revised by May 16, 1984.

## Violation B (Security Level V)

Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained. Administrative Procedure AP-01, paragraph 5.5.5, requires that within 14 days of a permanent change approval the change shall be entered in affected procedures. Emergency Instruction EI-29, Plant Shutdown from Outside Control Room, requires five copies of EI-29 to be kept at the remote shutdown panel.

Contrary to the above, the EI-29 procedures at the Unit 2 remote shutdown panel on February 16, 1984, were not the current Revision 12 approved January 25, 1984.

## I. Admission or Denial of the Alleged Violations

CP&L acknowledges that this was a violation of NRC requirements.

## II. Reason for Violation

This violation was caused by the on-duty Auxiliary Operator failing to audit the copies of EI-29 for the correct revision and Document Control failing to receive the document change transmittal for EI-29.

III. Corrective Steps Taken and Results Achieved

AOI-02, page 6, item 10, Control Operator Daily Check Sheet, requires that an audit be performed on a weekly basis of the remote shutdown procedures. This requirement has been amended to require that the revision of EI-29 is compared to that copy which is in the Control Room. Document Control has amended the accountability log to reflect that 12 copies will be sent to the on-shift Operations Technician for placement in the remote shutdown panel. The Operations Technician will be responsible for returning the document change transmittal when placement of the documents has been completed. The Operations Technician that is on shift is charged with the responsibility of placing the new revision in the remote shutdown panel. The Operations Technician has the responsibility for checking the revisions of EI-29 that are located in the remote shutdown panel on Tuesday of each week. The Auxiliary Operators that did not check for the proper revision of EI-29 have been counseled on the seriousness of this event. Revision 12 of EI-29 has been placed at the remote shutdown panel.

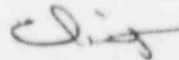
IV. Corrective Steps To Be Taken

Included in Part III above.

V. Date When Full Compliance Will Be Achieved

All corrective actions have been completed and no further action to prevent recurrence is required.

Very truly yours,



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

RMP/dgr/LETJ05

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