



Carolina Power & Light Company
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February 19, 1996

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

Serial: PE&RAS-96-019

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324 / LICENSE NOS. DPR-71 AND DPR-62

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400 / LICENSE NO. NPF-63

Subject: Onsite Chemical Laboratory Analysis Deficiencies

Gentlemen:

The purpose of this letter is to provide the NRC staff with information regarding recent onsite pre-screening chemical laboratory analysis deficiencies which were identified by Carolina Power & Light Company (CP&L) at the Brunswick Steam Electric Plant, Units 1 and 2. This issue was discussed with and reviewed by the NRC staff during the week of February 5, 1996.

As a result of CP&L's investigation into the events at the Brunswick Nuclear Plant, a deficiency was also identified with the services the vendor provided for the Shearon Harris Nuclear Power Plant from August to September, 1995. Enclosure 1 provides specific information on the events and the corrective actions taken by CP&L and Enclosure 2 provides a list of regulatory commitments.

If you have additional questions, please call me at (919) 546-6901.

Sincerely,

T. D. Walt
Manager - Performance
Evaluation & Regulatory Affairs

KAH/PNM/pnm
Enclosures

- c: Mr. L. L. Bush, Jr., Division of Reactor Program Management, NRR
Mr. S. D. Ebnetter, Regional Administrator, Region II
Mr. N. B. Le, NRR Project Manager - Harris Unit 1
Mr. W. T. Orders, NRC Senior Resident Inspector - Harris Unit 1
Mr. C. A. Patterson, NRC Senior Resident Inspector - Brunswick Units 1 and 2
Mr. D. C. Trimble, Jr., NRR Project Manager - Brunswick Units 1 and 2
Mr. D. H. Thompson, NRC Region II Inspector
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

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ENCLOSURE 1

**BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
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ONSITE CHEMICAL LABORATORY ANALYSIS DEFICIENCIES

BACKGROUND

Carolina Power & Light Company (CP&L) contracted with a vendor to provide on-site pre-screening services to support outage in-processing at the Harris Plant August 14, 1995 through September 14, 1995, and at the Brunswick Plant January 8, 1996 through February 16, 1996. The contracts stipulated that the onsite pre-screening services comply with 10 CFR Part 26 requirements.

The on-site pre-screening operations were suspended at the Brunswick Plant on January 16, 1996, upon discovery of events related to processing errors associated with the on-site vendor services. A Condition Report was generated and a root cause evaluation conducted in response to the events. As a result of evaluations conducted by both the vendor and CP&L, additional errors were discovered. A discussion of the events, the event cause, corrective actions taken, and corrective actions planned follows.

EVENTS

The following events were identified:

January 12, 1996

The on-site pre-screening services vendor notified CP&L on January 8, 1996, of two errors relative to pre-screen testing at the Brunswick Nuclear Plant. The first error involved a suspect positive test result that had been reported to CP&L as negative. The involved individual had been granted unescorted access to the Brunswick Nuclear Plant. Upon notification of the error, the individual's access was immediately suspended, and the involved individual was retested. The retest result was negative. The second error involved a negative test result for another individual at the Brunswick Nuclear Plant that was erroneously reported as a suspect positive test result. The involved individual was not badged. This individual was also retested, and the retest result was negative.

January 16, 1996

CP&L identified that the on-site pre-screening services vendor reported a negative test result to CP&L on January 15, 1996, for the Brunswick Nuclear Plant which should have been reported as inconclusive due to low specific gravity. The involved individual was not badged. The individual was retested, and the retest result was positive. Future access for the involved individual has been denied.

January 26, 1996

Through an internal audit by the on-site pre-screening services vendor it was discovered that, on January 15, 1996, a pre-screen test result that was reported to the Brunswick Nuclear Plant as negative should have been reported as positive. The involved individual had been assigned a badge number, but had not completed the hand geometry required for access. The individual was retested, and the retest result was positive. Future access for the involved individual has been denied.

January 27, 1996

As a result of a CP&L review of the on-site pre-screening services vendor performance at both the Harris and Brunswick Nuclear Plants, additional errors were discovered at both facilities. Two Brunswick Nuclear Plant specimens previously processed on-site with low specific gravity had not been forwarded to the Department of Health and Human Services (HHS) Lab for additional testing, contrary to 10 CFR Part 26, Appendix A, Section 2.4(g)(16). The involved individuals were subjected to a recollection. Neither individual was badged prior to being retested. One individual was denied future access due to a positive result.

CP&L also identified that five (5) Harris Nuclear Plant specimens previously processed on-site with low specific gravity had not been forwarded to the HHS Lab for additional testing, contrary to 10 CFR Part 26, Appendix A, Section 2.4(g)(16). The involved individuals were subjected to a recollection which resulted in five negative tests. None of the individuals were badged prior to being retested. No additional program concerns were identified at the Harris Plant by the CP&L review.

EVENT CAUSE

The above events demonstrate a failure of the pre-screening services vendor to fulfill contractual terms and conditions and are attributed to: (1) individual laboratory manager performance errors; and (2) limited training based on experience of individuals, coupled with minimal procedural guidance.

CORRECTIVE ACTIONS

The following actions have been taken by CP&L in response to the above events:

- notification of NRC Region II and the Brunswick NRC Resident Inspector upon discovering the January 12, 1996 event;
- logging of the events in the Safeguards Event Log;
- suspension of vendor pre-screening operations on January 16, 1996, as a result of the discovery of the second incident;
- request by CP&L on January 16, 1996, for a vendor representative to report onsite to conduct an operational review;
- notification made to NRC Region II of the decision on January 19, 1996, not to restart vendor pre-screening operations at the Brunswick Nuclear Plant;
- suspension of the involved individual's access and/or processing upon discovery of the errors and initiation of appropriate testing;
- completion of a CP&L audit on vendor's performance through a reconciliation of the laboratory records for the Brunswick and Harris Nuclear Plants;
- initiation of Condition Reports for the events and completion of a root cause investigation;
- interviews of laboratory operations personnel to ensure there was no conflict of interest or willful misconduct involved in the events;
- completion of a review by a licensed toxicologist of the clinical and technical aspects of the pre-screening operations, with a report provided on February 6, 1996, with no deficiencies noted; and
- release to the industry of a joint statement from CP&L and the vendor via the INPO Nuclear Network (Message OE 7685, dated February 13, 1996), summarizing the onsite pre-screening events identified herein.

Additional corrective actions are being taken by CP&L to prevent future occurrences. Prior to the use of vendor pre-screening operations in the future, CP&L will ensure that:

- More detailed procedures are provided by the vendor and reviewed by CP&L to ensure compliance with 10 CFR Part 26;
- a preoperational simulation is successfully performed by the vendor and reviewed by CP&L;
- an independent assessment of operational competency is completed, with the results reviewed by CP&L; and
- an assessment is performed of the laboratory manager's qualifications by CP&L to ensure that the individual has demonstrated laboratory operations oversight proficiency in a nuclear environment or other regulatory-certified operations.

SUMMARY

Although the events discussed above were indicative of significant deficiencies in the vendor's pre-screening services, the events did not involve a significant threat to plant safety. No licensed or supervisory personnel were involved in any of the incidents. The worker provided access to the protected area was a craft worker not involved in safety related work activities. Interviews conducted by Security personnel with the individual's supervisor and subsequent FFD testing did not indicate any fitness-for-duty issues.

ENCLOSURE 2

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LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Carolina Power & Light Company in this document. Any other actions discussed in the submittal represent intended or planned actions by Carolina Power & Light Company. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Brunswick Nuclear Plant of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage ²
<p>1. Prior to the use of vendor pre-screening operations in the future, CP&L will ensure that:</p> <ul style="list-style-type: none">• More detailed procedures are provided by the vendor and reviewed by CP&L to ensure compliance with 10 CFR Part 26;• a preoperational simulation is successfully performed by the vendor and reviewed by CP&L;• an independent assessment of operational competency is completed, with the results reviewed by CP&L; and• an assessment is performed of the laboratory manager's qualifications by CP&L to ensure that the individual has demonstrated laboratory operations oversight proficiency in a nuclear environment or other regulatory-certified operations.	NA*

* No specific date for completion of actions is given. Commitment is made to perform these actions prior to future use of any vendor pre-screening operations.