



Carolina Power & Light Company  
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William R. Campbell  
Vice President  
Brunswick Nuclear Plant

SEP 30 1996

SERIAL: BSEP 96-0336  
10 CFR 2.201

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62  
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

On August 30, 1996, the Nuclear Regulatory Commission (NRC) issued a Notice of Violation for the Brunswick Steam Electric Plant, Units 1 and 2. The basis for the violation is provided in NRC Inspection Report 50-325/96-10 and 50-324/96-10.

Carolina Power & Light Company admits the violation occurred as described in NRC Inspection Report 50-325/96-10 and 50-324/96-10. Enclosure 1 provides Carolina Power & Light Company's response to the violation in accordance with the provisions of 10 CFR 2.201.

Carolina Power & Light Company finds the inspection does not contain information of a proprietary nature. Please refer any questions regarding this submittal to Mr. G. D. Hicks at (910) 457-2163.

Sincerely,

William R. Campbell

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PDR ADOCK 05000324  
G PDR

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Enclosures

1. Reply to Notice of Violations
2. List of Commitments

cc: Mr. S. D. Ebnetter, Regional Administrator, Region II  
Mr. D. C. Trimble, Jr., NRR Project Manager - Brunswick Units 1 and 2  
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector  
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

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ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 and 2  
NRC DOCKET NOS. 50-325 & 50-324  
OPERATING LICENSE NOS. DPR-71 & DPR-62  
REPLY TO NOTICE OF VIOLATION

VIOLATION:

During an NRC inspection conducted on July 8 through July 13, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (NUREG-1600), the violation is listed below:

Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained covering the activities referenced in the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, dated February 1978. Paragraph 1.b of Appendix A to Regulatory Guide 1.33 states that the licensee have administrative procedures concerning authorities and responsibilities for safe operation and shutdown.

Training Memorandum TM-1.05, Student Counseling and Remedial Training, revision 4, dated September 18, 1995, Paragraph 4.5.1.b, states that an Academic Review Board is mandatory after three test failures within a 12 month period in an initial or Licensed Operator Requalification (LOR) program or course.

Contrary to the above, on July 10, 1996, the NRC identified that the licensee failed to follow TM-1.05 in that an Academic Review Board was not convened to disposition seven repeated LOR failures (from 1994 - 1996) that failed three requalification examinations within a 12 month period.

This is a Severity Level IV violation (Supplement I). This is applicable to both Units.

RESPONSE TO THE VIOLATION:

Admission or Denial of Violation:

Carolina Power & Light admits this violation.

Reason for Violation:

The inclusion of the academic board requirement in TM -1.05, Student Counseling and Remedial Training, was intended to apply to initial training programs only and this requirement was met. However, the wording did not clearly limit the review process to initial training program students.

Corrective Actions Which Have Been Taken and Results Achieved:

During the investigation of this event, the procedure revision which implemented the academic review board requirement was located and retrieved from document services. The effective date of this revision was June 26, 1995. Training records from implementation of this procedure revision to the present were reviewed and individuals who had three failures on examinations in a 12 month period within the duration of an LOR program were identified. Although not specified in the procedure, simulator evaluations were included and counted as failures during this review.

Three individuals were identified whose performance on course examinations and simulator evaluations indicated their cases should have been reviewed in accordance with the guidance in TM-1.05. One of these individuals is no longer employed by Carolina Power & Light Company. Academic Review Boards have been scheduled to review the remaining two cases and determine appropriate action.

LOR instructors received a briefing from their supervisor clarifying the application of TM-1.05 requirements for LOR programs.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

A revision to TM-1.05 will be implemented to specifically include requirements for academic review of LOR training program failures.

Review boards will be convened by October 4, 1996, to support the review of the cases for the two individuals identified as meeting exam failure criteria requiring Academic Review Boards.

Date When Full Compliance Will Be Achieved:

Carolina Power and Light believes that it is in full compliance with the requirements of Technical Specification 6.8.1.

Enclosure 2  
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
1. Review boards will be convened to support the review of the cases for the two individuals identified as meeting exam failure criteria requiring Academic Review Boards.	10/4/96
2. A revision to TM-1.05 will be implemented to specifically include requirements for academic review of LOR training program failures.	11/30/96