

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Units 1 and 2

Docket Nos. 50-325 and 50-324
License Nos. DPR-71 and DPR-62

During an NRC inspection conducted from August 4 through September 14, 1996, five violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification (TS) 6.8.1 requires that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33, Appendix A, requires specific procedures for equipment control.

Administrative Instruction OAI-58, Equipment Clearance Procedure, implements the requirements of TS 6.8.1. OAI-58, Section 5.4 requires a temporary tag lift request to be completed to allow a tag to be lifted to perform testing.

Contrary to the above, on August 21, 1996, while performing Periodic Test OPT-20.8.2, 1-CAC-AT-4410 Leak Test, a Reactor Operator positioned a Containment Atmospheric Control sample select switch which was under clearance without the OAI-58 required temporary tag lift.

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

- B. 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, dated November 1972. Paragraph A. of Appendix A to Regulatory Guide 1.33 states that the licensee have administrative procedures concerning authorities and responsibilities for safe operation and shutdown.

TM-4.21, Revision 1, dated October 30, 1995, LSRO to Refueling Training Program, paragraph 4.1.3.d, states, in part, that "each candidate will satisfactorily complete an Limited Senior Reactor Operator (LSRO) Qual card (TM-4.02.08) prior to the LSRO Audit Examination."

Contrary to the above, on September 10, 1996, the NRC identified that the licensee failed to follow TM-4.21 in that one LSRO candidate failed to complete the LSRO training program prior to taking the LSRO audit examination.

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

- C. 10 CFR 70.24 (a)(2), Criticality Accident Requirements, requires that criticality monitors shall have a preset alarm point of not less than 5 millirem (mR) per hour.

Contrary to the above, the Unit 2 new fuel vault criticality monitor was set at 3 mR/hr. This condition has existed since discovery in 1994 until the monitor was reset on August 21, 1996.

This is a Severity Level IV Violation (Supplement I). This is applicable to Unit 2 only.

- D. Technical Specification 6.8.1 requires that written procedures will be established, implemented, and maintained covering the activities recommended in Appendix A, Paragraph G, "Procedures for Control of Radioactivity" of Regulatory Guide 1.33, dated November 1972.

Contrary to the above, on July 8, 1996, the licensee failed to implement procedure(s) and work controls necessary to effectively control radioactivity commensurate with the hazards of the specified work evolution being performed on the Unit 1 refueling floor and in the equipment pool.

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

- E. 10 CFR 20.1501(a) requires each licensee shall make or cause to be made, surveys that are reasonable under the circumstances to evaluate concentrations or quantities of radioactive material and the potential radiological hazards that could be present.

Contrary to the above, on July 8, 1996, during performance of work in the Unit 1 equipment pool, the licensee failed to perform adequate surveys to evaluate the potential radiological hazards that could be present from unknown concentrations or quantities of airborne radioactivity.

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

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your

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response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
This 11th day of October 1996