



Carolina Power & Light Company

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Brunswick Steam Electric Plant

P. O. Box 10429  
Southport, NC 28461-0429

September 12, 1985

FILE: B09-13510E  
SERIAL: BSEP/85-1593

Dr. J. Nelson Grace, Administrator  
U.S. Nuclear Regulatory Commission  
Suite 2900  
101 Marietta Street NW  
Atlanta, GA 30323

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS DPR-71 AND DPR-62  
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Dr. Grace:

The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/85-22 and 50-324/85-22 and finds that it does not contain information of a proprietary nature.

This report identified two violations that appeared to be in noncompliance with NRC requirements. Enclosed please find Carolina Power & Light Company's response to the first violation. Per a telephone conversation between Mr. R. M. Poulk, Jr., of the BSEP staff, and Mr. Paul Fredrickson, of your staff, on September 3, 1985, the response to the second violation will be submitted on October 25, 1985, in conjunction with the delayed response to IE Report 85-19, Example C of Violation 1.

Very truly yours,

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

RMP/dj

Enclosure

cc: NRC Document Control Desk

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## VIOLATION

10CFR50, Appendix B, Criterion XVI, as implemented by FSAR Section 17.2.16, Corrective Action, requires measures be established to assure that conditions adverse to quality (i.e., deficiencies) are promptly identified and corrected. Technical Specification 6.8.1.c requires that the licensee maintain and implement procedures specified in Regulatory Guide 1.33, November 1972. Item E of the guide requires that procedures for correcting abnormal, offnormal, or alarm conditions be implemented.

Contrary to the above, a condition adverse to quality was not adequately corrected in that most annunciator procedures which required changes, necessitated by the introduction of Emergency Operating and Abnormal Operating Procedures and the elimination of the Emergency Instructions, were not updated and corrected or an alternate means adequately provided to clarify reference discrepancies contained in the procedures.

This is a Severity Level V violation (Supplement I).

## RESPONSE

### I. Admission or Denial of the Alleged Violation

CP&L acknowledges the violation occurred as stated.

### II. Reason for Violation

Both the Emergency Instructions (EIs) and the Annunciator Procedures (APPs) were being revised during the same time frame as a result of establishing the Emergency Operating Procedures. Since the disposition of all EIs was not known while the APPs were being written, a cross-reference was developed to provide operators with readily available means to cross-reference the old EIs with the appropriate new procedure. This cross-reference was updated as EIs were deleted and was posted in the Control Room.

The cross-reference was not maintained as a controlled document and was removed from the Control Room between May 1984 and May 1985. Failure to control this cross-reference resulted in references on procedures to EIs which did not exist. The biennial review, although identifying many of these deficiencies, did not identify all, as the reviewers felt the EI discrepancies were already being handled.

### III. Corrective Steps Which Have Been Taken and Results Achieved

The cross-reference between Emergency Instructions (EIs) and Abnormal Operating Procedures (AOPs) has been approved as an operator aid and has been posted in the Control Room, in accordance with OI-01.

IV. Corrective Steps Which Will Be Taken

- (A) A systematic review and revision of the APPs is in progress that will delete the EI references and incorporate the correct procedure.
- (B) Real-time training will review this occurrence with Operations technical reviewers, stressing the importance of the biennial review.

V. Date When Full Compliance Will Be Achieved

Corrective actions will be completed by February 2, 1986.