

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Units 1 & 2

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

During an NRC inspection conducted from September 15 through October 26, 1996, three 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. 10 CFR 50 Appendix B, Criteria XVI, Corrective Action, requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material, and equipment nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, the licensee failed to correct an adverse condition which resulted in a history of chlorine detector failures. On September 19, 1996, during performance of OMST-CLDET21A, Chlorination Detection System Channel Calibration, four of four chlorine detectors at the control building intake plenum and one of four detectors at the service water building failed the acceptance testing. Previous corrective actions from similar failures in March 1995 and April 1996 to prevent recurrence were established per Licensee Event Reports 1-95-02 and 1-96-05. These actions failed to correct the detector failures. In Inspection Report 325(324)/96-05 the NRC issued violation 96-05-01 to address the failure of the licensee to implement actions to promptly identify and correct the nonconformances; the September 19, 1996, detector failures are seen as a repeat of this violation.

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

- B. Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable activities recommended in Appendix A of Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33 recommends procedures for the control of alarm devices to assure that the device is properly controlled, calibrated, and adjusted at specified periods to maintain accuracy.

Environmental & Radiation Control Procedure 0-E&RC-0358, Area Radiation Monitors (ARM) Radiation Response Monthly Test, Revision 6, requires a determination if the as found ARM readings accurately indicate area radiation levels. If found outside of the expected range, a judgment would be made to determine if actual area readings had changed or if the monitor required maintenance.

Contrary to the above, during the July 25 and August 14, 1996, performances of 0-E&RC-0358 the licensee failed to implement the requirements to properly determine the status of the ARMs. In numerous instances upon finding monitors outside of the expected range the

technicians failed to make the determination if actual radiation levels had changed or if the monitors required maintenance.

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

- C. 10 CFR 50, Appendix B, Criteria V requires that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Contrary to these requirements, as of October 25, 1996, instructions or procedures and drawings were either not followed or were not appropriate (adequate) for the modifications of the electrical cabinets as described below:

1. Section 9.14.6 of Procedure OMMP-04, Installation of Piping, HVAC, and I & C Tubing Supports, Revision 2, dated December 12, 1994, requires that bolts shall have full thread engagement.

The bolts installed on electrical cabinets 21A-1, 21A-2, 22B-1, and 22B-2 did not have full thread engagement.

2. The drawing shown on Page 23 of Engineering Service Request 9600407, Revisions 0 through 6 requires repair of loose hardware for the instrument rack for electrical cabinet P615.

The loose hardware was not repaired because of a drawing error, which did not clearly show the correct location of the repair, and the misinterpretation of the repair requirements by licensee personnel.

3. Section 9.7 of Procedure EGR-NGGC-0005, Engineering Service Request (ESR), Revision 1, dated August 2, 1996, requires revisions to ESR documents to be documented and approved. The drawing shown on Page 16 of Calculation No. ESR 9600407, Revisions 0 through 6, requires plate sizes to be 3/8" X 2" X 4-3/4" or 3/8" X 2" X 5" which are to connect electrical cabinets XU63 and XU64.

The installed plate sizes connecting cabinets XU63 and XU64 were measured to be 3/8" X 2-5/8" X 5-5/8" which exceeded the 1/4" installation tolerance and required a revision to the drawing (ESR document). The drawing was not revised in accordance with Section 9.7 of EGR-NGGC-0005.

This is a Severity Level IV Violation (Supplement I). This is applicable to Unit 1 only.

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 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 22nd day of November 1996