

ACTION REQUEST 00236389

Type : NCR Orig Date: 06/13/07 18:21 Discovery Date:  
Subject : TRITIUM IDENTIFIED IN MANHOLE 2-MH-2SE

**Description**

TRITIUM HAS BEEN IDENTIFIED IN MANHOLE 2-MH-2SE. THE TRITIUM ACTIVITY WAS 1.949E-5 UCI/ML (19,490 PCI/L). THE APPROXIMATE LOCATION OF THE MANHOLE IS IN THE VICINITY OF THE STACK AND THE INTAKE STRUCTURE.

Priority : 2 Report To : Status: COMPLETE 11/19/08  
Due Date : 12/31/08 Event Date : .

Originator : MILLIM02 Originator Group:  
Facility : BNP Department : Z84 Organization:

Owed To : Owed To Group : ERCUEVAL  
Owed To Fac: BNP Department : Discipline :

**AR Status History**

Updated Date	Updated By	AR Status	AR Due Date
06/13/07	MILLIM02	INPROG	
06/13/07	MILLIM02	H/APPR	
06/19/07	HOLLEN	PRE-APRV	
06/19/07	HOLLEN		12/13/07
06/19/07	HOLLEN	APPROVED	
10/10/07	HOLLEN		08/30/08
06/21/08	HOLLEN		11/06/08
08/21/08	HOLLEN		12/04/08
11/06/08	HOLLEN		12/31/08
11/19/08	HOLLEN	COMPLETE	

J-75

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Request Attribute	Value	Reqd	Date
1A POT'L OPER/REPORT	N	Y	06/13/07
Name : MICHAEL	MILLINOR		

Request Attribute	Value	Reqd	Date
1B EQUIPMENT RELATED	N	Y	06/13/07
Name : MICHAEL	MILLINOR		

Request Attribute	Value	Reqd	Date
2 SUPERVISOR REVIEW	Y	N	06/17/07
Name : JERRY	JOHNSON JR.		

Request Attribute	Value	Reqd	Date
2A CR VALID?	Y	Y	06/17/07
Name : JERRY	JOHNSON JR.		

Request Attribute	Value	Reqd	Date
2B FURTHER INVN REQD	Y	Y	06/17/07
Name : JERRY	JOHNSON JR.		

Information to include for No Further Investigation Required  
Include the following information for Priority 2:  
" Inappropriate Act statement (include work group involved, if known)  
" Apparent Cause including code  
" Completed Corrective Actions - CORR, or  
" Additional Corrective Actions if needed - including recommended assignee and recommended due date  
Include the following information for Priority 3:  
" Completed Corrective Actions - CORL, or  
" Additional Corrective Actions if needed - including recommended assignee and recommended due date

Request Attribute	Value	Reqd	Date
2C RECOMMENDED OWNER	MIKE MILLINOR	N	06/17/07
Name : JERRY	JOHNSON JR.		

Request Attribute	Value	Reqd	Date
2D OPER/REPORT ISSUE	N	Y	06/17/07
Name : JERRY	JOHNSON JR.		

Request Attribute	Value	Reqd	Date
2D1EQUIPMENT RELATED	N	Y	06/17/07
Name : JERRY	JOHNSON JR.		

Request Attribute	Value	Reqd	Date
2E MAINT RULE APPLIC	N	N	06/17/07
Name : JERRY	JOHNSON JR.		

ACTION REQUEST 00236389

Request Attribute	Value	Reqd Date
2F SYSTEM	5259	Y 06/21/07
Name : SYLVIA	EDWARDS	

Added 5259 per Jim Boone, MR Coordinator. sde 6/21/07

Request Attribute	Value	Reqd Date
3 OPERATIONS REVIEW		N
Name :		

Request Attribute	Value	Reqd Date
3A IMMEDIATE REPT ISSUE	N	N 06/17/07
Name : STEVEN	GORDY	

A Licensee Event Report (LER) is due to the NRC only if any liquid effluent release, when averaged over a time period of 1 hour, exceeds 20 times the applicable concentrations specified in Appendix B to Part 20, Table 2, Column 2, at the point of entry into the receiving waters (i.e., unrestricted area) for all radionuclides except tritium and dissolved noble gasses. Reference 10CFR50.73(a)(2)(viii).

The release (tritium at approx 3.3E-4uCi/ml) is less than the 1.0E-3 listed in App B to Part 20.

ORCI-06.1, Attachment 1, has the exact same criteria for mandatory reporting.

For voluntary reporting, Attachment 1, page 18 and 19, specifies that a report should be made if an inadvertent unmonitored leak or spill has or can potentially get into groundwater that is used for drinking water or could be used for drinking water.

We do not have any reason to believe that this leak can get into any drinking water. The leak is following the release path directly to the intake canal. The hydrology experts on site this week will evaluate for any long term potential impact.

Request Attribute	Value	Reqd Date
3B OCR	N	N 06/17/07
Name : STEVEN	GORDY	

Request Attribute	Value	Reqd Date
3B1 OPER ISSUE	N	N 06/17/07
Name : STEVEN	GORDY	

Request Attribute	Value	Reqd Date
3B2 REPORT ISSUE	N	N 06/17/07
Name : STEVEN	GORDY	

A Licensee Event Report (LER) is due to the NRC only if any liquid effluent release, when averaged over a time period of 1 hour, exceeds 20 times the applicable concentrations specified in Appendix B to Part 20, Table 2, Column 2, at the point of entry into the receiving waters (i.e., unrestricted area) for all radionuclides except tritium and dissolved noble gasses. Reference 10CFR50.73(a)(2)(viii).

The release (tritium at approx 3.3E-4uCi/ml) is less than the 1.0E-3 listed in App B to Part 20.

ORCI-06.1, Attachment 1, has the exact same criteria for mandatory reporting.

For voluntary reporting, Attachment 1, page 18 and 19, specifies that a report should be made if an inadvertent unmonitored leak or spill has or can potentially get into groundwater that is used for drinking water or

ACTION REQUEST 00236389

could be used for drinking water.

We do not have any reason to believe that this leak can get into any drinking water. The leak is following the release path directly to the intake canal. The hydrology experts on site this week will evaluate for any long term potential impact.

Request Attribute	Value	Reqd	Date
3B3 REW	N	N	06/17/07
Name : STEVEN	GORDY		

Request Attribute	Value	Reqd	Date
3B4 DEG/NCON	N		06/17/07
Name : STEVEN	GORDY		

Request Attribute	Value	Reqd	Date
3C TRACKING NUMBER	N	N	06/17/07
Name : STEVEN	GORDY		

Request Attribute	Value	Reqd	Date
4 REG AFF REVIEW		N	
Name :			

Request Attribute	Value	Reqd	Date
4A OPER/REPORT ISSUE	N	Y	06/18/07
Name : MARK	TURKAL		

Request Attribute	Value	Reqd	Date
4A1 OPER ISSUE	N	Y	06/18/07
Name : MARK	TURKAL		

Request Attribute	Value	Reqd	Date
4A2 REPORT ISSUE	N	Y	06/18/07
Name : MARK	TURKAL		

Request Attribute	Value	Reqd	Date
4A3 REW	N	Y	06/18/07
Name : MARK	TURKAL		

Request Attribute	Value	Reqd	Date
4A4 DEG/NCON	N		06/18/07
Name : MARK	TURKAL		

Request Attribute	Value	Reqd	Date
4B FOLLOWUP ASG REQD	N	Y	06/18/07
Name : MARK	TURKAL		

Request Attribute	Value	Reqd	Date
4C T. SPEC VIOLATION	N	Y	06/18/07
Name : MARK	TURKAL		

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Request Attribute	Value	Reqd	Date
4D ADD'L REPORT REQD	N	Y	06/18/07
Name :	MARK TURKAL		

Request Attribute	Value	Reqd	Date
4E PNSC/CSERB REQD	N	Y	06/18/07
Name :	MARK TURKAL		

Request Attribute	Value	Reqd	Date
5 CLASSIFN/ASSIGNMNT		N	
Name :			

Request Attribute	Value	Reqd	Date
5A CR VALID?	Y	Y	06/19/07
Name :	NANCY HOLLEY		

Request Attribute	Value	Reqd	Date
5B FURTHER INVN REQD	Y	Y	06/19/07
Name :	NANCY HOLLEY		

Request Attribute	Value	Reqd	Date
6 MISCELLANEOUS		N	
Name :			

Request Attribute	Value	Reqd	Date
6A COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6B COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6C COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6D COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6E COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6F LAST COM ITM DUE			
Name :			

ACTION REQUEST 00236389

Request Attribute Value Reqd Date  
 6G EQUIP PRI ISSUE N  
 Name :

Request Attribute Value Reqd Date  
 6H RESP MGR N  
 Name :

Request Attribute Value Reqd Date  
 6I EQUIP PRI STATUS N  
 Name :

**ACTION REQUEST APPROVAL REVIEW**

Route List: 001			Route List Initiator: MILLIM02			
Alert	Send	Send	Action	Action		
PASSPORT Fac Group/Type Last Name	Date	Time	Taken	Date/Time		
JOHNSJ03 BNP ERCCSUPV A JOHNSON JR.	06/13/07	18:21	APPROVED	06/17/07 09:53		
GORDYS BNP CONTROOM A GORDY	06/17/07	09:53	APPROVED	06/17/07 18:20		
TURKAM BNP REGREV A TURKAL	06/17/07	18:20	APPROVED	06/18/07 06:44		
HOLLEN BNP UNITEVAL A HOLLEY	06/18/07	06:44	APPROVED	06/19/07 14:21		

**TREND-CAUSE**

Facility: BNP Trend 1: ACAUSE Trend 2: L Trend 3: L1 Date: 07/25/07  
 Process: N/A Org: EC Rank: N Assign:  
 Description: PROBLEM WAS A HISTORICAL ONE  
 TRITIUM WAS IDENTIFIED IN WATER IN MANHOLE 2-MH-2SE.

Facility: BNP Trend 1: EVENT Trend 2: EC Trend 3: EC59 Date: 06/19/07  
 Process: EN1 Org: N/A Rank: Assign:  
 Description: OUT OF SPEC PARAMETER (SYS, TECH, MATERIAL SPEC, R

**Keywords**

Keyword	Keyword Description
ENVIR	OUTDOOR SPILLS, NPDES?STP, ENVIR. INDEX IMPACTS

**AR REFERENCE DOCUMENTS**

DOC	SUB	DOCUMENT	REV	MIN	TITLE
TYP	TYP		OR		
BNP	AR	00236389	000		TRITIUM IDENTIFIED IN MANHOLE

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ASSIGNMENT NUMBER 02 SUB

Type : INVN Due Date : 07/27/07  
Status : COMPLETE Reschedule : 1 Pri Resp Group: ERCCSUPT  
Assigned To : N HOLLEY Sec Resp Group:  
Subject : ADVERSE CONDITION INVESTIGATION

Aff Facility: BNP Unit : System :  
UCR : Schedule Ref :  
Organization: Department : Z58 Discipline :  
Est Manhrs : Est Comp Date :

Assignment Status History

Updated Date	Updated By	Assgn Status	Assgn Due Date
06/13/07	MILLIM02	INPROG	
06/19/07	HOLLEN		07/12/07
06/19/07	HOLLEN	ACC/PRI	
06/19/07	HOLLEN	NTFY/ASG	
06/20/07	MILLIM02	ACC/ASG	
07/12/07	HOLLEN		07/27/07
07/20/07	MILLIM02	AWAIT/C	
07/25/07	HOLLEN	ACC/ASG	
07/25/07	HOLLEN	NTFY/ASG	
07/25/07	HOLLEN	ACC/ASG	
07/25/07	HOLLEN	AWAIT/C	
07/25/07	HOLLEN	COMPLETE	

Assignment Attribute Value Reqd Date  
BENEFIT REALIZED N  
Name :

Assignment Attribute Value Reqd Date  
EXTERNAL OE RECOMM N Y 07/20/07  
Name : MICHAEL MILLINOR

Assignment Attribute Value Reqd Date  
INTERNAL OE RECOMM N Y 07/20/07  
Name : MICHAEL MILLINOR

Assignment Attribute Value Reqd Date  
1 EVALUATOR/ASSIGNEE N  
Name :

Assignment Attribute Value Reqd Date  
1A COMMITTED N  
Name :

ACTION REQUEST 00236389

<b>Assignment Attribute Value</b>		<b>Reqd Date</b>
1B CHANGE BASIS	PLEASE EXTEND	N 07/11/07
Name : MICHAEL	MILLINOR	

Please extend until 7/27/07 due to emergent tritium issues with SDSP.

<b>Assignment Attribute Value</b>		<b>Reqd Date</b>
2 MISCELLANEOUS		N
Name :		

<b>Assignment Attribute Value</b>		<b>Reqd Date</b>
2A COMMENTS		N
Name :		

<b>Assignment Attribute Value</b>		<b>Reqd Date</b>
2B COMMENTS		N
Name :		

<b>Assignment Attribute Value</b>		<b>Reqd Date</b>
2C COMMENTS		N
Name :		

<b>Assignment Attribute Value</b>		<b>Reqd Date</b>
2D COMMENTS		N
Name :		

<b>Assignment Attribute Value</b>		<b>Reqd Date</b>
2E COMMENTS		N
Name :		

**COMPLETION NOTES**  
 PLEASE INCLUDE IN DECOMMISSIONING RECORDS.

**CAUSE/ACTION**

**ASSIGNMENT COMPLETION APPROVAL**

<b>Route List: 001</b>		<b>Route List Initiator: HOLLEN</b>
Alert		Send Send Action Action
PASSPORT Fac Group/Type Last Name		Date Time Taken Date/Time
JOHNSJ03 BNP ERCCSUPT A JOHNSON JR.		07/20/07 14:06 APPROVED 07/23/07 14:18
HOLLEN BNP ERCUEVAL A HOLLEY		07/23/07 14:18 RETURNED 07/25/07 15:13
BNP ERCCSUPT A HOLLEY		07/25/07 15:53 BYPASSED 07/25/07 15:53
HOLLEN BNP ERCUEVAL A HOLLEY		07/25/07 15:53 APPROVED 07/25/07 15:53

ACTION REQUEST 00236389

ASSIGNMENT NUMBER 05 SUB

Type : CORR Due Date : 12/04/08  
Status : COMPLETE Reschedule : 2 Pri Resp Group: ERCCSUPT  
Assigned To : M MILLINOR Sec Resp Group:  
Subject : DOCUMENT EVALUATION FOR ANY LONG TERM POTENTIAL IMPACT  
Aff Facility: BNP Unit : System :  
UCR : Schedule Ref : LTCA  
Organization: Department : Z84 Discipline :  
Est Manhrs : Est Comp Date :

Assignment Status History

Updated Date	Updated By	Assgn Status	Assgn Due Date
06/13/07	MILLIM02	INPROG	
06/19/07	HOLLEN		10/17/07
06/19/07	HOLLEN	ACC/PRI	
06/19/07	HOLLEN	NTFY/ASG	
10/10/07	HOLLEN		08/30/08
10/10/07	MILLIM02	ACC/ASG	
08/21/08	HOLLEN		12/04/08
11/17/08	MILLIM02	AWAIT/C	
11/19/08	HOLLEN	COMPLETE	

PERFORMED BY HYDROLOGY EXPERT AND IDENTIFY ANY ADDITIONAL ACTIONS DEEMED NECESSARY FROM THIS EVALUATION.

Assignment Attribute Value Reqd Date  
BENEFIT REALIZED N  
Name :

Assignment Attribute Value Reqd Date  
1 UNIT/SECT EVALUATR N  
Name :

Assignment Attribute Value Reqd Date  
1A COMMITTED N  
Name :

Assignment Attribute Value Reqd Date  
1B CHANGE BASIS PLEASE EXTEND N 08/20/08  
Name : MICHAEL MILLINOR

AR 236389 5  
Please extend until 12/4/08. Groundwater screening points are currently being installed in this area and the report from the hydrology experts will not be available until the 4th quarter 2008.  
There are no nuclear safety issues associated with groundwater related to this AR and there is no additional risk associated with extending this AR as it does not impact any SSC or other nuclear safety related component. Document evaluation for any long term potential impact performed by hydrology expert and identify any additional actions deemed necessary from this evaluation  
To perform this evaluation new ground water monitoring wells will need to

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be installed in the area of Manhole 2-MH-2SE. These wells are scheduled to be installed in June 2008.

This action needs to be extended to 8/30/08.

This action needs to be re-assigned to Mike Millinor per E&C Superintendent Jerry Johnson.

Assignment Attribute Value	Reqd Date
2 MISCELLANEOUS	N
Name :	

Assignment Attribute Value	Reqd Date
2A COMMENTS	Y
Name : NANCY	HOLLEY
	N 10/07/08

10/07/08: Per authorization from DSO this action was determined to be Long Term Corrective Action (LTCA). See below e-mail message:

Nancy,  
Here is the response from Mike Annacone giving approval to making CORR's 1, 2, 3, 4, 7, and 8 listed below Long Term Corrective Actions. If you could, let me know what our starting average age and ending average age for CORR's are once these changes are made. I took this action from the NCR review yesterday and Jerry also has some CAP actions were this data would be helpful.

Thanks,  
Jeremie Varnam  
Environmental & Chemistry - Sr. Specialist  
Progress Energy - Brunswick Nuclear Plant  
Phone: (910) 457-3197  
Pager: (910) 412-0060  
jeremie.varnam@pgnmail.com

\*\*\*\*\*  
\*\*\*\*\*From: Annacone, Michael J.  
Sent: Tuesday, October 07, 2008 11:26 AM  
To: Varnam, Jeremie  
Cc: Westbrook, John  
Subject: RE: E&C CORL/CORR/CAPR Backlog Reduction  
Jeremie,

I am ok with making items 1, 2, 4, 7, and 8 LTCA's as they are tied to PRG funded projects.

I am ok with making item 3 a LTCA as it is tied to action outside of BNP (NRR), and we have no control over the timing of their work.

Please have your unit evaluator process the above changes.

Thanks,  
Mike

\*\*\*\*\*  
\*\*\*\*\*From: Varnam, Jeremie  
Sent: Tuesday, October 07, 2008 8:13 AM  
To: Annacone, Michael J.; Johnson, Jerry  
Subject: E&C CORL/CORR/CAPR Backlog Reduction

Below is a list of outstanding CORR's owned by Environmental and Chemistry. Please review these items and the comments to see if they are candidates for Long Term Corrective Actions (LTCA) or closure to action plans.

1. Document Evaluation For Any Long Term Potential Impact (00236389-05 CORR 475days): This item is tied to the well installation project for the Protected Area and the ensuing hydrology study project as part of extent of condition for Tritium Recovery.
2. Tritium Identified in Manhole MH-4 (00236389-06 CORR 355days): This item is tied to the well installation project for the Protected Area and the ensuing hydrology study project as part of extent of condition for Tritium Recovery.

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3. Account For The SDSP Evaporation Pathway In The Open (00233857-09 CORR 347days): This item cannot be completed until input is received from the NRR. Actual completion date is tentatively scheduled for 4/30/09.
4. Secure Any Known Path of Sodium Hypochlorite From (00245126-05 CORR 297days): ECR 10229 has been approved. This project is ranked #9 on the Plant's Top Ten Plant Health items and has been approved by PRG.
5. Restore U2 Reactor Water Sulfate Concentration Below (00271485-05 CORR 175days): Can this item be closed to the open action plan that is on the Operational Focus List to drive resolution.
6. Develop Qualification Method for Oil and Grease Analysis (00236171-19 CORL 242days): Can this CORL be close to an action plan to develop and implement the procedure and analysis.
7. Update Hydro-Geological Studies of Plant Backfill (00233865-30 CORR 396days): This item is tied to the Storm Drain Stabilization Pond Tritium recovery project and the associated protected area well installation project.
8. Complete Sampling Profile of Storm Drain Catch Basin (00268357-40 CORR 150days): This item is tied to the Storm Drain Stabilization Pond Tritium recovery project and the associated protected area well installation project.

Thanks,  
Jeremie Varnam  
Environmental & Chemistry - Sr. Specialist  
Progress Energy - Brunswick Nuclear Plant  
Phone: (910) 457-3197  
Pager: (910) 412-0060  
jeremie.varnam@pognmail.com

Assignment Attribute Value	Reqd Date
2B COMMENTS	N
Name :	

Assignment Attribute Value	Reqd Date
2C COMMENTS	N
Name :	

Assignment Attribute Value	Reqd Date
2D COMMENTS	N
Name :	

Assignment Attribute Value	Reqd Date
2E COMMENTS	N
Name :	

Assignment Attribute Value	Reqd Date
3A LTCA APPROVAL	N
Name :	

Assignment Attribute Value	Reqd Date
3B LTCA CONCURRENCE	N
Name :	

COMPLETION NOTES

CAUSE/ACTION

ACTION REQUEST 00236389

ASSIGNMENT COMPLETION APPROVAL

Route List: 001

Route List Initiator: MILLIM02

Alert	Send	Send	Action	Action
PASSPORT Fac Group/Type Last Name	Date	Time	Taken	Date/Time
JOHNSJ03 BNP ERCCSUPT A JOHNSON JR.	11/17/08	13:09	APPROVED	11/18/08 06:24
HOLLEN BNP ERCUEVAL A HOLLEY	11/18/08	06:24	APPROVED	11/19/08 13:53

ACTION REQUEST 00236389

ASSIGNMENT NUMBER 06 SUB

Type : CORR Due Date : 12/31/08  
Status : COMPLETE Reschedule : 3 Pri Resp Group: ERCCSUPT  
Assigned To : M MILLINOR Sec Resp Group:  
Subject : TRITIUM IDENTIFIED IN MANHOLE MH-4

Aff Facility: BNP Unit : System :  
UCR : Schedule Ref : LTCA  
Organization: Department : Z84 Discipline :  
Est Manhrs : Est Comp Date :

Assignment Status History

Updated Date	Updated By	Assgn Status	Assgn Due Date
10/17/07	PETRUD	INPROG	12/20/07
10/17/07	PETRUD	NTFY/ASG	
10/17/07	PETRUD	NTFY/PRI	
10/17/07	PETRUD	ACC/PRI	
10/17/07	PETRUD	NTFY/ASG	
10/17/07	MILLIM02	ACC/ASG	
12/18/07	HOLLEN		06/30/08
06/21/08	HOLLEN		11/06/08
11/06/08	HOLLEN		12/31/08
11/19/08	MILLIM02	AWAIT/C	
11/19/08	HOLLEN	COMPLETE	

EVALUATE CONDITIONS AND IDENTIFIY ANY ADDITONAL ACTIONS  
NEEDED BASED ON REPORT FROM THE HYDROLOGICAL EXPERTS.

Assignment Attribute Value Reqd Date  
BENEFIT REALIZED N  
Name :

Assignment Attribute Value Reqd Date  
1 UNIT/SECT EVALUATR N  
Name :

Assignment Attribute Value Reqd Date  
1A COMMITTED N  
Name :

Assignment Attribute Value Reqd Date  
1B CHANGE BASIS PLEASE EXTEND N 12/18/07  
Name : MICHAEL MILLINOR

11/5/08: Please extend until 12/31/08. Wells have been installed in the area of MH-4, but the report from the hydrologists is not yet available. Data is currently being collected to generate the report. This item involves groundwater wells being installed in the environment in areas outside the plant. This item has no affect on plant equipment or no impact on nuclear safety. Please extend to 6/30/08 as the hydrologists have been unable to evaluate the area. Current plans are to initiate evaluation in January 2008 with recommendations available by the end of the 2nd quarter 2008

ACTION REQUEST 00236389

06/20/08: Please extend until 11/6/08. Wells have been installed in the area of MH-4, but the report is not yet available. Data is currently being collected to generate the report.

This item involves groundwater wells being installed in the environment in areas outside the plant. This item has no affect on plant equipment or no impact on nuclear safety.

Please extend to 6/30/08 as the hydrologists have been unable to evaluate the area. Current plans are to initiate evaluation in January 2008 with recommendations available by the end of the 2nd quarter 2008

Assignment Attribute Value	Reqd Date
2 MISCELLANEOUS	N
Name :	

Assignment Attribute Value	Reqd Date
2A COMMENTS Y	N 10/07/08
Name : NANCY HOLLEY	

10/07/08: Per authorization from DSO this action was determined to be Long Term Corrective Action (LTCA). See below e-mail message:

Nancy,  
Here is the response from Mike Annacone giving approval to making CORR's 1, 2, 3, 4, 7, and 8 listed below Long Term Corrective Actions. If you could, let me know what our starting average age and ending average age for CORR's are once these changes are made. I took this action from the NCR review yesterday and Jerry also has some CAP actions were this data would be helpful.

Thanks,  
Jeremie Varnam  
Environmental & Chemistry - Sr. Specialist  
Progress Energy - Brunswick Nuclear Plant  
Phone: (910) 457-3197  
Pager: (910) 412-0060  
jeremie.varnam@pgnmail.com

\*\*\*\*\*  
\*\*\*\*\*From: Annacone, Michael J.  
Sent: Tuesday, October 07, 2008 11:26 AM  
To: Varnam, Jeremie  
Cc: Westbrook, John  
Subject: RE: E&C CORL/CORR/CAPR Backlog Reduction

Jeremie,  
I am ok with making items 1, 2, 4, 7, and 8 LTCA's as they are tied to PRG funded projects.

I am ok with making item 3 a LTCA as it is tied to action outside of BNP (NRR), and we have no control over the timing of their work.  
Please have your unit evaluator process the above changes.

Thanks,  
Mike  
\*\*\*\*\*  
\*\*\*\*\*From: Varnam, Jeremie  
Sent: Tuesday, October 07, 2008 8:13 AM  
To: Annacone, Michael J.; Johnson, Jerry  
Subject: E&C CORL/CORR/CAPR Backlog Reduction

Below is a list of outstanding CORR's owned by Environmental and Chemistry. Please review these items and the comments to see if they are candidates for Long Term Corrective Actions (LTCA) or closure to action plans.

1. Document Evaluation For Any Long Term Potential Impact (00236389-05 CORR 475days): This item is tied to the well installation project for the Protected Area and the ensuing hydrology study project as part of extent of condition for Tritium Recovery.

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Thanks,  
Jeremie Varnam  
Environmental & Chemistry - Sr. Specialist  
Progress Energy - Brunswick Nuclear Plant  
Phone: (910) 457-3197  
Pager: (910) 412-0060  
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Assignment Attribute Value	Reqd	Date
2B COMMENTS	N	
Name :		

Assignment Attribute Value	Reqd	Date
2C COMMENTS	N	
Name :		

Assignment Attribute Value	Reqd	Date
2D COMMENTS	N	
Name :		

Assignment Attribute Value	Reqd	Date
2E COMMENTS	N	
Name :		

Assignment Attribute Value	Reqd	Date
3A LTCA APPROVAL	N	
Name :		

Assignment Attribute Value	Reqd	Date
3B LTCA CONCURRENCE	N	
Name :		

ACTION REQUEST 00236389

COMPLETION NOTES

CAUSE/ACTION

ASSIGNMENT COMPLETION APPROVAL

Route List: 001

Route List Initiator: MILLIM02

Alert	Send	Send	Action	Action
PASSPORT Fac Group/Type Last Name	Date	Time	Taken	Date/Time
JOHNSJ03 BNP ERCCSUPT A JOHNSON JR.	11/19/08	13:35	APPROVED	11/19/08 13:42
HOLLEN BNP ERCUEVAL A HOLLEY	11/19/08	13:42	APPROVED	11/19/08 13:52

ATTACHMENT 3  
Sheet 1 of 2  
**ADVERSE CONDITION INVESTIGATION FORM**  
Form CAP-NGGC-0200-3-18

**Action Request Number:** 236389      **Investigator:** Mike Millinor

**1. Adverse Condition Description**

Tritium has been identified in manhole 2-MH-2SE. The tritium activity was 1.949E-5  $\mu\text{Ci/ml}$  (19,490 pCi/L). The approximate location of the manhole is in the vicinity of the stack and the intake structure.

**2. Investigation Summary**

- **What Should Be:** This is the first time this manhole was analyzed for tritium. Even though there have been several manholes identified with tritium at the plant, it is not the norm for tritium to be found in manholes.
- **What Is:** Discussions with the engineer who performed the inspection in the manhole indicate that the tritiated water found in the manhole was groundwater. Tritium is not normally expected to be found in manholes even though there have been several manholes identified with tritium. However, the site hydrology as it is currently understood indicates that groundwater inside the backfill area at the site moves toward the intake canal.
- **How it happened:** It appears to be historical and it is unknown at this time as to how the tritium entered the groundwater in this area.
- **Why it happened:** It appears to be historical and it is unknown at this time why tritium entered the groundwater. The immediate area hydrology will have to be verified to determine if this is a current component leak or historical movement of existing groundwater containing tritium is moving towards the area.

**3. Corrective Action Plan**

ATTACHMENT 3  
 Sheet 2 of 2  
**ADVERSE CONDITION INVESTIGATION FORM**  
 Form CAP-NGGC-0200-3-18

**Corrective Action Plan**

	DESCRIPTION	CAUSE	CODE	ORG	CORRECTIVE ACTION	ASSIGNMENT TYPE *	ASSIGNEE/ CONCURRENCE	DUE OR COMPLETION DATE**
ADVERSE CONDITION	Tritium was identified in water in manhole 2-MH-2SE that is coming from groundwater.	N/A	N/A	N/A	Have hydrologists evaluate groundwater in area for tritium source determination.	CORR	Marty McGowan/Jerry Johnson	11/20/07
N/A or: EQ Malfunction	There is no known current equipment malfunction or inappropriate act associated with the current situation. Item appears to be historical.	Cannot determine due to historical in nature	L1	N/A	None  Document evaluation for any long term potential impact	N/A  CORR	N/A  M. McGowan	N/A  10/17/07
OTHER	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\*Designate which assignments are Long Term Corrective Action (non-outage related LTCA requires approval by DSO – Manager PE&RAS for corporate).

\*\*Provide justification for corrective actions with initial due date that exceeds 120 days.

Discussions held by the hydrology experts on 11/17/08 indicate, based on the hydrology work performed in the protected area, that there are no long term impacts to the area from the tritium in this manhole. The groundwater in the area is moving towards the intake canal as expected and no additional actions are necessary.

The tritium in this manhole was discussed with the hydrology experts. Several wells have been installed in this area (area 11) and are not indicating tritium. The tritium in this manhole appears to be coming from an up gradient manhole where there are significant concentrations of tritium. The tritium in this case is being transported by interconnected conduits to this manhole. Per the hydrologists there are no other actions necessary related to the tritium in this manhole.