CP&L

Carolina Power & Light Company

September 19, 1979

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USNRC REGION II
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Mr. James P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

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

Dear Mr. O'Reilly:

Brunswick Steam Electric Plant has reviewed IE Inspection Report 50-324/79-25 and 50-325/79-26 and finds that it does not contain any information of a proprietary nature.

The report identified two items which appear to deviate from NRC requirements. Those two items and Carolina Power & Light Company's response are addressed in the following text:

Infraction:

As required by Technical Specification 6.8.1, written procedures shall be established, implemented and maintained covering activities referenced in Appendix A to Regulatory Guide 1.33. Appendix A to Regulatory Guide 1.33 requires procedures for control of radioactivity. Section 6.5.1 of the Radiation Control and Protection Manual states that an individual entering a Radiation Control Area must wear the proper clothing and devices necessary for contamination control. Section 6.5.3.2 of the Radiation Control and Protection Manual states that lab coats shall be worn in the Contamination Area when required.

Contrary to the above, on July 24, 1979, two Auxiliary Operators entered a Contamination Area in the Reactor Building, which required lab coats for entry, without a lab coat.

Carolina Power & Light Company's Response:

The persons involved were personally counseled by the Shift F[illegible] on the requirements to review the "requirements for entry" p[illegible] each posted area and the possible consequences of failing to c[illegible] This was then discussed with the entire staff, and they were in[illegible] of these requirements and cautions. A statement was placed in the Operations daily Night Orders book, which is required reading

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for all Operations personnel, to read and note the "entry requirements" before entering a posted area. Full compliance has been achieved on this item.

Infraction:

As required by 10 CFR 50 Appendix B, Criteria V, activities affecting quality shall be prescribed by documented instructions and procedures of a type appropriate to the circumstances. ANSI 18.7-1972 as committed to by the CP&L Quality Assurance Program, requires that instructions be included, or referenced in procedures for returning equipment to its normal operating status.

Contrary to the above, on July 24, 1979, PT 15.1 Standby Gas Treatment System, PT 15.2.1 HEPA Filter Efficiency and PT 15.2.2 Charcoal Leak Test, did not have instructions for returning the equipment to its normal operating status.

Carolina Power & Light Company's Response:

PT 15.1 was revised on August 1, 1979, to include provisions for returning the system to standby readiness. This revision also incorporated the requirements of PT 15.2.1 and PT 15.2.2 into PT 15.1. All other PT's have been reviewed to ensure that they are in compliance with ANSI 18.7-1972. Full compliance has been achieved on this item.

Yours very truly,

H. R. Banks
Manager
Nuclear Generation

RMP/CSB:jga*

cc: Mr. V. Stello

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