

CP&L

Carolina Power & Light Company

Brunswick Nuclear Project
P. O. Box 10429
Southport, NC 28461-0429
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10CFR2.201

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

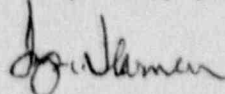
BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Gentlemen:

The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/89-31 and 50-324/89-31 and finds that it does not contain information of a proprietary nature.

This report identified two items that appear to be in noncompliance with NRC requirements. Enclosed is Carolina Power & Light Company's response to this violation.

Very truly yours,



J. L. Harness, General Manager
Brunswick Nuclear Project

BLH/mcg

Enclosure

cc: Mr. S. D. Ebnetter
Mr. E. G. Tourigny
BSEP NRC Resident Office

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VIOLATION A

10CFR50.54(q) requires that nuclear power reactor licensees follow and maintain in effect Emergency Plans which meet the requirements of 10CFR50.47(b). Technical Specification 6.8.1.e requires, in part, that written procedures shall be implemented and maintained covering the Emergency Plan implementation.

Section 6.1 of the Brunswick Emergency Plan states the training program provides initial training and annual retraining of the emergency response organization. The specific training requirements for emergency response personnel are defined in Section 3.0 of Plant Emergency Procedure 04.3, and Section 4.0 of Training Instruction 306.

Contrary to the above, individuals were assigned to the emergency organization that were not trained in accordance with Attachment 1 of Training Instruction 306, or Section 3 of Plant Emergency Procedure 04.3.

This is a Severity Level IV violation (Supplement VIII).

RESPONSE

I. Admission or Denial of the Alleged Violation

CP&L acknowledges that individuals were assigned to the emergency organization that were not trained in accordance with the stated procedure/instruction.

II. Reason for the Violation

Section 6.1.1 of the Brunswick Emergency Plan ensures training of those individuals who may be called to respond to an emergency at the Brunswick plant by providing initial and annual refresher training and retesting on the scope and content of the plan and procedures which implement the plan. TI-306, Attachment I, indicates the required training for various emergency response positions.

As indicated above, several individuals have been identified as not having the required Emergency Plan training. A formal program for tracking and scheduling individuals for training was under development but not fully implemented. Specific causes for individuals who did not have the required training are as follows:

- a. Errors in the Training matrix for the STAs (i.e., SEC listed as being required).
- b. Recent organization changes in Operations.
- c. Individuals whose training had become overdue.

III. Corrective Steps Which Have Been Taken

1. An Emergency Response Organization audit has been initiated to determine individuals needing training and to ensure that their training is updated. Each operating shift has been reviewed to determine that qualified personnel are available to fill required emergency response positions.
2. The Specialist - Emergency Preparedness is now receiving a list from the Personnel Department on new employees and transfers within CP&L for purposes of maintaining the tracking system current.

IV. Corrective Steps to be Taken and Date of Full Compliance

The Emergency Preparedness personnel, working with the Brunswick Training Unit, has identified a more dependable method of scheduling and tracking Emergency Plan Training and is currently finalizing the program. To ensure training is completed as required, the Brunswick Training Unit will assume responsibility to schedule and track the Emergency Plan training using the Nuclear Education Training System by January 11, 1990. This process will provide sequential "flagging" of personnel as they approach expiration of current qualification to allow retraining prior to expiration.

As noted in III.1, an audit has been initiated to verify qualifications for the Emergency Response Organization. By January 11, 1990, the audit will be complete and appropriate Unit Manager's will be notified of personnel in their unit needing training. Training will be conducted as appropriate to ensure the Emergency Response Organization maintains desired staffing needs.

VIOLATION B

10CFR50.54(q) requires that nuclear power reactor licensees follow and maintain in effect Emergency Plans which meet the requirements of 10CFR50.47(b). Technical Specification 6.8.1.e requires, in part, that written procedures shall be implemented and maintained covering Emergency Plan implementation.

Section 3.5 of the Brunswick Emergency Plan addresses notification and activation of the on-site and off-site emergency response organization. Section 6.3 of Plant Emergency Procedure 02.6.21, Emergency Communicator, details the Control Room activities regarding notification responsibilities. According to Section 6.3.1, follow-up notifications should be made at 60-minute intervals or more frequently if warranted by changing conditions.

Contrary to the above, on June 17, 1989, the licensee declared an Unusual Event and made initial notifications to authorities, but failed to make a follow-up notification for two hours.

This is a Severity Level IV Violation (Supplement VIII).

RESPONSE

I. Admission or Denial of the Alleged Violation

CP&L acknowledges that we failed to make timely follow-up notification.

II. Reason for the Violation

PEP-02.6.21, Emergency Communicator, details the Control Room activities regarding notification responsibilities. According to Section 6.3.1, follow-up notifications should be made at 60-minute intervals or more frequently if warranted by changing conditions.

Contrary to the above, on June 17, 1989, the licensee declared an Unusual Event and made initial notifications to authorities but failed to make a follow-up notification for two hours. The Control Room staff did not make the notification because they interpreted the procedure step as a suggestion rather than a requirement.

III. Corrective Steps Which Have Been Taken and Results Achieved

PEP-02.6.21 has been revised to indicate that follow-up notifications "shall" be made at 60-minute intervals or more frequently if warranted by changing conditions.

A special one-hour training session has been provided to each Operations shift by the Emergency Preparedness staff. The training included a description of the procedure revisions and a review of similar problems in this area during past drills and events. Time was also given to enhance the operator's awareness of actions that would be taken by off-site agencies and the need for timely notifications.

Since the completion of the above training, we have made accurate and timely notifications during a drill on September 18, 1989, an Unusual Event on September 20, 1989, and an Alert on September 21, 1989.

IV. Corrective Steps to be Taken and Date of Full Compliance

No further actions required.