

October 12, 1981

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To: C.A. Julian

From: Jim McQueen

Mr. James P. O'Reilly, Director
United States Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, GA 30303

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

Dear Mr. O'Reilly:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 50-324/81-20 and 50-325/81-20 and finds that it does not contain any information of a proprietary nature.

The report identified three items that appear to be in non-compliance with NRC requirements. These items and Carolina Power & Light Company's (CP&L) response to each are addressed in the following text:

Violation A: (Severity Level IV)

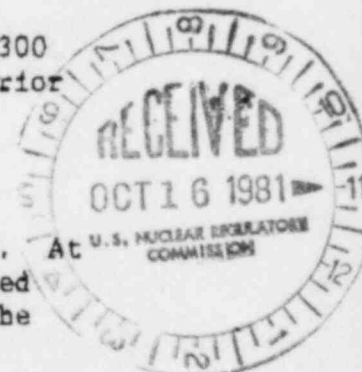
Technical Specification Appendix B, Section 3.5.1.b, requires that prior to release of each batch of liquid waste, a sample shall be taken from that batch and analyzed for principal gamma emitters.

Contrary to the above, an inadvertent release of approximately 300 gallons was made from the "B" floor drain sample tank without prior sampling for gross activity.

CP&L's Response:

CP&L acknowledges that this was a violation of NRC requirements. At 1154 hours on August 6, 1981, it was discovered that an unplanned release of floor drain sample tank (FDST) B was in progress. The release was immediately terminated.

A release form to release FDST A was requested and received from Chemistry during the morning of August 6, 1981. The release form indicated that the activity of FDST A was 3×10^{-5} $\mu\text{C}/\text{ml}$ and that the release rate was to be <174 gpm. The radwaste operator reviewed the release form and at 1152 hours erroneously lined up and commenced releasing FDST B. While logging the initiation of this release, he



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realized his error and immediately secured the release and notified the Shift Operating Supervisor. A review of the flow charts and the tank volume recorder indicated that approximately 300 gallons had been inadvertently released.

Liquid samples taken from FDST B were analyzed by Chemistry and the tank activity was determined to be 1.6×10^{-5} $\mu\text{C}/\text{ml}$, which was less than the approved activity release in FDST A. A review of the radwaste effluent radiation monitor, which monitored the entire release, indicated that the background was 800-900 cps, the trip setpoint was 1100 cps, and the highest reading was 1000 cps. This information indicates that this event did not affect the health or safety of the public.

To prevent occurrences of this nature in the future, several actions are being taken. The operator involved with this event has been counseled. Also, RC&T Procedure 2010 will be revised to require two independent lineup verifications on the radwaste control panel prior to the release of FDSTs, waste sample tanks (WSTs), and detergent drain tanks (DDTs). The control switches on the control board for the WSTs' and the FDSTs' outlet valves will be replaced with key lock switches with different keys required for the A and B tanks. These keys will be controlled by the Control Room Shift Foreman. The manual outlet valves on DDTs A and B will be chained and locked with keys controlled by the radwaste control operator. These changes will be completed by December 31, 1981.

Violation B: (Severity Level V)

Technical Specification 6.8.3 requires that temporary changes to procedures be reviewed by the PNSC within 14 days of implementation.

Contrary to the above, temporary changes to PT-A3, Rev. 0, and OP-50.1, Rev. 13, were approved by the PNSC in 16 and 17 days, respectively.

CP&L's Response:

CP&L acknowledges that this was a violation of NRC requirements. The temporary changes to PT-A3 and OP-50.1 were attached to the back of another temporary procedure change with a later approval date as a group to be taken to PNSC. When the top temporary change was brought to PNSC, it was discovered that the two accompanying temporary changes had exceeded the 14-day requirement.

To correct these problems, a person in the Operations Unit will be tasked with tracking of all temporary revisions and ensuring that they are properly reviewed in the required time frame. This tracking system will be in place by October 15, 1981. Also, Operations personnel have been cautioned to ensure that they understand the requirements for the 14-day review by PNSC and the General Manager.

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Violation C: (Severity Level V)

Technical Specification 6.8.1.a, requires that written procedures shall be established, implemented and maintained. Administrative procedure 5.5.3.g, requires that, following approval of a procedure revision, the Administrative Supervisor shall direct incorporation of the approved revision into the Operating Manual. Emergency Instruction EI-29, Plant Shutdown from Outside Control Room, requires five copies of the procedures to be kept at the remote shutdown panel.

Contrary to the above, the EI-29 procedures at the Unit 2 remote shutdown panel on May 27, 1981, were not the current Revision 8 approved April 3, 1981.

CP&L's Response:

CP&L acknowledges that this was a violation of NRC requirements. No system exists at the Brunswick site to incorporate revisions to the plant Operating Manual in copies which are not controlled copies. All controlled copies of EI-29 were reviewed and did contain the proper revision. The five copies of EI-29 at the remote shutdown panel were corrected to reflect Revision 8.

The Brunswick site is currently reviewing its procedures to determine which ones require copies in remote locations. Once these copies are identified, they will be placed on the controlled copies list to ensure that any revision to a given procedure will be incorporated in its remote copy. This review and the controlled copy list update will be completed by November 30, 1981.

Yours very truly,

B. J. Furr

B. J. Furr
Vice President
Nuclear Operations

RMP/JAM/lr (4169)

cc: Mr. R. A. Hartfield
Mr. V. Stello, Jr.

B. J. Furr, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

Franklin Murray
Notary (Seal)

My commission expires: October 4, 1986

