CP&L

Carolina Power & Light Company

Brunswick Nuclear Plant
P. O. Box 10429
Southport, N.C. 28461-0429

JUL 30 1993

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

BRUNSWICK NUCLEAR PLANT UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

The Brunswick Nuclear Plant (BNP) has received NRC Inspection Report 50-325/93-28 and 50-324/93-28 and finds it does not contain information of a proprietary nature. This report included a Notice Of Violation.

Enclosed is Carolina Power & Light Company's response to that Notice Of Violation.

Very truly yours,

CS Hinnant

C. S. Hinnant, Director Site Operations
Brunswick Nuclear Plant

SFT/

Enclosure

cc: Mr. S. D. Ebneter
Mr. P. D. Milano
BSEP NRC Resident Office

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ENCLOSURE

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 and 2
NRC DOCKET NOS. 50-325 & 50-324
OPERATING LICENSE NOS. DPR-71 & DPR-62
REPLY TO NOTICE OF VIOLATION

VIOLATION A:

Technical Specification (TS) 6.8.1, requires that written procedures shall be established, implemented, and maintained covering the activities in the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. Appendix "A" of Regulatory Guide 1.33, Section 7.e.(1), requires procedures for Access Controls to Radiation Areas Including a Radiation Work Permit System.

Environmental And Radiation Control Procedure, 0-E&RC-0352, Use of the ALNOR Dosimetry System, Revision 2, dated May 1, 1992, Step 10.3.2.3, states that the Radiation Control staff is responsible for assigning use of alarming dosimeters only when the work environment is suitable for their use and when the users have been instructed in proper use of the dosimeters and can be trusted to use the dosimeters as instructed.

Contrary to the above, on May 17, 1993, an auxiliary operator, not a member of the radiation control staff assigned an alarming dosimeter to another individual for use in accessing posted high radiation areas.

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

RESPONSE TO VIOLATION A:

Admission or Denial of Violation

CP&L admits the violation.

Reason for Violation

Operations personnel inappropriately issued an Alnor digital alarming dosimeter to non-operations personnel as a result of the failure to develop and implement adequate programmatic controls. In 1991, Alnor dosimeters were provided for self-issue exclusively to Operations personnel for their convenience and as a radiation safety program enhancement. Although appropriate training was provided when this practice was initiated, provisions were not made to periodically monitor Operations use of these instruments or to reinforce program requirements.

Corrective Actions Which Have Been Taken and Results Achieved

The practice of permitting Operations personnel to self-issue Alnor dosimeters has been suspended indefinitely. The Radiation Control (RC) staff issues all alarming dosimeters to the site workforce which includes Operations. Prior to issuing an alarming dosimeter, RC personnel ensure that workers, including operators, have an adequate understanding of the alarming dosimeter's settings and use.

Auxiliary Operator training has been conducted to stress the precautions, limitations, and use of alarming dosimeters.

Corrective Steps Which Will Be Taken to Avoid Further Violations

A review of this event will be performed in E&RC Third Quarter Continuing Training.

Operations Shift Supervisors will brief operators on this event, emphasizing the following:

Radiological instruments are issued by RC staff only

Each operator is responsible for having a thorough understanding of the operation and function of any instrument or tool used, including radiation survey instruments.

Date When Full Compliance Will Be Achieved

CP&L is in full compliance.

VIOLATION B:

10 CFR 19.12, Instruction to Workers, states, in part, that all individuals working in or frequenting any portion of a restricted area shall be kept informed of radiation in such portions of the restricted area, and in precautions and procedures to minimize exposure, and in the purposes and functions of protective devices employed.

Contrary to the above, on May 17, 1993, Operations personnel were not adequately informed of the purposes and functions of the digital alarming dosimeter, a protective device employed to minimize exposure.

RESPONSE TO VIOLATION B:

Admission or Denial of Violation

CP&L admits the violation.

Reason for Violation

Operations personnel did not clearly understand the purpose and functions of the digital alarming dosimeter due to a failure to develop and implement adequate programmatic controls. In 1991, Alnor dosimeters were provided for self-issue exclusively to Operations personnel for their convenience and as a radiation safety program enhancement. Although appropriate training was provided when this practice was initiated, provisions were not made to periodically monitor Operations use of these instruments or to reinforce program requirements.

Corrective Actions Which Have Been Taken and Results Achieved

The practice of permitting Operations personnel to self-issue Alnor dosimeters has been suspended indefinitely. The Radiation Control staff issues all alarming dosimeters to the site workforce which includes Operations. Prior to issuing an alarming dosimeter, RC personnel ensure that workers, including operators, have an adequate understanding of the alarming dosimeter's settings and use.

Auxiliary Operator training has been conducted to stress the precautions, limitations, and use of alarming dosimeters.

Corrective Steps Which Will Be Taken to Avoid Further Violations

A review of this event will be performed in E&RC Third Quarter Continuing Training.

Operations Shift Supervisors will brief operators on this event, emphasizing the following:

Radiological instruments are issued by RC staff only

Each operator is responsible for having a thorough understanding of the operation and function of any instrument or tool used, including radiation survey instruments.

Date When Full Compliance Will Be Achieved

CP&L is in full compliance.