

USNRC REGION **CP&L**  
ATLANTA, GEORGIA

Carolina Power & Light Company

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Brunswick Steam Electric Plant  
P. O. Box 10429  
Southport, NC 28461-0429

September 7, 1982

FILE: B09-13510E  
SERIAL: BSEP/82-1948

Mr. James P. O'Reilly, Director  
U. S. Nuclear Regulatory Commission  
Region II, Suite 3100  
101 Marietta Street N.W.  
Atlanta, GA 30303

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 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:

The Brunswick Steam Electric Plant (BSEP) has received IE Inspection Report 50-324/82-25 and 50-325/82-25 and finds that it does not contain any information of a proprietary nature.

The report identified one item that appears to be in noncompliance with NRC requirements. This item and Carolina Power and Light Company's response is addressed in the following text:

Violation: (Security Level IV)

Technical Specification 6.8.1.a requires that written procedures recommended in Regulatory Guide 1.33, 1972, Appendix A, be implemented and maintained. Appendix A of Regulatory Guide 1.33 recommends general plant operating procedures and system operating procedures. In addition, Technical Specification 6.8.1.f requires fire protection program procedures to be implemented and maintained.

10CFR50, Appendix B, Criterion II, requires that the licensee establish a quality assurance program which shall be documented by written procedures. The accepted quality assurance program (letter dated March 18, 1981, Serial OQA-81-026) states that Brunswick plant complies with the requirements for administrative controls described in ANSI N18.7-1976. ANSI N18.7-1976 requires in paragraph 5.3.2 that procedure content include references, prerequisites, precautions, and checkoff lists.

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Contrary to the above:

1. Operating procedure content does not conform to ANSI 18.7 requirements in that the procedures do not contain references and checkoff lists. In addition, some operating procedures do not contain applicable prerequisites and precautions.
2. General plant operating procedures and system operating procedures have not been maintained in that: the procedures do not adequately complement each other by reference; and the procedures contain numerous errors due to failure to revise the procedures to reflect current plant configurations.

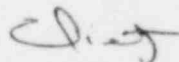
Carolina Power & Light Company's Response

Carolina Power and Light Company acknowledges that this was a violation of NRC requirements. The lack of adequate signoffs in the operating procedures was due to an incorrect interpretation of the ANSI 18.7 requirements during initial procedure development. Administrative deficiencies in the Operations group responsible for procedural reviews and revisions allowed errors to develop and not be corrected.

The plant operating procedures are currently being rewritten to correct identified problems, provide a better format, and add signoffs as required. As this project is expected to take 18 to 24 months to complete, Operating Instruction OI-01, Plant Operating Principles and Philosophy, has been revised to require signoffs on all ECCS and other selected operational systems. The methodology for accomplishing these required signoffs and a listing of those operating procedures requiring them are provided in OI-01. This interim method has been in effect for several weeks and has proven to be functional.

To assure that operating procedures are reviewed and revised as required to reflect plant modifications or changes, an Operations Engineer has been assigned the responsibility for all procedural changes. Not only will this person assure a day-to-day continuity of required procedural changes, but he will also be supervising the rewriting of the OPs, which will guarantee a concatenation of these changes. All the procedural discrepancies identified in the report will be corrected prior to the return to power of either unit, and any future discrepancy will be corrected in a timely manner.

Very truly yours,



C. R. Dietz, General Manager  
Brunswick Steam Electric Plant

RMP/gvc

cc: Mr. R. C. DeYoung