

I. General

Steps have been taken to correct specific weaknesses in the areas of radiation control, contamination control, and environmental protection as identified in non-compliances and escalated enforcement actions referenced below. Licensee corrective actions have been reviewed and onsite inspection performed where necessary. Enforcement conferences were held with senior licensee management to discuss specific problems and corrective actions. Programmatic improvements were made by the addition of a Manager of Environmental and Radiation Control and the reorganization of Quality Assurance functions.

II. Specific

A. Contention

"The Brunswick facility displayed evidence of weaknesses in the areas of radiation control, contamination control, and environmental protection."

The basis, NRC actions, and licensee corrective actions for this contention are discussed in contentions B-F below.

B. Contention

"The inadequate management control over radiation exposure and contamination resulted in unmonitored and uncontrolled release of airborne radioactive material."

1. Basis

On February 22, 1980 a hole in an auxiliary boiler tube resulted in the uncontrolled and unmonitored release of radioactive materials. Evaluation of the event by the licensee indicated that the release had occurred over a period of approximately 12 hours.

Reference

IE Rpt. 50-325/80-12,
and 50-324/80-11

The auxiliary boiler had been contaminated since 1976. The boiler had been decontaminated but was contaminated again in 1978. The licensee had known that the auxiliary boiler was contaminated, but inadequate actions were taken to minimize the release or to collect effluent samples following the February 22, tube rupture.

IE Rpt. 50-325/76-21, 78-

IE Rpt. 50-324/76-22, 78-

LER 78-051

2. NRC Action

Following the inspection of the event, the NRC issued an Immediate Action letter for actions taken or planned to be taken by the licensee. An enforcement con-

IE Rpt. 50-325/80-12,
and 50-324/80-11

NRC letter of 3/28/80
NRC letter of 6/11/80

ference was held on April 15, 1980 to discuss the NRC concerns regarding the release and other management problems of the health physics program. On June 11, the licensee was issued a Civil Penalty in the amount of \$24,000.

These and related topics were discussed at meetings with senior licensee management on May 19, 1980, October 17, 1980, and April 3, 1981. An inspection was conducted on September 2-4, 1980 regarding the licensee's actions contained in the response to the Immediate Action letter and to the Civil Penalty.

IE Rpt. 50-325/80-36,
and 50-324/80-32
licensee letter of 4/22/80
licensee letter of 7/3/80

3. Licensee Corrective Action

The licensee has taken the specific corrective actions contained in the Immediate Action letter and the response to the Civil Penalty. Additionally, a new boiler system was installed to replace the contaminated auxiliary boiler. The licensee has strengthened the facility's Health Physics Program by adding a Manager of Environmental & Radiation Control, who reports directly to the Plant Manager.

licensee letter of 7/3/
IE Rpt. 50-325/80-36, a
50-324/80-33

C. Contention

"Management control weaknesses also resulted in the improper release of licensed material to a sanitary landfill and local salvage dealer."

1. Basis

On April 28, 1980, while conducting a survey of a sanitary landfill where trash from the plant is buried, an inspector identified radiation levels higher than background. Subsequent excavation and surveys identified that the landfill contained materials from the plant which were radioactively contaminated above the plant release limits. An inspection was conducted April 26 - May 16 of the site, burial facilities and scrap yards to identify where materials from the site had been buried or sold.

Reference

IE Rpt. 50-325/80-18,
and 50-324/80-15

2. NRC Action

The NRC issued two Immediate Action letters for actions taken or planned to be taken by the licensee. An enforcement conference was held on May 19 to discuss the NRC concerns regarding the control and release of radioactive material. On August 1, the licensee was issued a Civil Penalty in the amount of \$89,000.

NRC letter of 4/29/81
NRC letter of 5/2/81
IE Rpt. 50-325/80-18,
and 50-324/80-15
NRC letter of 8/1/80

These and related topics were discussed with senior licensee management on October 17, 1980. An inspection was conducted on September 2-4 regarding the licensee's actions contained in the response to the Civil Penalty.

IE Rpt. No. 50-325/80-36
and 50-324/80-33
licensee letter of 5/29/80

3. Licensee Corrective Action

The licensee has taken the specific corrective actions contained in the Immediate Action letters and the response to the Civil Penalty. Additionally, the licensee obtained a permit to operate a sanitary landfill on the plant property.

IE Rpt. 50-325/80-36,
and 50-324/80-33
licensee letter of 8/27/80

D. Contention

"Brunswick management control weaknesses were characterized by numerous noncompliances concerning the quality assurance program (some of which were repetitive), problems in supervisory overview and the conduct of committee activities, and instances of activities conducted without procedures."

1. Basis

Examples of noncompliances concerning the quality assurance program include the failure to establish storage, housekeeping and records measures; operation with an inadequate calibration program; and the failure to perform periodic audits in required areas

Reference

IE Rpt. 50-324/78-30,
79-02, 79-27, 80-39
IE Rpt. 50-325/78-30
79-02, 79-28, 80-42
IE Rpt. 50-400/80-12,
50-401/80-10,
50-402/80-10, and
50-403/80-10

Examples of supervisory overview and conduct of committee activities noncompliances include four occasions on which

IE Rpt. 50-324/78-30,
79-2, 79-4, 79-7, 79-19
79-27, 79-30, 80-10,

the Plant Nuclear Safety committee did not perform its required safety analysis reviews. Supervisory overview of noncompliances also include several instances of late reports to the NRC, failure to perform required safety evaluations and inadequate reviews of periodic tests.

80-11, 80-39
IE Rpt. 325/78-30, 79-2
79-3, 79-7, 79-19, 79-28
79-34, 80-11, 80-12, 80-42

Examples of noncompliances concerning activities conducted without procedures include the calibration of a conductivity meter and a Reactor Core Isolation Cooling system module installation. In addition several instances of inadequate procedure use occurred.

LER 324-80-66
IE Rpt. 50-324/79-2,
79-29, 79-35, 80-5,
80-18, 80-24, 80-37,
80-38
IE Rpt. 50-325/79-2,
79-30, 79-34, 80-5,
80-21, 80-27, 80-40,
80-41

2. NRC Action

Items of noncompliance were issued for the items as detailed in the above references. Followup and overview of licensee actions in this area will be provided by the Resident Inspectors and routine inspections conducted by Region II specialists. These and related topics were discussed at meetings with senior licensee management on October 17, 1980.

3. Licensee Corrective Action

The licensee has corrected or is in the process of correcting those items identified. The licensee recently reorganized the QA functions which should improve performance in this area.

IE Rpt. 50-324/79-2,
79-27, 79-35, 80-10,
81-06
IE Rpt. 50-325/79-2,
79-28, 79-34, 80-19

E. Contention

"The IE performance appraisal team found significant weaknesses in areas involving meangement overview, training and corrective actions."

1. Basis

In the area of management overview, corporate managers were found not to review, on a routine basis, operating records and logs as required. Onsite

Reference

IE Rpt. 50-324/79-19 and
50-325/79-19

supervisors and nonsupervisory personnel did not review all required documents. Additionally, the Plant Nuclear Safety Committee (PNSC) did not perform trend analyses or review events requiring 24-hour reporting. The PNSC did not provide a timely review of Licensee Event Reports. The licensee did not have an offsite review committee.

In the areas of training, the licensee had no formal program to assure that changes in the license, technical specifications, regulations, guides, codes, or standards would result in changes to the training program. Individual supervisor were relied upon to initiate training program changes. No formal program for evaluating the effectiveness of the site and corporate training programs existed.

IE Rpt. 50-324/79-19
and 50-325/79-19

Corporate training requirements were found not to be well defined. Managers and supervisors were, in general, relied upon to identify the training needs of their personnel. On-the-job training was not well documented.

IE Rpt. 50-324/79-19
and 50-325/79-19

Examples of corrective action problems include four examples of a failure to make required reports to the NRC. The program for tracking outstanding items was fragmented with no individual assigned responsibility. Management problems or concerns were identified through an informal (verbal) system, relying primarily on first line supervision to pass concerns to upper management.

IE Rpt. 50-324/79-19,
and 50-325/79-19

2. NRC Action

As a result of this inspection on September 13, 1979 three items of non-compliance and one item of deviation were issued. Additionally, eight unresolved items were identified for followup during future inspections. These and related topics were discussed at meetings with senior licensee management on October 17, 1980.

IE Rpt. 50-324/79-19,
and 50-325/79-19

3. Licensee Corrective Action

By letter dated October 5, 1979 the
the licensee responded to the report
and committed to modify their management
systems to correct the items of noncom-
pliance and the deviation identified.

licensee letter 10/5/79

F. Contention

"However, an Immediate Action Letter was issued concerning inadvertant
release of radioactivity to unrestricted areas."

The basis, NRC actions, and licensee corrective action for this contention
are discussed in contentions B and C above.