

USNRC REGION II
ATLANTA, GEORGIA

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Carolina Power & Light Company

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

October 6, 1982

FILE: B09-13510E
SERIAL: BSEP/82-2177

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 & 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 509-324/82-30 and 509-325/82-30 and finds that it does not contain any information of a proprietary nature.

The report identified two items that appear to be in noncompliance with NRC requirements. These items and Carolina Power & Light Company's response to each are addressed in the following text:

Violation A: (Severity Level V)

Technical Specification 6.8.1.a requires written procedures be implemented for the procedures recommended in Appendix A of Regulatory Guide 1.33 November 1972. Item I.1 of Regulatory Guide 1.33 specifies that maintenance which can affect the performance of safety-related equipment be performed in accordance with written procedures.

Contrary to the above, Technical Specification 6.8.1.a was not met in that a procedure recommended in item I.1 of Regulatory Guide 1.33 Appendix A was not implemented in that on August 5, 1982, safety-related equipment maintenance instruction, MI-10-2J, was not correctly performed. This violation applies to Unit No. 1 only.

Carolina Power & Light Company's Response

Carolina Power & Light Company acknowledges that the failure to follow maintenance instruction MI-10-2J is a violation of NRC requirements. A review of this event indicates that the cause was a failure by the technician to read

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the step being performed in its entirety prior to performing the required actions. The technician was counseled by an incident review committee chaired by the plant General Manager and a memorandum describing the event was placed in the technicians personnel file. Verbatim compliance with procedures has recently been readdressed to all site personnel to reemphasize the Company's philosophy for plant operation. This item is considered closed.

Violation B: (Severity Level V)

Technical Specification 6.8.1.f requires written procedures be implemented for the fire protection program. Fire protection (FP) procedure FP-14, Step III.A, requires inspectors to note, on the attached Data Sheet, any condition which could adversely affect the fire protection status of the area.

Contrary to the above, Technical Specification 6.8.1.f was not met in that FP-14 Step III.A was not properly implemented on July 18, 1982, in that a condition which could adversely affect the fire protection status of the diesel generator area did exist, during the performing of FP-14, and was not noted as required.

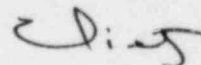
Carolina Power & Light Company's Response

Carolina Power & Light Company acknowledges that the failure to follow the requirements of FP-14 as identified is a violation of NRC requirements.

The inspections being performed in accordance with FP-14 were established to ensure compliance with FP-02, Control of Combustible Materials and Ignition Sources. The purpose of both of these procedures is to ensure combustible material is not loaded anywhere in excess of that location's fire suppression capability. A review of the paper towels around the diesel generator conducted by the plant fire chief determined that the loading did not exceed the extinguishing capability of either the automatic sprinkler system or the standpipe system; therefore a significant safety item did not exist.

A review of FP-14 indicates that it is not adequately written to reflect its intended purpose in that sufficient guidance is not provided regarding the intent of the inspection. The procedure now requires that any flammable item found in the inspected area be identified as an item which could adversely affect the fire protection status. The procedure is not designed to identify all flammable material in a given building but to identify those items or accumulation of items which constitute a condition adverse to fire protection safety. This procedure will be revised by November 30, 1982, to provide the required guidance.

Very truly yours,



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

RMP/mcg/LETGG

cc: Mr. R. C. DeYoung