

## NOTICE OF VIOLATION

Carolina Power and Light Company  
Brunswick Unit 1 and Unit 2  
Southport, North Carolina

Docket Nos.: 50-325 and 50-324  
License Nos.: DPR-71 and DPR-62

During an NRC inspection conducted on October 1 - November 4, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1 (a) requires that written procedures be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33 Appendix A, November 1972.

Regulatory Guide 1.33, Appendix A, requires procedures for the preparation for refueling, refueling equipment operation, and core alterations; maintenance which can affect the performance of safety related equipment; and for alarm or abnormal conditions.

Plant Administrative Instruction AI 106, Rev. 3, Cleanliness Control for Reactor Refueling Floor, Section 7.8.4 requires that all hand tools and other objects which could fall into fuel racks or bundles (such as screwdrivers, wrenches, flashlights, etc.) shall be attached to a lanyard and secured to the person using the tool or to some rigid attachment in the area.

Civil Modification Procedure, CMP-12, Rev. 0, Excavation and Backfill, Section 3.7.1.1, requires that the Technical Support Electrical Systems Group shall inspect the site, to the best of their ability for any equipment above or below ground, and document this on Attachment 1 prior to work being performed.

Chlorination system operating procedure OP-43.1 requires, under general precautions and limitation 4.3, that personnel responding to a chlorine leak must wear appropriate respiratory equipment (i.e., SCBA or specifically designed respirators).

Contrary to the above requirements, the following are three examples of failure to follow or inadequate procedures:

- 1) On October 26, 1994, the requirements of AI-106 were not implemented when the inspector observed a mechanic working on the spent fuel shipping cask suspended over the spent fuel pool with an unsecured tool and then proceeded to hand the tool to another mechanic who also failed to properly secure the tool.
- 2) On September 26, 1994, CMP-12 was inadequate in that the review performed in Attachment 1 failed to review applicable nuclear service water drawings. Consequently, a backhoe struck nuclear service water piping causing a leak.

- 3) On October 23, 1994, a radwaste operator responded to a chlorination system building leak detector alarm without appropriate respiratory equipment which necessitated his being treated for inhalation of chlorine gas.

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

- B. Technical Specification 6.8.1 (a) requires that written procedures be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33 Appendix A, November 1972.

Regulatory Guide 1.33, Appendix A, requires procedures for maintaining equipment control, procedure adherence, review and approval.

Plant Administrative Instruction AI-58, Rev. 46, Equipment Clearance Procedure, Section 3.4.1 requires the WCC staff to prepare and verify clearance that will ensure safe operating conditions exist while equipment is being cleared, maintained, or returned to service. Additionally, Section 3.7.1 requires the AO to hang or remove authorized clearances by placing equipment in the configuration specified on the clearance tag sheet, observing the order to be hung/restored, being aware of precautions/plant conditions, and following any other instructions provided by the Reactor/Senior Reactor Operator.

Plant Administrative Instruction AI-58.1, Rev. 1, Radwaste-Fire Protection Equipment Clearance Procedure, Section 5.2.9.1.a requires that air operated valves which fail open should not be considered for clearances unless its air supply is isolated, a constant pneumatic supply is connected to the operator or it is forcibly closed with an installed jacking device or gag; the valve, its air supply isolation, and constant pneumatic supply shall be tagged.

Contrary to the above, the following are examples of failure to follow procedures:

- 1) On August 22, 1994, the requirements of AI-58, Section 3.7.1, were not implemented when an AO removing a clearance failed to read and implement the requirements of Special Instruction 4 of Clearance 2-94-1960, and restore switch 2-CW-S1 to the normal position on removal of the clearance.
- 2) On September 30, 1994, the requirements of AI-58, Section 3.4.1, were not implemented during the performance of work associated with clearance 1-94-2146, it was identified that all the power had not been removed from the cables being manipulated, as determined by an arc being drawn between the cable and the tray as it was removed.

- 3) On September 30, 1994, the requirements of AI-58.1, Section 5.2.9.1.a, were not implemented when an air operated clearance boundary valve failed to maintain its required closed position resulting in a spill of radioactive resin and water in the radwaste building.

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

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light Company is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia  
this 25th day of November 1994