

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick

Docket Nos 50-325, 50-324
License Nos. DPR-71, DPR-62

During the Nuclear Regulatory Commission (NRC) inspection conducted on March 9-13, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violation is listed below:

10 CFR 50.54(g) requires that nuclear power reactor licensees follow and maintain in effect Emergency Plans which meet the requirements of 10 CFR 50.47(b). Technical Specification 6.8.1.e requires, in part, that written procedures be established, implemented, and maintained covering Emergency Plan implementation.

Section 6.1.1 of the Brunswick Emergency Plan states that the Emergency Plan Training Program provides for initial training and annual refresher training of emergency response organization personnel. The specific training requirements for emergency response personnel are defined in Plant Emergency Procedure (PEP) 04.3, Health Physics Instruction RC-EM-6, and Training Instruction (TI) 306.

Section 3.1.8 of PEP-04.3, Revision 8, dated March 23, 1988, requires that Environmental and Radiation Control personnel receive initial and periodic retraining in first aid.

Section 6.1 of RC-EM-6, Revision 6, dated March 26, 1991, requires that members of the Corporate emergency response staff receive annual training commensurate with their emergency position.

Appendix 1 of TI-306, Revision 2, August 2, 1991, requires that Radiological Control Technicians and Environmental and Chemistry Technicians receive MultiMedia First Aid Training, and that the EOF Environmental Monitoring Team receive training provided by the Corporate staff.

Contrary to the above, during the week of March 9-13, 1992, emergency response organization personnel were identified that were not trained in accordance with the applicable procedural training and retraining requirements as follows:

1. Nine Environmental and Radiation Control Technicians were identified whose training in MultiMedia First Aid had expired. Specifically, the retraining frequency for these individuals exceeded the Red Cross three year training criteria required to maintain qualification. Expiration for the identified individuals ranged from less than one month to thirteen months.
2. An individual designated to fill the position of Environmental Supervisor/Environmental Field Coordinator in the Emergency Operations Facility had not received the Sea Breeze training course required for this position in the organization.

This is Severity Level IV repeat violation (Supplement VIII).