



Carolina Power & Light Company

Brunswick Nuclear Project
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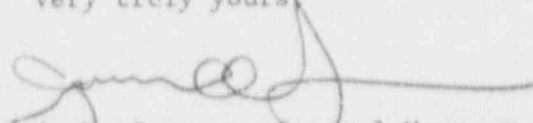
BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 & 2
DOCKET NOS. 50-325 & 50-324
LICENSE NOS. DPR-71 & DPR-72
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

The Brunswick Steam Electric Plant (BSEP) has received NRC Inspection Report 50-325/92-06 and 50-324/92-06 and finds that it does not contain information of a proprietary nature. This report included a Notice Of Violation.

Enclosed is Carolina Power & Light Company's response to that Notice Of Violation.

Very truly yours,



J. W. Spencer, General Manager
Brunswick Nuclear Project

RSK/

Enclosure

cc: Mr. S. D. Ebnetter
Mr. R. H. Lo
BSEP NRC Resident Office

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Violation

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 the 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 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).

Response

I. Admission or Denial of the Alleged Violation

CP&L admits to the violation.

II. Reason for the Violation

CP&L's response to previous Emergency Plan Training violations dating back to 1989 were characterized by investigations performed with a narrow focus. Corrective actions implemented repeatedly addressed only the specific circumstances of the violation. A formal CP&L methodology for a root cause analysis was not available at the time of the 1989 violation response. One of the corrective actions, in response to this violation, was to track completion of Emergency Preparedness training using NETS, but no procedural guidance was established.

A notice of violation was received in October of 1991 in which ninety-three individuals were identified as being delinquent in Emergency Plan training. In response to this notice of violation, a root cause analysis (RCA) (91-473) was prepared that focused heavily on the scheduling and tracking process. Corrective action for this violation resulted in the implementation of several administrative controls to govern the scheduling/tracking process such as:

- a. The development of a procedure [Regulatory Compliance Instruction] (RCI-11.0) to specifically address maintenance of the Emergency Response Organization (ERO).
- b. The creation of a detailed ERO listing.
- c. Procedural guidance for the identification and reporting of upcoming or expired training.
- d. A method to remove delinquent personnel from the ERO.

One item for long term action was to investigate methods to more effectively utilize the Nuclear Education Tracking System (NETS). This item was significant in that a response to a notice of violation in 1989 was to track and schedule E.P. training utilizing NETS. Internal audits conducted in 1989 indicated that utilizing NETS was effective. These audits were not of sufficient scope to identify scheduling difficulties that occurred with the re-training process such as identifying changes in training requirements.

The root cause analysis conducted in April, 1992, concludes that the previously implemented administrative controls have been effective and determined the root cause analysis did not address all aspects of areas needing improvement in the training program. First Aid training was not addressed sufficiently. The March 9-13, 1992 inspection identified nine individuals delinquent in First Aid training and one individual delinquent in Sea Breeze training. The previous root cause analysis did not sufficiently address administrative controls for the three year requirement for First Aid, nor did it evaluate training required by Corporate Training procedures for those individuals who assist the plant. First Aid training was not scheduled, tracked, or audited by the same methodology as other E.P. training courses. In addition, the Emergency Response Organization listing contained the requirement for First Aid, but did not include a verification of the qualifications. The corporate procedure (RCEM-6) did not require that individuals be removed from the roster when training was delinquent.

III. Immediate Actions Taken

1. Personnel with delinquent training were removed from the Emergency Response Organization, re-trained, and placed back on the ERO roster.
2. The on-site Nuclear Assessment Department (NAD) completed a 100% review of plant and corporate training records. This NAD review confirmed the known discrepancies and identified one maintenance foreman needing Operational Support Center (OSC) training. This individual had been scheduled for training prior to the NRC inspection and completed the required training on March 16, 1992 as scheduled.
3. The data base for tracking/auditing of the ERO has been revised to add an additional field for tracking First Aid qualifications.

4. Adverse Condition Report, ACR#92-174 was issued for the nine (9) individuals being delinquent in First Aid. ACR S92-008 was issued for the one individual in corporate H.P. lacking the Sea Breeze modules. Root cause analyses were completed on April 10, 1992.
5. TI-306 "Emergency Plan Training" has been revised to:
 - a. Add F. [redacted] to the scheduling form in TI-306 to ensure consistency with matrix.
 - b. Delete the reference to CPR in the course title.
6. Radiation Control-Environmental Monitoring [RC-EM]-6 has been revised to provide guidance:
 - a. for exempting personnel that is consistent with industry standards.
 - b. to remove individuals from roster when qualifications expire or individual fails training.
7. An individual in the Brunswick Training Unit has been assigned full time responsibility for E.P. training. This was in response to current and previously identified weaknesses in the program.

IV. Corrective Steps to be Taken

NONE

V. Date of Full Compliance

CP&L is in full compliance.

The following actions will further enhance the ERO training program:

Complete a change analysis using the Human Performance Enhancement System (HPES) methodology for the use of NETS at BNP and other CP&L facilities. The use of NETS at other CP&L facilities has been effective for scheduling and tracking E.P. training. We will apply lessons learned to the BNP Training program.

If this methodology is effective, this process will be applied in other areas requiring corrective action.

Complete a comprehensive program effectiveness evaluation of the Emergency Response Organization Training program. This evaluation will include verification of current training requirements, consolidation of the reporting responsibilities for E.P. training, and methods of notifying individuals when they are no longer on the Emergency Response Organization.