



OCT 02 1995

SERIAL: BSEP 95-0514  
10CFR2.201

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62  
REPLY TO A NOTICE OF VIOLATION AND A NOTICE OF DEVIATION  
NRC INSPECTION REPORT NOS. 50-325/95-15 AND 50-324/95-15

Gentlemen:

On September 1, 1995, the Nuclear Regulatory Commission (NRC) issued a Notice of Violation and a Notice of Deviation for the Brunswick Steam Electric Plant, Units 1 and 2. The basis for the violation and deviation are provided in NRC Inspection Report 50-325/95-15 and 50-324/95-15. Carolina Power & Light Company finds the inspection does not contain information of a proprietary nature. Enclosures 1 and 2 provide Carolina Power & Light Company's responses to the Notice of Violation and the Notice of Deviation in accordance with the provisions of 10CFR2.201.

Please refer any questions regarding this submittal to Mr. G. D. Hicks at (910) 457-2163.

Sincerely,

W. Levis, Director-Site Operations  
Brunswick Nuclear Plant

SFT/

Enclosures

1. Reply to Notice of Violation
2. Reply to Notice of Deviation
3. List of Commitments

cc: Mr. S. D. Ebnetter, Regional Administrator, Region II  
Mr. D. C. Trimble, NRR Project Manager - Brunswick Units 1 and 2  
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector  
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

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## ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 and 2  
NRC DOCKET NOS. 50-325 & 50-324  
OPERATING LICENSE NOS. DPR-71 & DPR-62  
REPLY TO NOTICE OF VIOLATION

During an NRC inspection conducted on July 1 - August 4, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995/NUREG-1600), the violation is listed below:

10 CFR 50.70 (b) (4), Inspections, requires that the licensee shall ensure that the arrival and presence of an NRC inspector, who has been properly authorized facility access, is not announced or otherwise communicated by its employees or contractors to other persons at the facility unless specifically requested by the NRC inspector.

Contrary to the above, on August 2, 1995, an NRC inspector while in the control room overheard communication on a portable hand-held radio between plant personnel outside the control room warning of the presence of an NRC inspector in the reactor building.

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

### RESPONSE TO VIOLATION:

#### Admission or Denial of Violation

Carolina Power & Light admits this violation.

#### Reason for Violation

On August 2, 1995, while engaged in cleanup activities of the Unit 1 Reactor Building North Core Spray room sump, the lead person for the activity communicated on a portable hand-held radio with other members of the crew involved with the work that the NRC was in the building. Concurrently, the NRC Senior Resident Inspector was in the control room and overheard the conversation from a radio on the Unit 1 Control Operator's desk. Later, after learning that a Resident Inspector had been touring the Unit 1 Reactor Building at the time the radio communication occurred, the Senior Resident inspector determined the communication represented a warning of the presence of an NRC inspector which is a violation of 10 CFR 50.70 (b)(4).

Investigation into the cause of this event determined that the lead person had not received indoctrination on the requirements of 10 CFR 50.70(b)(4). The current General Employee Training and Retraining programs do not address the requirements of 10 CFR 50.70(b)(4). Being focused on accomplishing the task and not having adequate knowledge of the requirements, the lead person did not think about the implications of his actions with regard to federal regulations. The lead person did not intend to violate the regulations but acted to ensure that good housekeeping and work practices were adhered to during the performance of the work activity.

Corrective Actions Which Have Been Taken and Results Achieved

The involved individual was counseled on management's expectations regarding the requirements of 10 CFR 50.70(b) (4).

Site management has reviewed the event and management's expectations regarding compliance with the requirements of 10 CFR 50.70(b)(4) with site personnel.

Corrective Steps Which Will Be Taken to Avoid Further Violations

The Plant Access Training portion of the General Employee Training and Retraining lesson plans will be revised to include the requirements of 10 CFR 50.70(b)(4). This revision will be completed by December 15, 1995.

Date When Full Compliance Will Be Achieved

Carolina Power & Light believes that it is now in full compliance.

## ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 and 2  
NRC DOCKET NOS. 50-325 & 50-324  
OPERATING LICENSE NOS. DPR-71 & DPR-62  
REPLY TO NOTICE OF DEVIATION

During an NRC inspection conducted on June 19-23, and July 1- August 4, 1995, a deviation of your Updated Final Safety Analysis Report (UFSAR) was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (60FR 34381), the deviation is listed below:

Updated Final Safety Analysis Report, Section 3.4.1.1.1, Protection of Access Openings Below Maximum High Water Elevation, states in part, that "Doors and door frames were designed to ...limit the inleakage from the Probable Maximum Hurricane (PMH) condition to 5 gallons per minute for personnel doors..." Section 3.4.1.1.1.d, Service Water Intake Structure, addresses two personnel doors at elevation 23.0 foot mean sea level.

Contrary to the above, on June 23, 1995, it was identified that the two Service Water Intake Structure flood doors did not meet this design requirement for some unknown time period. The North door was missing the bottom portion of the door frame sill preventing the bottom portion of the door from sealing. The South door had a one inch gap rusted completely through the metal door.

### RESPONSE TO DEVIATION

#### Reason for Deviation:

Due to a lack of appreciation for the Service Water Building door design requirements related to inleakage from external flooding as specified in the Updated Final Safety Analysis Report, the planning and scheduling of the door repair activity did not ensure that the doors were repaired in a timely manner.

#### Corrective Actions Which Have Been Taken and Results Achieved:

The south Service Water Building door was replaced on August 1, 1995.

On August 4, 1995, the system engineer performed an inspection of the power block and auxiliary building flood protection doors. Although minor deficiencies were identified, the deficiencies did not affect the safety function of the doors. Corrective maintenance work request job orders were initiated to support the resolution of the identified problems.

On August 7, 1995, an engineering evaluation was performed to evaluate discrepancies identified during recent inspections of flood protection doors installed on the Emergency Diesel Generator, Augmented Offgas, and Service Water buildings. The evaluation determined that safety system functions are not compromised by conditions identified during the inspections. In addition, the evaluation determined that, although the Service Water Building doors would not meet the inleakage design criteria in their degraded condition, adequate protection of safety related equipment from external flooding is provided. The doors are located above the

Probable Maximum Hurricane maximum stillwater elevation and are shielded from wave action by the external security doors. Additionally, the Service Water Building contains a 250,000 gallon spill reservoir which can accommodate the expected maximum leakage from external flooding through both of the doors in their pre-replacement condition without adversely affecting the functions of the safety-related equipment.

Periodic test procedure, OPT-34.2.2.1, Swinging Fire Door, ASSD Access/Egress Door, Severe Weather Door Inspections: Control Building, Service Water, Diesel Generator, AOG, Reactors 1 and 2, And Radwaste Buildings, has been revised to include inspection criteria for severe weather doors.

Corrective Steps Which Will Be Taken to Avoid Further Deviations:

The north Service Water Building door is scheduled to be replaced by November 3, 1995.

The Equipment Data Base System (EDBS) information screen will be modified to identify site flood doors and annotate the significance of the doors with respect to flood protection capability. This information will be used in the planning of corrective maintenance work requests and will elevate the sensitivity to timely repair of degraded flood doors. This revision to EDDBS will be completed by November 3, 1995.

Enclosure  
List of Regulatory Commitments

The following table identifies those actions committed to by Carolina Power & Light Company in this document. Any other actions discussed in the submittal represent intended or planned actions by Carolina Power & Light Company. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Brunswick Nuclear Plant of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage
1. The Plant Access Training portion of the General Employee Training and Retraining lesson plans will be revised to include the requirements of 10 CFR 50.70(b)(4).	12/15/95
2. The north Service Water Building door will be replaced.	11/3/95
3. The Equipment Data Base System (EDBS) information screen will be modified to identify site flood doors and annotate the significance of the doors with respect to flood protection capability.	11/3/95