

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Unit 1 & 2

Docket No.: 50-325, 50-324
License No.: DPR-71, DPR-62

During a NRC inspection conducted on February 18 - March 30, 1996, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification (TS) 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide (RG) 1.33, November 1972.

RG 1.33 recommends general operating procedures for plant shutdown. Plant Procedure OGP-05, Unit Shutdown, procedure step 5.3.23 requires the cooldown rate to be maintained less than 100 degrees Fahrenheit (F) per hour. Procedure step 5.3.25.c requires recording of the bottom head temperature every half hour during cooldown. Procedure general precautions and limitations 3.20 requires for cooldown reactor vessel pressure and both saturation temperature and vessel bottom head temperature must be monitored for compliance with TS 3.4.6.1

Contrary to the above, the licensee failed to follow the procedure for the following two examples:

- (1) On February 3, 1996, the licensee failed to limit the cooldown rate to less than 100 degrees F in any one-hour period during the Unit 2 shutdown. The cooldown rate was exceeded in 36 minutes and was 114 degrees F in an one-hour period.
- (2) On March 18, 1996, the licensee failed to record bottom head temperature during the Unit 1 cooldown. The NRC inspector noted during the cooldown at 10:15 a.m. on March 18, 1996, that the vessel bottom head temperature was not being recorded. The cooldown began at 4:25 a.m. on March 18, 1996.

This is a Severity Level IV Violation (Supplement 1). This is applicable to both Units.

- B. 10 CFR 50 Appendix B Criteria V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, the licensee failed to have an appropriate instruction for deleting the Main Steam Line High Radiation trip function for Unit 2 under Plant Modification 92-147 on February 17, 1996. The work instructions did not adequately separate Reactor Protection System (RPS) division trip logic resulting in an unexpected full RPS trip signal. A similar violation, 325/95-10-03, occurred

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during installation of this same modification for Unit 1 on April 10, 1995, resulting in a loss of shutdown cooling.

This is a Severity Level IV Violation (Supplement I). This is applicable to Unit 2 only.

- C. 10 CFR 19.12 requires, in part, that all individuals working in a restricted area be instructed in the precautions and procedures to minimize exposure to radioactive materials, in the purpose and functions of protective devices employed, and in the applicable provisions of the Commission's regulations and licenses.

Carolina Power and Light Training Instruction OTI-300, General Employee Training, Revision 21, Paragraph 5.4.2, dated January 2, 1996, requires contamination area training for individual who will be allowed unescorted access to contaminated areas of the plant.

Contrary to the above, individuals who were working in restricted areas had not been instructed in the applicable provisions of the regulations and the conditions of the license. Specifically, during 1996 through February 29, multiple examples of individuals allowed unescorted access to contaminated areas of the plant without required contamination area training were identified.

This is a Severity Level IV violation (Supplement IV). This is applicable to both Units.

- D. TS 6.8.1.f requires that written procedures shall be established, implemented, and maintained covering the activities in the Fire Protection Program.

Fire Protection Procedure OFPP-14, Control of Combustibles, Transient Fire Loads, and Ignition Sources, establishes administrative controls for the transport, utilization and storage of transient combustibles in buildings necessary for power production, containing installed safety-related equipment or cables, and containing a radioactive process or storage of radioactive material fire areas.

Contrary to the above, the licensee failed to follow the procedural requirements for the following two examples:

- (1) On March 13, 1996, the requirements of OFPP-14 were not implemented when painters brought class IB combustible liquids into two identified fire areas in the turbine and control buildings without properly listing the material on the required transient load evaluations 96-02-101 and 96-03-05.
- (2) On March 13-14, 1996, combustible material was found on the 80 ft. west elevations of both units without a valid transient loading evaluation present, nor was the material properly tracked in the required OFPP-14 Attachment 3 transient load evaluation log book.

This is a Severity Level IV, Supplement I. This is applicable to both Units.

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 at the facility that is the subject of this Notice, 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 29th day of April 1996