

## NOTICE OF VIOLATION

Carolina Power and Light Company  
Brunswick Unit 1 & 2

Docket No. 50-325 and 50-324  
License No. DPR-71 and DPR-62

During an NRC inspection conducted from October 27 through December 7, 1996, two 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 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable activities recommended in Appendix A of Regulatory Guide 1.33, November 1972.

Regulatory Guide 1.33 recommends that maintenance activities which can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Brunswick Site Procedure BSP-35, Outage Planning requires that schedule changes be made after obtaining final approval of the Superintendent - Outage Management.

Brunswick Engineering Procedure, OPLP-30, Engineering Service Requests, requires that a system impact evaluation be performed to identify any impact that the modification would have on plant operations.

Modification Administrative Procedure OMAP-005, Implementation of Major Modifications, requires that prerequisites are verified prior to start of work and that work shall be performed in accordance with the instructions drawings, sketches, design documents, and procedures as specified in the Work Request/Job Order (WR/JO). Precautions contained in the WR/JO required the performance of a pre-job briefing with operations to discuss precautions to be taken during implementation of the modification.

Contrary to the above, these procedural requirements were not met for the following three examples for structural modifications on instrument rack 1-H21-P022 containing reactor pressure switch 1-B32-PS-N018B. Jarring of the pressure switch caused a Group 8 containment isolation which resulted in a loss of shutdown cooling for Unit 1 on October 11, 1996.

1. In September 1996, an outage scheduler moved the structural modification to the instrument rack before completion of core offload. This change allowed work activities to be conducted when associated instrumentation was required to be operable resulting in a loss of shutdown cooling. This schedule change did not receive the required BSP-35 final approval.

ENCLOSURE 1

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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 2nd day of January 1997

2. In July 1995, the system impact evaluation performed for Engineering Service Request 94-406 was not appropriate to the circumstances because it failed to address the affect the structural modification would have on shutdown cooling.
3. On October 11, 1996, craft personnel failed to perform a pre-job briefing with operations prior to start of work associated with WR/JO 95-AENB5.

This is a Severity Level IV Violation (Supplement I). This is applicable to Unit 1 only.

- B. Technical Specification 6.8.1 requires that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A, Paragraph G, "Procedures for Control of Radioactivity" of Regulatory Guide 1.33, dated November 1972.

10 CFR 20.1502 (a)(2) requires the licensee to monitor occupational exposure to radiation by declared pregnant women likely to receive a dose in excess of ten percent of the applicable limit of 500 millirem in one year from sources external to the body.

Contrary to the above, Carolina Power and Light Standard Procedure DOS-NGGC-0002. "Dosimetry Issuance", Revision 1, dated August 12, 1996, within Paragraph 9.9.5, fails to require monitoring of occupational exposure to radiation by declared pregnant women likely to receive a dose in excess of ten percent of the applicable limit of 500 millirem.

This is a Severity Level IV Violation (Supplement IV). 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, D.C. 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 "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 a 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,