

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Plant

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on February 8-12, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. Technical Specification 6.12.2 requires that each high radiation area, in which the intensity of radiation is greater than 1,000 millirem per hour, be provided with locked doors to prevent unauthorized entry into such areas.

Contrary to the above, on November 12, 1987, an auxiliary operator (AO) while performing daily rounds of plant systems unlocked the entrance to the Unit 2, 80 foot east fuel pool heat exchanger room, a high radiation area with radiation levels in excess of 1,000 millirem per hour, and left the area unattended.

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

- B. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, November 1972.

Regulatory Guide 1.33, Appendix A, Section I.3, recommends that procedures for the repair or replacement of equipment be prepared; Section G.5 recommends that procedures for personnel radiation monitoring and special work permits be prepared; and Section I.5.b recommends that factors be taken into account, including the necessity for minimizing radiation exposure to workmen, in preparing detailed procedures.

Technical Specification 6.11.1 requires that procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving radiation exposure.

Plant Procedure ENP-46, SRM/IRM Dry Tube Replacement, covers the removal, transfer, and storage of startup source range monitor dry tubes.

Radiation Control and Protection Procedure, Volume VIII, Section 6.6.2 requires that personnel dosimeters shall be worn at all times and that

self reading pocket dosimeters should be observed at periodic intervals when working in radiation or high radiation areas.

Radiation Control and Protection Procedure, Volume VIII, Section 6.6.3 specifies that required items of protective clothing shall be worn by all personnel while in radiation controlled areas.

Contrary to the above, the licensee failed to establish adequate radiation protection procedures concerning handling of irradiated dry tubes and using personnel monitoring devices, and to adhere to a radiation control procedure in that:

1. On November 12, 1987, an auxiliary operator, while making daily rounds of plant systems, failed on two occasions to wear the required protective clothing while in radiation controlled areas.
2. On January 23, 1988, a licensee individual was preparing a feedwater nozzle for inservice inspection. The worker failed to monitor his self-reading pocket dosimeter (SRPD) during the time spent in the high radiation area and received an exposure of 800 millirem. Plant procedure VIII Section 6.6.2 was inadequate in that the procedure did not require the worker to frequently read his SRPD while working in a high radiation area.
3. On January 31, 1988, while transferring a startup source range monitor dry tube to a storage location in the spent fuel pool, a section of the dry tube broke the surface of the water (shielding) and exposed workers for a very short time period to high levels of radiation. Plant procedure ENP-46 used during the operation did not contain adequate instructions and precautionary steps to ensure that the dry tube remained under water and radiation exposure to personnel were minimized.

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

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light is hereby required to submit a written statement or explanation to the 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, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the

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time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION

Douglas M. Collins

Douglas M. Collins, Chief
Emergency Preparedness and
Radiological Protection Branch
Division of Radiation Safety
and Safeguards

Dated at Atlanta, Georgia
this *16th* day of March 1988