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Carolina Power & Light Company

Brunswick Steam Electric Plant **OCT 20 P 6: 10**
P. O. Box 10429
Southport, NC 28461-0429
October 16, 1986

FILE: B09-13510C
SERIAL: BSEP/86-1431

Dr. J. Nelson Grace, Administrator
U.S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street NW
Atlanta, GA 30323

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Dear Dr. Grace:

The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/86-17 and 50-324/86-18 and finds that it does not contain information of a proprietary nature.

This report identified two items that appeared to be in noncompliance with NRC requirements. Enclosed is Carolina Power & Light Company's response to these violations.

Very truly yours,

C. R. Dietz, General Manager
Brunswick Steam Electric Plant

RMP/mcg

Enclosure

cc: NRC Document Control Desk

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VIOLATION A

10CFR50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, as implemented by the licensee's accepted Quality Assurance Program (FSAR Chapter 17.2.5), requires that activities affecting quality shall be accomplished in accordance with instructions and procedures. Brunswick Construction Unit Procedure, WP-18, Rev. 0, Temporary Construction Loads, states that, "rigging from pipe hanger struts, spring cans, snubbers or snubber parts shall not be allowed."

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that, on July 11, 1986, scaffolding was found rigged to the Reactor Core Isolation Cooling (RCIC) System discharge header snubber attachment rod for support E51-41SS89, contrary to WP-18.

This is a Severity Level V violation (Supplemental I) applicable to Unit 1.

RESPONSE

I. Admission or Denial of the Alleged Violation

Carolina Power & Light Company acknowledges that scaffolding was found rigged to RCIC snubber E51-41SS89.

II. Reason for the Violation if Admitted

Personnel did not follow approved procedures in rigging the scaffolding.

III. Corrective Steps Which Have Been Taken

When it was identified that the scaffolding was attached to a "snubber part," the scaffolding was immediately reconfigured and subsequently removed. Following a review of the event, the controlling procedure (WP-18) was revised to provide clarification by incorporating statements concerning snubbers that were previously included in the procedure appendix. The individual responsible for rigging the scaffolding to the snubber was appropriately disciplined. On July 14, 1986, Brunswick Construction Unit (BCU) craft personnel involved in scaffold erection were reinstructed on the requirements of WP-18.

IV. Corrective Steps Which Will Be Taken

No other actions are planned due to this event.

V. Date When Full Compliance Will Be Achieved

Full compliance has been achieved for this item.

VIOLATION B

Technical Specification 6.8.1.f, requires that written procedures shall be implemented covering the Fire Protection Program implementation. Fire Protection Procedure FPP-014, Revision 2, Control Combustibles, Transient Fire Load and Ignition Sources, Attachment 3, lists the Diesel Generator Building as a designated no smoking area.

Contrary to the above, Procedure FPP-014 was not implemented in that on July 28, 1986, eight smoked cigarette butts were found in ventilation ducts between the diesel generator fan room and emergency switchgear rooms, indicating that smoking had occurred in the Diesel Generator Building.

This is a Severity Level IV violation (Supplement 1) applicable to Units 1 and 2.

RESPONSE

I. Admission or Denial of the Alleged Violation

Carolina Power & Light Company admits that smoked cigarette butts were found in the ventilation ducts between the diesel generator fan room and emergency switchgear rooms, indicating that at some point in time following installation of the duct work, smoking had occurred in the area. It should be noted that the appearance of the cigarette butts found indicated that they had not been smoked recently.

II. Reason for Violation

It is believed that at some past indeterminate time, personnel having access to the Diesel Generator Building were either not aware of the no-smoking restriction or did not understand the significance of smoking in a no-smoking area. Also, it is possible that the cigarette butts, being in a location not readily accessible for cleanup or inspection, may have been in the ductwork since prior to imposition of no-smoking restrictions; i.e., during initial construction.

III. Corrective Steps Which Have Been Taken and Results Achieved

Awareness of the problem has been conveyed via memorandum to Plant Management Group, Construction, and Training. A meeting was conducted with the plant Fire Watch and Fire Watch Foreman outlining the reason no-smoking areas exist and what to do if a violator is observed smoking in a no-smoking area. Housekeeping tours continue to be conducted on a weekly basis.

IV. Corrective Steps Which Will Be Taken

Housekeeping tours (FPP-013) are weekly and will continue to inspect no-smoking areas on a regular basis to ensure continued compliance.

V. Date When Full Compliance Will Be Achieved

Full compliance has been achieved on this item.