



Carolina Power & Light Company

Brunswick Nuclear Project
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U.S. Nuclear Regulatory Commission
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BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 AND 2
DOCKET NO. 50-325 AND 50-324
LICENSE NO. DPR-71 AND DPR-62
RESPONSE TO INFRACTIONS OF NRC REQUIREMENTS

Gentlemen:

The Brunswick Steam Electric Plant (BSEP) has received I&E Inspection Report 50-325/88-41 and 50-324/88-41 and finds that it does not contain information of a proprietary nature.

This report identified item that appeared to be in noncompliance with NRC requirements. Enclosed is Carolina Power & Light Company's response to this violation.

Very truly yours,

J. L. Harness, General Manager
Brunswick Nuclear Project

TMJ/ah

Enclosure

cc: Mr. M. L. Ernst
Mr. E. G. Tourigny
BSEP NRC Resident Office

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VIOLATION

Technical Specification 6.2.2.g requires that administrative procedures be developed and implemented to limit the working hours of the facility staff, including auxiliary operators, who perform safety-related functions, and that such procedures meet the guidelines published by the Commission in Generic Letter (GL) 88-12.

GL 88-12, June 15, 1982, states that an individual should not be permitted to work more than 72 hours in any seven day period (excluding shift turnover time), but if very unusual circumstances may arise, the plant General Manager or higher levels of management may authorize the individual to exceed this time limit if a significant reduction in the effectiveness of the individual would be highly unlikely.

The plant Administrative Procedure Volume 1, Rev. 116, November 10, 1988, Section 4.4.C, states that an individual shall not work more than 72 hours in any seven-day period (not including shift turnover time) and that scheduling in excess of these limits may be authorized by the plant General Manager in exceptional circumstances.

Contrary to the above, during the time period of November 15-26, 1988, four auxiliary operators worked in excess of 72 hours during a seven-day period without prior plant General Manager authorization.

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

RESPONSE

I. Admission or Denial of the Alleged Violation

CP&L admits that, contrary to Technical Specification 6.2.2.g and Administrative Procedure (AP), Volume 1, Rev. 116, Section 4.4.C, auxiliary operators worked in excess of 72 hours during a seven-day period without prior plant General Manager authorization.

II. Reason for the Violation

During the period of November 15-26, 1988, four auxiliary operators worked 81, 77, 80.5, and 77 hours during the seven-day period. Although this fact was identified during a time sheet review by the individuals' supervisor and subsequently reported on Attachment 4-1 to Volume 1, Section 4.4, neither the individuals nor their supervision were aware that the administrative limits on overtime were being exceeded at the time the work was being performed. This is an apparent lack of adequate communication by responsible plant management to individuals clearly defining both the worker's and his supervision's responsibilities in assuring that the guidelines in the BSEP technical specifications and Plant Operating Manual are adhered to in regards to obtaining prior

approval for overtime work in excess of the restrictions in these documents. In addition, guidance provided within the AP for control of overtime was inadequate in that the procedure did not clarify that prior approval for personnel exceeding the overtime guidelines in the AP by the plant General Manager was required before the guidelines were exceeded, and that the AP contained an exception to Generic Letter 82-12 which had been approved under NUREG 0737, item I.A.1.3. This exception was not authorized in GL 82-12.

III. Corrective Steps Taken and Results Achieved

This violation was identified to the Quality Assurance (QA) group as a self-identified nonconformance by the Operations group. The Operations Manager issued a memorandum to all Operations personnel clearly defining their responsibilities related to the overtime restrictions in Volume 1, Book 1, of the Plant Operating Manual. In addition, Standard Operating Procedure (SOP)-02.6, Overtime Records, has been revised to include specific directions for following the plant overtime policy guidelines when scheduling overtime within the Operations group.

IV. Corrective Steps Which Will Be Taken to Avoid Further Violations

A review has determined that overtime scheduling and hours worked is not an issue relating strictly to the Operations group at BSEP. This review concluded that confusion existed as to which personnel were included under the guidelines of GL 82-12, mainly in regards to the "key maintenance personnel" definition. The BSEP Project Manager has issued a site memorandum placing direct accountability for adherence to the overtime policies at BSEP on individual unit managers and directors, tasking each to ensure compliance. This memorandum also identified those work functions which fall under the requirement of GL 82-12.

Additionally, the plant Administrative Procedure, Volume 1, Book 1, is being revised to delete the reference to the overtime limitations only applying when the Reactor Coolant System is greater than 200°F or when fuel is being moved within the reactor pressure vessel, to incorporate specific reference to prior approval from the plant General Manager before the guidelines are exceeded, and to revise the guideline wording to be consistent with the wording in GL 82-12 with respect to the number of hours individuals will be allowed to work without prior Plant Manager approval.

Until it is assured that groups whose personnel are affected by the overtime guidelines are adhering to technical specifications and the policy described in Volume 1, Book 1, Section 4.4, of the Plant Operating Manual, the BSEP Project Quality Assurance group will perform periodic surveillance on this issue.

V. Date When Full Compliance Will Be Achieved

BSEP will be in full compliance with these guidelines, including the appropriate procedure revisions and surveillance program initiation, by April 1, 1989.