



Carolina Power & Light Company

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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

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

Gentlemen:

The Brunswick Steam Electric Plant (BSEP) committed in response to Violation B, NRC Inspection Report 50-325/89-26 and 50-324/89-26, to supplement that response, outlining final corrective actions necessary to ensure compliance. This report fulfills that commitment.

Very truly yours,

J. L. Harness, General Manager
Brunswick Nuclear Project

TH/mcg

Enclosure

cc: Mr. S. D. Ebnetter
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Supplement to IER 89-26, Violation B

This supplement fulfills a commitment made to finalize the response to Violation B of Inspection Report 89-26, following completion of the investigation of NCR S-89-124. The purpose of this supplement is to indicate final resolution of corrective actions deemed necessary for the items identified in NCR S-89-124 and IER 89-26, for these related Control Room Reactor Turbine Generator Board (RTGB) tag events.

As a result of the Human Performance Evaluation performed for the initial event, misplacement of a control tag for the Unit 2 SW-F075 valve, and subsequent event investigation involving swapping of control tags for the Unit 2 B21-F022B and F022D Main Steam Isolation Valves (MSIVs), the following corrective actions were initiated:

1. NCR S-89-089 was initiated on the F075 event.
2. A Human Performance Evaluation was completed on the F075 event.
3. A Standing Instruction was issued directing weekly Control Board audits by the Operations group for clearance placement accuracy, pending completion of necessary procedure revisions to direct continuance of these audits. Operations Instructions for Daily Surveillance Reports were subsequently revised to include these audits on a weekly basis.
4. An Operations memorandum was issued outlining the proper method to be used for correcting errors on clearance tags as an interim measure, until procedure revisions can be made.
5. Involved Operations personnel were counseled on the events.
6. An Operations memorandum was issued to Shift Foremen/Senior Control Operators to emphasize detailed tag verification prior to their accepting clearances.
7. An NCR (S-89-124) was issued for items found on a Control Board review subsequent to the F022B/D event.

As indicated by the initial response to IER 89-26, Violation B, further corrective actions deemed necessary included:

1. Revision of the clearance procedure, AI-58 to give guidance on removal of tags for correction of errors.
2. Discrepancies were noted between the controlling

procedure and clearance tags used at BSEP in terms of information required on the clearance tags. These tag discrepancies are being corrected.

3. A review of recommendations from the investigation of NCR S-89-124, further evaluating the Control Board clearance tag issue.

As a result of the review of recommendations from investigations of the involved events, additional corrective actions are being pursued. These are:

1. Red caps used to designate equipment/components out of service on the control board are to be evaluated to determine the need for the use of stickers on the caps which have spaces for the procedurally required information only.
2. Reemphasize to operators and their supervision the importance of evaluating partial periodic tests to ensure that potential consequences of omitted steps are recognized.
3. As identified in Recommendation #12 of the Clearance Task Force Report, BSEP will evaluate the feasibility of eliminating the use of clearances to establish lineup control for LLRTs when equipment or personnel protection is not required.

It is felt that these actions, in conjunction with previously committed actions from the initial response will effectively resolve the control board tag issues involved with the events relative to IER 89-26.