

CP&L

Carolina Power & Light Company

Brunswick Nuclear Project

P. O. Box 10429

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August 16, 1990

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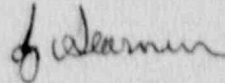
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

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 A NOTICE OF VIOLATION

Gentlemen:

The NRC issued to Carolina Power and Light Company a NOTICE OF VIOLATION concerning locked high radiation area boundary violations at the Brunswick Steam Electric Plant (BSEP) in NRC Inspection Report 50-325/90-06 and 50-324/90-06. In the Company's June 29, 1990 response, CP&L committed to provide a supplemental response by August 17, 1990. The attached response fulfills that commitment.

Very truly yours,



J. L. Harness, General Manager
Brunswick Nuclear Project

TH/th

Enclosure

cc: Mr. S. D. Ebnetter
Mr. N. B. Le
BSEP NRC Resident Office

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ATTACHMENT 1
SUPPLEMENT TO NOTICE OF VIOLATION

Carolina Power and Light Company is extremely dissatisfied with the frequency of locked high radiation area doors found unsecured during the last year at the Brunswick Plant. In order to make significant improvement, strong programmatic actions were taken to preclude recurrence of these incidents.

Environmental and Radiation Control (E&RC) and Operations personnel received special counseling on their responsibilities to confirm the proper closure of the locked high radiation area doors they pass through. These personnel, which are the primary users of locked high radiation area doors, received this counseling through Real Time Training and management directive (both verbal and written).

E&RC Procedure 0040, "Locked High Radiation Area Key Control," was revised to provide centralized issuance of locked high radiation area door keys by the E&RC group. Previously, these keys were issued primarily by E&RC, with the Operations group issuing keys to Operations personnel. In addition, a verification form was developed to accompany each locked high radiation area key whenever a worker checks a key out. This form provides improved accountability by requiring a worker to document each locked high radiation area door he/she accesses, and also document his/her verification that the door was properly locked after each entry/exit. This form is being implemented on an interim basis, and its continued use will be evaluated following completion of any additional corrective actions that may result from the Human Performance Assessment discussed below.

A Preventive Maintenance program was established for the Reactor Building and Turbine Building gates that are self-locking, with the intent of ensuring proper operation of these doors. These doors have been involved in the majority of the door incidents.

For a six month period following the implementation of these latest programmatic improvements, there were no incidents of high radiation area doors being unlocked. On August 3, 1990, a high radiation door was found to be open during a routine check by Health Physics. The open door was found a short period of time after the door was left open, demonstrating the effectiveness of the mitigating actions instituted by the plant. The verification form initiated by E&RC enabled the plant to very quickly determine the individuals involved, and to subsequently determine that personnel error, inadequate verification, was the reason for the door being left open. Appropriate disciplinary actions have been taken with the involved personnel.

Independent of the above items, a Human Performance Evaluation (HPE) assessment was performed on the high radiation door events relative to this violation. Based on this assessment, design deficiencies relative to the latched gates have been identified. CP&L's Nuclear Engineering Department (NED) has been requested to determine the most feasible methods for eliminating the design deficiencies involved with the latched gates. Engineering of the necessary changes to the latched gates is ongoing. Following completion of the engineering packages, any proposed changes will be evaluated and scheduled in accordance with the site Nuclear Prioritization Process.

The work on these gates is considered to be an enhancement to the programmatic changes that have been made. CP&L feels that full compliance has been achieved on this issue, irrespective of upcoming changes to the latched gates. The real issue with door control lies not with poor door design or closure devices, but rather with the failure of individuals using plant doors to verify that they are

**ATTACHMENT 1
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closed and latched. Reliance on automatic closure devices alone to control a door required to be shut and latched is not an acceptable practice.

To ensure this philosophy is stressed to site personnel, a memorandum was issued on August 12, 1990, delineating this philosophy. To further stress this point, the Brunswick Training Unit will include this information in General Employee Training/General Employee Retraining (GET/GER) programs. In addition, Plant Management and Security personnel have been requested to monitor personnel use of doors during normal plant tours.

Personnel accountability for the quality performance of tasks by individuals and their supervision has been reinforced to site personnel by plant management. Individuals are being held personally accountable for their actions relative to the closure of these doors, as demonstrated by the August 3, 1990 event.

Based on the effectiveness of the programs established since the issuance of this violation in both the prevention of these deficiencies and the effectiveness and timeliness of discovery of the deficiencies, CP&L considers the BSEP program for the control of high radiation area doors to be in compliance with the requirements of the Technical Specifications. Any additional work on the latched gates is considered to be an enhancement to the existing program, and is not required to ensure compliance with Technical Specifications. BSEP management feels that only by the attention of each individual can proper door control be assured.