

NOTICE OF VIOLATION

Carolina Power & Light Company
H. B. Robinson Unit 2

Docket No.: 50-261
License Nos.: DPR-23

During an NRC inspection conducted during the period November 3-7, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 50.65(b) establishes the scoping criteria for selection of safety-related and non-safety related structures, systems, or components to be included within the Maintenance Rule program. The scope shall include safety-related structures, systems, or components that are relied upon to remain functional during and following design basis events to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, and the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the 10 CFR, Part 100 guidelines; and non-safety related structures, systems, or components that are relied upon to mitigate accidents or transients, or are used in the plant emergency operating procedures, or whose failure could prevent safety-related structures, systems, and components from fulfilling their safety-related function, or whose failure could cause a reactor scram or actuation of a safety-related system.

Contrary to 10 CFR 50.65(b), as of November 3, 1997, the licensee failed to include one structure (switchyard relay building) and one system (turbine exhaust hood spray) within the scope of the Maintenance Rule.

1. The switchyard relay building, a structure which contained non-safety related switchyard and transformer system protective relays whose failure could cause a reactor trip. A failure of this structure could cause a failure of these protective relays.
2. The turbine exhaust hood spray system, a non-safety related system whose failure could cause a reactor trip.

This is a Severity Level IV violation (Supplement I)

- B. 10 CFR 50.65(a)(1) requires, in part, the holders of an operating license shall monitor the performance or condition of structures, systems, and components (SSCs), as defined by 10 CFR 50.65(b), against licensee-established goals, in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions. When the performance or condition of SSCs does not meet established goals, appropriate corrective action shall be taken.

Contrary to 10 CFR 50.65(a)(1), as of November 3, 1997, the licensee failed to monitor the performance or condition of the Instrument Air System against licensee-established goals effectively, in that the licensee did not adequately implement its monitoring program by failing to identify 13 hours and 49 minutes of unavailability for the "A" and

"B" Air Compressors, which occurred on June 3, 1997, and 36 minutes of unavailability for the Primary Air Compressor, which occurred on June 27, 1997. Monitoring unavailability is necessary in order to provide reasonable assurance that the Instrument Air System (a high safety significant system) remained capable of performing its intended function.

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

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light Company is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the Robinson facility, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violations, or, if contested, the basis for disputing the violations; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 5th day of December 1997