

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Company
Robinson

License No. DPR-23

Based on the NRC inspection August 18-22, 1980, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below. These items have been categorized as described in correspondence to you dated December 31, 1974.

- A. As required by Technical Specification 6.5.1.7a, the PNSC must review changes to the facility as described in the safety analysis report to determine if the change constitutes an unreviewed safety question or change in technical specifications. FSAR Figure 11.1-2, Waste Disposal System, describes normal operation of the backup nitrogen regulator to the Chemical and Volume Control system vent header (PCV-1049) as automatic with regulator inlet isolation valve 1661 normally open. (Section A-5 of PLS-8, the Precautions, Limitations, and Setpoints for the Waste Disposal System stated that for proper operation of the waste gas system, PCV-1049 must operate to be open at 0.5 psig and shut at 0.8 psig.)

Contrary to the above, for approximately two years up to and including August 20, 1980, inlet isolation valve 1661 was normally closed precluding automatic operation of PCV-1049. A review to determine if the change constituted an unreviewed safety question was not performed.

This is an infraction.

- B. As required by Technical Specification 6.8.1 written procedures must be established and implemented to satisfy the requirements of Section 5.3 of ANSI N18.7-72. Section 5.3 of ANSI N18.7-72 required maintenance procedures adequate for the correct performance of work.

Contrary to the above, as of August 18, 1980, maintenance instructions had either not been established or had not been implemented resulting in the following nonconforming conditions near the Main Steam Isolation Valves:

1. The electrical junction box containing safety related control circuits of MS-V1-3B had holes in the box and its inspection plate was loose.
2. Freeze protection wiring for the steam break protection system pressure transmitters were missing three conduit body covers. This wiring for the PT-486 condensing pot was missing insulation and appeared to be grounded to the conduit.

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3. Five bolts in the seismic support structure for the "A" main steam line were loose.
4. The cable conduit for auxiliary feed pump steam supply valve MS-V1-8B was not fastened either to its support or its junction box.

This is an infraction.

- C. As required by 10CFR55, Appendix A, the on-the-job training portion of the continuous operator requalification program must assure that each licensed and senior operator is cognizant of changes to facility design and procedures.

Contrary to the above, as of August 21, 1980, the requalification program did not assure cognizance of the facility changes in that for six changes effective an average of seven months, the completion of required reading had not been satisfied by an average of six licensed and senior operators.

This is a deficiency.