

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Company  
Robinson

License No. DPR-23

Based on the NRC inspection September 29 - October 2, 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 Specifications Section 6.8, written procedures and administrative policies shall be established, implemented and maintained for the Fire Protection Program. The Fire Protection Program implementation procedures for the control of the hazards associated with welding and cutting operations are contained in CP&L's Plant Operating Manual Volume 19 - Fire Protection Manual, Hotwork Procedure FP-1. This procedure requires: a permit signed by a person designated by the plant manager who is to inspect the area prior to initiation of the hot work operation; floors within 35 feet of the work area to be swept clean of combustibles or covered; a fire watch to be provided for all hot work; and, the fire watch to be equipped with a portable fire extinguisher.

Contrary to the above, on September 29 and October 2, 1980 a number of welding operations were being conducted within the containment area adjacent to safety related equipment which were not in conformance with the fire prevention welding and cutting procedure. Some typical examples are as follows:

1. Welding and cutting operations were being conducted without an approved "Hot Work Permit."
2. Welding and cutting operations were being conducted directly over combustible materials, i.e. floors had not been swept clean.
3. Fire watches were not assigned to observe "hot work" operations.
4. Fire extinguishers were not provided in the vicinity of welding and cutting operations.

This is an infraction.

- B. As required by Technical Specifications Section 6.8, written procedures and administrative policies shall be established, implemented and maintained for the Fire Protection Program. The implementation procedure for the storage of equipment and components to prevent damage or degradation are contained in Construction Procedure AP-IX-04, Material Storage, and for storage of piping in process are included in Construction Procedure WP-107, Cleanliness Maintenance of Piping Systems.

Contrary to the above, the following procedure violations were noted:

1. Fire pump diesel engine was stored outside. Section 4.3 of Procedure AP-IX-04 requires items such as diesel engines to be stored in a standard (Class 2) weathertight warehouse or equivalent enclosure.
2. Fire pump engine controller was stored in a combustible work shed and engine batteries were stored outside. Section 4.2 of Procedure AP-IX-04 requires items such as batteries and engine control panels to be stored in a standard (Class 1) fire resistant, temperature controlled warehouse or equivalent enclosure.
3. Fire pump engine, batteries, and controller were not identified for traceability and status. Section 4.6 of Procedure AP-IX-04 requires all fire protection "Q" list materials to be tagged for identification, traceability and status.
4. Fire protection piping being installed in the containment was not sealed or capped when ends were not being worked on. Section 3.7 of Procedure WP-107 requires component ends to be appropriately plugged or sealed against entry of contaminate during times when the ends are not being work upon.

This is an infraction.