

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on August 18-22, 1986, a violation of NRC requirements was identified. The violation involved inadequate procedures for respirator fit testing and contamination control surveys for release of material to uncontrolled areas. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

Technical Specification 6.5.1.1.1.a requires written procedures to be established, implemented, and maintained to cover the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, 1978, requires written procedures for respiratory protection programs and contamination control.

10 CFR 20.103(c) allows the licensee to make allowance for the use of respiratory protection equipment in estimating exposures of individuals to airborne radioactive material provided that the licensee maintains and implements a respiratory protection program that includes, as a minimum, written procedures regarding fitting of respirators.

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in 10 CFR Part 20 and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Contrary to the above, the licensee failed to establish adequate radiation protection procedures concerning respiratory protection and contamination control surveys for release of material to uncontrolled areas in that:

- a. Licensee procedure HPP-102 "Respiratory Fit Testing," Revision 4, May 16, 1986, did not require fit testing for Self Contained Breathing Apparatus (SCBAs) prior to making allowance for the protection afforded by the device in estimating individual exposure to airborne radioactive material.
- b. Licensee procedure HPP-004 "Radiological Control of Tools and Equipment," did not contain adequate guidance to cause surveys to be made, as were reasonable and necessary, to evaluate the potential internal contamination of material being released to uncontrolled areas for unrestricted use.

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

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light Company is hereby required to submit to this Office within 30 days of the date of the letter transmitting this Notice a written statement or explanation in reply including: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by
Luis A. Reyes /for

Roger D. Walker, Director
Division of Reactor Projects

Dated at Atlanta, Georgia
this ____ day of _____ 1986