ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light
H. B. Robinson

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 22-26, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violations are listed below:

A. 10 CFR 50 Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, measures were not adequate to assure conditions adverse to quality were corrected nor the cause of the conditions determined for a problem with motor actuators to valves V2-16A on May 14, and September 2, 1988, and CC-730 on January 10 and April 6, 1989 and with the thermal overload device to the motor actuator for valve V2-6A on October 28, 1988.

With regards to the motor actuators to valves V2-16A and CC-730, repetitive failures were never fully evaluated nor was a thorough root cause analysis performed. The thermal overload device for the motor actuator to valve V2-6A inadvertent trips were not always documented nor, was a proper engineering evaluation performed when a trip was documented. These findings are detailed in Section 2.5 of NRC Inspection Report No. 50-261/89-200.

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

B. 10 CFR 50 Appendix B, Criterion III requires that design changes, including field changes are subject to design control measures commensurate with those applied to the original design. Additionally, Criterion III requires that measures be established for the selection and review of suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components.

Contrary to the above, four examples of inadequate, improperly engineered design changes were identified during the inspection:

Modification 551, accomplished in 1980 and 1981. Three valves were replaced with those of a different type without performing an evaluation as to the acceptability of using the old valve motor actuators.

Modification 939, initiated in August 1988. Improperly sized thermal overload devices were installed in motor operated valve circuits.

Modification 638, accomplished in June 1982. The wrong voltage was specified for the replacement of three valve/acutator combinations.

Work Requests 87-AFBR1 and 87-AFWI, accomplished in 1987. Three actuator motors were replaced without performing thermal overload device sizing calculations.

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 Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, H. B. Robinson, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [for each violation]: (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. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION

Caudle A. Julian

Caudle A. Julian, Chief
Engineering Branch
Division of Reactor Safety

Dated at Atlanta, Georgia
this 22nd day of September 1989