

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson

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

During the NRC inspection conducted on January 11 - February 15, 1991, 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 (1990), the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion III, requires in part, that measures shall provide for verifying or checking the adequacy of design, such as by the performance of a suitable testing program. ANSI N18.7-1976, Administrative Controls and Quality Assurance Requirements for the Operational Phase of Nuclear Power Plants, section 5.27, states that a suitable level of confidence in structures, systems, or components on which maintenance or modifications have been performed shall be attained by appropriate inspection and performance testing.

Contrary to the above, appropriate performance testing was not identified for modification M-1016, Electrical Penetration Replacement, prior to the modification being declared operable on January 22, 1991. The specified testing for 45 Rod Position Indicators (RPI) was performance of loop calibration procedure LP-551, Rod Position Indication System; however, this test was inadequate to functionally verify individual RPI performance. Additionally, a resistance check specified for approximately 60 temperature elements was inadequate to verify proper connection of the elements' respective power cables. These examples are not inclusive of all potentially inappropriate tests identified in the modification.

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

- B. 10 CFR 50, Appendix B, Criterion V requires activities affecting quality be accomplished in accordance with prescribed instructions, procedures, or drawings. Modification M-1016, Electrical Penetration Replacement, prescribed specific procedures to be performed in accomplishing component functional testing for modification acceptance testing. Additionally, control wiring diagram B-190628 sheet 237 required a 10 ampere fuse to be installed in the A safety injection pump control circuit.

Contrary to the above, activities affecting quality were not accomplished in accordance with prescribed procedures or drawings in that:

1. Prior to modification M-1016 being declared operable on January 22, 1991, loop calibration procedures LP-551 which was specified to be performed on 45 RPIs, and LP-251, Radiation Area Monitors RMS (R1-R8),

which was specified to be performed on radiation monitors R-2 and R-7, were not performed as required by the modification's acceptance testing.

2. A 30 ampere fuse was installed in the A safety injection pump control circuit instead of the 10 ampere fuse required by control wiring diagram B-190628.

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

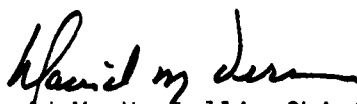
- C. Technical Specification 6.5.1.1.1.C requires written procedures be established for surveillance and test activities of safety-related equipment. Technical Specification 4.1.1 requires calibration of Table 4.1-1 item 18, containment pressure channels. Procedure OST-351, Containment Spray System, revision 10, performed the required functional test of the steam line isolation function associated with the containment pressure channel calibration.

Contrary to the above, procedure OST-351 was not adequately established, in that, the procedure did not fully test the steam line isolation circuitry associated with the containment pressure channel.

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, within 30 days of the date of the letter transmitting this Notice of Violation (notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (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. 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. Where good cause is shown, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

FOR THE NUCLEAR REGULATORY COMMISSION


David M. Verrelli, Chief
Reactor Projects Branch 1
Division of Reactor Projects

Dated at Atlanta, Georgia
this 5th day of March 1991