

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 April 11 - May 8, 1992, 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 (1992), the violations are listed below:

- A. Technical Specification 6.5.1.1.1.f requires Fire Protection Program procedures to be implemented. Fire protection procedure FP-005, attachment 7.1, section III, requires fire suppression systems be inhibited if necessary prior to performing hot work activities.

Contrary to the above, on April 15, 1992, Fire Protection Program procedure FP-005 was not implemented in that the north cable vault fire suppression system was not inhibited as specified on attachment 7.1, section III, prior to hot work authorization. This resulted in actuation of the north cable vault carbon dioxide fire suppression system.

This is a Severity Level IV violation (Supplement I)

- B. 10 CFR 50 Appendix B Criterion V requires that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions. Removal of components from a system which can affect the seismic qualification of a safety-related system is an activity affecting quality.

Contrary to the above, on April 21, 1992, activities affecting quality were not accomplished in accordance with established instructions (i.e., outage schedule) in that the A and B service water pump discharge check valves (SW-374 and 376, respectively) were removed from the service water piping before the core was fully unloaded. This resulted in the piping associated with the available train of service water being in a configuration other than that addressed in existing seismic analysis.

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

- C. 10 CFR 50 Appendix B Criterion III requires measures be established to assure that the design basis for systems and components are correctly translated into specifications, drawings, procedures, and instructions. A design basis

Carolina Power and Light Co. 2
H. B. Robinson

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

function for the Residual Heat Removal (RHR) system, as specified by GP-007 (Plant Cooldown From Hot Shutdown to Cold Shutdown) step 5.2.32.10, is the matching of the RHR heat exchanger outlet temperature within 25 degrees F of the Reactor Coolant System (RCS) temperature prior to placing the RHR system in service.

Contrary to the above, measures were not adequately established to assure that the design basis for the RHR system components were correctly translated into specifications, drawings, procedures and instructions in that modification M-1087 specified RHR system changes which would inadvertently remove the capability to warm the RHR heat exchanger outlet temperature to within 25 degrees F of the RCS prior to placing the RHR system in shutdown cooling.

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 U. S. 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.

Dated at Atlanta, Georgia
this 1st day of June 1992