

ENCLOSURE

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson

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

During an NRC inspection conducted on June 1-5, 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, the violations are listed below:

- A. TS 6.5.1.1.1 requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Revision 2, February 1978 in Section 7.e.1 recommends that procedures be written covering access controls to radiation areas including a Radiation Work Permit (RWP) System.

Plant Program Procedure (PLP-016), Radiation Work Permit Program, Revision 11, dated March 26, 1992, requires that all work performed in the radiologically controlled area (RCA) will be performed under a RWP and that it is the user's responsibility to perform his specific task under the appropriate RWP.

Health Physics Procedure (HPP-112), Use of HEPA Filtration Units and HEPA Vacuum Cleaners, Revision 3, dated July 2, 1991, requires that 1) personnel involved in HEPA filtration unit and vacuum cleaner emptying or filter changes will be briefed in the procedural and radiological requirements of the task; 2) activities will be performed under strict radiological controls with restrictions established in a special RWP; 3) all activities performed while a vacuum cleaner head/body seal is broken will take place in a room, containment, or tent established to control the spread of airborne radioactivity; and 4) any room, containment, or tent as described above will be equipped with a HEPA filter.

Contrary to the above, on June 2, 1992, the licensee failed to follow procedures associated with a contaminated HEPA filter change in that the individual performing the task was not on the appropriate RWP, was not briefed in the procedural and radiological requirements of the task, activities were not performed under strict radiological controls, activities were performed in a tent lacking integrity to control the spread of contamination, and the tent was not equipped with a HEPA filter.

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

- B. TS 6.5.1.1.1 requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Revision 2, February 1978 in Section 7.e.4 recommends that procedures be written covering contamination controls.

PLP-031, Contamination Monitoring Program for Personnel/Personal Effects, Revision 5, dated January 1, 1991 requires that workers perform a whole body frisk at the nearest frisking station immediately upon exiting a high contamination area.

Contrary to the above, on June 1, 1992, the licensee failed to follow procedures for personnel monitoring in that three workers failed to perform a whole body frisk at the nearest frisking station upon exiting the Spent Fuel Pool, a posted high contamination area.

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

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, D. C. 20555 with a copy to the Regional Administrator, Region II, 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 or Demand for Information 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 20 of July, 1992