

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson Unit 2

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

During the NRC inspection conducted on May 9 - June 27, 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 requires written procedures be established for activities referenced in Appendix A of Regulatory Guide 1.33, revision 2, February 1978. Appendix A paragraph 9 requires that maintenance which can affect the performance of safety related equipment be performed in accordance with written procedures appropriate to the circumstances. CM-303 was established to provide a written procedure for the installation of environmentally qualified taped splices. CM-508 was established to provide a written procedure to disassemble and reassemble the emergency diesel generator (EDG) fuel oil filter cartridge assembly.

Contrary to the above, maintenance procedures were not adequately established in that:

1. On June 16, 1992, CM-303 did not provide instructions to remove all non-qualified or braided jacket material from the splice area.
2. On May 26, 1992, the steps provided in CM-508 for the reassembly of the EDG fuel oil filter cartridge assembly were incorrectly sequenced. This contributed to the improper assembly of the B EDG fuel oil filter cartridge assembly and subsequent failure of the B EDG during testing.

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 appropriate to the circumstances. Modification M-1128 provided documented instructions for the reconfiguration of the safety injection cold leg injection containment isolation boundary.

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Contrary to the above, M-1128 did not provide instructions appropriate to the circumstances in that the modification created a potential for an unmonitored release pathway during normal operation.

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 23rd of July 1992