

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 September 5 - October 9, 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.a requires that procedures be established for activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A item 3.a requires instructions for draining the Reactor Coolant System (RCS). GP-008, Draining The Reactor Coolant System, revision 24, was established to provide instructions for draining the reactor coolant system (RCS).

Contrary to the above, on September 12, 1992, GP-008 was not adequately established in that the instructions provided did not contain precautions concerning vessel water level instrumentation errors that result from performing an inventory reduction with the RCS pressurized. Entrance into mid-loop operation with the RCS pressurized to 5 psig, as allowed by GP-008, would result in a loss of decay heat removal.

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

- B. Technical Specification 6.5.1.1.1.a requires that procedures be implemented for activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A item 3.a requires instructions for draining the RCS. GP-008, Draining The Reactor Coolant System, revision 24, was established to provide instructions for draining the RCS. Step 5.1.8 of GP-008 required that RCS level transmitters LT-403 and LT-404 and their associated alarm switches and indicators be calibrated in the last 30 days.

Contrary to the above, on September 12, 1992, GP-008 step 5.1.8 was not implemented in that the LT-403 and LT-404 calibration performed did not include the associated alarm switches and indicators. The level instruments were placed in use prior to the discovery of the incomplete calibration.

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

- C. Technical Specification 3.6.3.b requires that with one automatic isolation trip valve inoperable, isolate the affected penetration within 4 hours by use of a deactivated automatic valve(s) secured in the isolation position. RC-553 is an automatic isolation trip valve for the gas analyzer sample line containment penetration (P-1).

Contrary to the above, Technical Specification 3.6.3.b was not complied with in that on October 2, 1992, RC-553 was determined to be inoperable (would not open) during testing but the penetration was not isolated by use of a deactivated automatic valve within four hours. The valve was determined to be inoperable and a work request issued at 3:59 p.m.; however, RC-553 and its redundant containment isolation valve RC-516 were not deactivated until 9:16 p.m.

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 4th day of November 1992