

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 October 10 - November 13, 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.e requires that written procedures be established and implemented for the Emergency Plan. Emergency Plan implementing procedure PEP-101 step 5.1.4 requires that if an emergency action level (EAL) for an Unusual Event is exceeded, implement PEP-102, Emergency Control - Unusual Event. Unusual Event Matrix item D.1 of the EAL-2 Flowpath provides that the failure of any pressurizer relief valve to close following reduction of pressure constitutes a condition for an Unusual Event.

Operating procedure OMM-001, step 5.14.1 requires that shift operating personnel must consider control indications to be true unless they are proven to be incorrect.

Contrary to the above, on October 31, 1992, PEP-101 was not implemented in that an Unusual Event was not declared and therefore, PEP-102 was not implemented as required when Operations personnel observed indication that PCV-456, a pressurizer relief valve, did not fully close after reduction of pressure. Subsequently, PCV-456 was determined to have closed; however, at the time of the event and for a period of time afterwards, Operations personnel did not verify that the observed PCV-456 position indications were incorrect. Thus, based upon the requirements of OMM-001 to consider control indications true, the actions to be taken when a pressurizer relief valve failed to close were required to be implemented.

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

- B. Technical Specification 6.5.1.1.1 requires that procedures be established for activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A item 3.d requires procedures for the operation of the Emergency Core Cooling System (ECCS). OP-202 was established for the operation of the safety injection (SI) portion of the ECCS.

Contrary to the above, on September 5, 1992, OP-202, revision 26, was not adequately established in that Attachment 9.1 to OP-202 specified that valve SI-895K be open when the SI is in the standby mode. Positioning this valve in a normally open position would degrade the SI system's ability to mitigate the consequences of certain accidents and

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could potentially render the SI system incapable of performing its safety function.

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 at the facility that is the subject of this Notice, 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 a Demand for Information may be issued as to 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 27<sup>th</sup> day of November 1992