

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 15 - June 11, 1993, 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. 10 CFR 50.72 (b)(2)(vi) requires that the NRC be notified within four hours of any event for which notification to other government agencies has been made.

Contrary to the above, on May 25, 1993, the NRC was not notified within 4 hours of notification of South Carolina Department of Health and Environmental Control that weir discharge temperature limits had been exceeded.

This 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 5 requires written procedures for alarm conditions of safety-related annunciators. Appendix A, Items 1.d, 3.d, and 3.n require written procedures pertaining to procedure adherence, temporary procedure changes, operation of the emergency core cooling system, and operation of the chemical and volume control system, respectively.

Technical specification 6.5.1.1.5 requires that temporary changes to procedures, tests or experiments be approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator License. The temporary change must be documented and reviewed within 21 days to determine if the change constitutes an unreviewed safety question.

Annunciator panel procedure APP-036-H2 was established to provide operator actions for Boric Acid Heat Trace Trouble Alarms. The procedure requires in part, that responding personnel determine the cause of the alarm.

Operations Management Manual Procedure, OMM-001, Operations - Conduct of Operations, Section 5.9.2., Annunciator Panel Procedure Guidelines, provides guidance for implementing annunciator panel procedures and direction for unexpected alarm conditions for which annunciator procedures are not appropriate. The procedure requires in part, that responding personnel take corrective actions and document their conclusions regarding the alarm.

Administrative Procedure, AP-006, Procedure Adherence, states in section 5.1, that adherence to approved plant operating procedures is mandatory. Section 5.2 delineates the only three mechanisms through which a deviation from an approved procedure can occur; those being either a permanent procedure change, a temporary procedure change, or a procedure deviation in the case of an emergency.

Contrary to the above;

1. On May 20, 1993, procedures in response to a Boric Acid Heat Trace Trouble alarm on a Technical Specification required circuit were not implemented in that: Operations personnel failed to determine the cause of the alarm as required by APP-036-H2; failed to document their conclusions regarding the alarm as required by Section 5.9.2 of OMM-001; and failed to take corrective actions as required by Section 5.16 of OMM-001. As a result, a heat trace circuit was allowed to remain in alarm for approximately 6 hours.
2. On May 27, 1993, during the performance of Operations Surveillance Test Procedure OST-254, Residual Heat Removal System and RHR Loop Sampling Leak Test, control room operators did not follow the procedure in that when they were unsuccessful in getting valve HCV-142 to open when performing step 16 of section 7.1, they altered the chemical and volume control system's operation and configuration outside the scope of the applicable procedure; however, they did not initiate a temporary procedure change, nor discuss their actions with the shift supervisor.

This a Severity Level IV Violation (Supplement I).

- C. Technical Specification 6.5.1.1.1.a. requires that procedures be maintained for activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Item 9 requires written procedures for maintenance that can affect the performance of safety-related equipment. Implicit in these requirements is the requisite that the procedures be technically and administratively adequate.

Corrective Maintenance Procedure CM-008 (Steam Driven Auxiliary Feedwater Pump, Turbine, and Auxiliaries Maintenance) was established to provide maintenance instructions for the steam driven auxiliary feedwater pump.

Contrary to the above, corrective maintenance procedure CM-008 was inadequate in that on November 25, 1992, a precaution to test the overspeed trip setpoint following renewal of the trip striker pin or striker spring was erroneously deleted from the procedure.

This a Severity Level IV Violation (Supplement I).

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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 2nd day of July 1993