

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 July 10 - August 14, 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 Appendix B, Criterion III, Design Control, as implemented by the CP&L Corporate Quality Assurance Program requires in part that measures be established to assure that applicable regulatory requirements and the design basis, as specified in the license application, are correctly translated into specifications, drawings, procedures, and instructions of the type to ensure the design integrity of the structure, system or component; that measures be established to verify the adequacy of the design such as by suitable testing; and that design changes be subject to the design control measures commensurate with those applied to the original design.

Contrary to the above;

The licensee failed to implement adequate measures to maintain the integrity of the Reactor Auxiliary Building Ventilation System design in that modifications and design altering maintenance were implemented which ultimately resulted in the system being inoperable from January 1992 until July 1993.

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

- B. Technical Specification 6.5.1.1 Procedures, Tests and Experiments require in part that written procedures be established, implemented and maintained, covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev 2, 1978, including the operation of the auxiliary feedwater system, combatting emergencies/significant events, procedures for log entries, and procedures for the operation of the emergency diesel generators.

Operations Procedure OP 402, Auxiliary Feedwater System, requires in section 6.0, Normal Operations, step 6.1.1 that valves FCV-1424 and FCV-1425 be aligned in the closed position with the manual actuators disengaged and locked when placing the system in standby alignment.

Operations Management Manual OMM-009, Locked Valve List, which delineates those valves within the plant which are required to be locked, lists valves FCV-1424, FCV-1425 and PAV-35 as valves which are to be locked.

Operations Management Manual Procedure, OMM-023, Operator Logs and Rounds, requires that an operator perform a thorough general inspection of his assigned area and be knowledgeable of equipment parameters that are to be monitored.

Operating Procedure, OP-604, Diesel Generators "A" and "B", requires in part that the engine speed be raised to 900 RPM prior to flashing the field and contains a prohibition against operating an EDG at less than 900 RPM with field excitation in service.

Contrary to the above;

- a. On July 26 and July 30, 1993, respectively, resident inspectors found valves FCV-1424, FCV-1425 and PA-35 un-secured
- b. On July 27, 1993, an on duty reactor operator failed to detect ERFIS computer alarms associated with a deviation between the indicated position for control rod B-10 and its average bank position for a period of approximately 9.5 hours.
- c. On August 2, 1993, a reactor operator flashed the field of the A EDG at an indicated engine speed of approximately 750 RPM.

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

- C. Technical Specification 6.5.1.1 Procedures, Tests and Experiments require in part that written procedures be established, implemented and maintained, covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev 2. 1978, including general procedures for the control of maintenance work.

Plant Program, PLP-013, Maintenance Program, requires in part that shift supervisor permission be obtained before maintenance is performed on any safety-related equipment.

Contrary to the above, on August 2, 1993, personnel initiated maintenance on the south, control room door without obtaining the shift supervisor's permission. This resulted in the door, as well as the control room ventilation system, being declared inoperable.

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

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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 10th day of September 1993