

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 12 - October 16, 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. Technical Specification 6.5.1.1, Procedures, Tests, and Experiments requires, 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. Paragraph 4 of Appendix A requires instructions for operation of onsite electrical systems. Also Paragraph 9 of Appendix A requires that maintenance be performed in accordance with written procedures.

Operating Procedure, OP-603, Electrical Distribution, provides the instructions for operation of onsite electrical systems.

Special Procedure, SP-1231, Steam Generator Sludge Lance and Inspection, provides the instructions for conducting sludge lancing of steam generator secondary sides.

Contrary to the above;

1. On September 19, 1993, an operator deviated from OP-603 while transferring service water pump D from normal to emergency power. As a result of this deviation, power was lost to motor control center, MCC-5.
2. On September 21, 1993, a vent path to atmosphere was not identified and caution tagged as required by SP-1231. As a result, a vent valve on the sludge lancing rig was open and a vent path from the containment existed.

This is a Severity Level IV violation (Supplement 1).

- B. Technical Specification 3.8.1., requires that the equipment hatch be "properly closed" during refueling operations. Implicit in this requirement is the requisite that the hatch be capable of performing its intended safety function, which in this case, is to prevent the release of radioactive material to the environment in the event of a fuel handling accident or a prolonged loss of core cooling.

Technical Specification 6.5.1.1, Procedures, Tests, and Experiments requires, 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. Appendix A, Section 3.f(1) requires instructions for maintaining containment integrity. Implicit

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in this requirement are the requisites that the procedures be adequate to facilitate the applicable evolution and that personnel use the procedures during the performance of the evolution.

Operation Management Manual, OMM-33, Implementation of Containment Vessel Closure provides instructions for installing the equipment hatch to support refueling operations.

Contrary to the above, on September 23, 1993, the licensee did not use a procedure to facilitate the re-installation of the containment building equipment hatch when they were preparing for refueling operations. This resulted in the inadequate installation of the equipment hatch which in turn allowed in the execution of refueling operations without having established containment integrity.

This is a Severity Level IV violation (Supplement 1).

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, D.C. 20555 with a copy to the Regional Administrator, Region II, 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 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 8th day of November 1993