

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company  
H. B. Robinson Steam Electric Plant

Docket No. 50-261  
License No. DPR-23

During an NRC inspection conducted on October 25-29, 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 (TS) 6.5.1.1.1 (a) requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, dated February 1978.

Section 7 of Regulatory Guide 1.33, Appendix A, Revision 2, dated February 1978, recommends that procedures be written covering control of radioactivity for the purpose of limiting materials released to the environment and limiting personnel exposure.

Section 6.8 of Fuel Management Procedure, FMP-021, Control of Material in the Spent Fuel Pool, Revision 0, dated December 20, 1991, states that "materials suspended from the side of the spent fuel pool shall be tied off/attached to stainless steel material and shall be connected to a locking device that is controlled by the health physics group. This is to avoid inadvertent removal of these materials from the spent fuel pool."

Contrary to the above, the licensee failed to follow Section 6.8 of Procedure FMP-021. During the period of approximately October 20 through 26, 1993, a piece of an activated reactor coolant pump bolt contained within a basket, measuring approximately 650 rem/hour contact with the bolt, was suspended from the side of the spent fuel pool by a rope. There was no stainless steel material connected to a locking device controlled by the health physics group to avoid inadvertent removal of the bolt from the spent fuel pool.

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

- B. TS 6.11 requires that procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Administrative Procedure, AP-031, Administrative Controls for Entry into Locked High Radiation Areas, Revision 17, dated March 11, 1993, details the requirements associated with Locked High Radiation Areas, Restricted High Radiation Areas, and Very High Radiation Areas. Section 3.4 states that "the Radiation Control Supervisor is responsible for issuing master locked high radiation area and locked high radiation area keys."

Section 3.5 states that "the Unit 2 Operations Shift Supervisor is responsible for administratively controlling locked high radiation area keys maintained for emergency use."

Contrary to the above, the licensee failed to follow Sections 3.4 and 3.5 of Procedure AP-031 as follows:

1. As required by Section 3.4 of Procedure AP-031, the Radiation Control Supervisor failed to issue new locked high radiation area keys to the Unit 2 Control Room in a timely manner following re-keying of the locks on September 23, 1993. Therefore, for the period September 23 through October 26, 1993, when identified during the onsite inspection, the Control Room did not possess operable keys for locked high radiation area access if needed to respond to an emergency situation (e.g., End Path Procedure, EPP-9, Transfer to Cold Leg Recirculation, Revision 12, dated March 31, 1993).
2. The Unit 2 Operations Shift Supervisor failed to maintain administrative control of the Control Room locked high radiation areas keys as required by Section 3.5 of Procedure AP-031 in that on two occasions personnel were issued keys to perform non-emergency, routine activities. Specifically, on September 17, 1993, key No. 180 was issued to a fire protection worker and on September 21, 1993, key No. 178 was issued to an Instrument and Control Technician.

This is a Severity IV violation (Supplement IV).

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, 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 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 26<sup>th</sup> day of Nov., 1993