

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light
H. B. Robinson 2

Docket Nos. 50-261
License Nos. DPR-23

During an NRC inspection conducted March 14-25, 1994, 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 II, "Quality Assurance Program," and the approved corporate Quality Assurance Program, Section 13.0, "Assessments," collectively require that the licensee establish at the earliest practical time, consistent with the schedule for accomplishing the activities, a quality assurance program which complies with the requirements of this appendix. This program shall be documented by written policies, procedures or instructions and shall be carried out throughout plant life in accordance with those policies, procedures, or instructions. The applicant shall identify the structures, systems, and components to be covered by the quality assurance program and the major organizations participating in the program, together with the designated functions of these organizations. The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components, to an extent consistent with their importance to safety. Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanness; and assurance that all prerequisites for the given activity have been satisfied. The program shall take into account the need for special controls, processes, test equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection and test. The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. The applicant shall regularly review the status and adequacy of the quality assurance program. Management of other organizations participating in the quality assurance program shall regularly review the status and adequacy of that part of the quality assurance program which they are executing.

Contrary to the above, the Quality Assurance Organization failed to provide control over activities affecting the quality of the identified structures, systems, and components, in that in 1989, the results of an NRC inspection of Emergency Operating Procedures (EOPs) identified that the EOPs, EOP support procedures and EOP program were deficient, but despite the results of this inspection, the Quality Assurance Organization failed to audit the area, nor was any licensee action taken to assure that these areas were inspected by Quality Assurance and the necessary corrective actions implemented. The only documented Quality Assurance action in this area was a field note which identified problems with EOP setpoints, but failed to ensure corrective actions and was deleted from permanent plant records after 12 months.

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

- B. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," and the approved corporate Quality Assurance Program, Section 6.0, "Procedures and Drawings," collectively require that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, procedures and drawings were not appropriate quantitatively or qualitatively for activities affecting safety and were not maintained as evidenced by the following examples:

1. During simulator scenarios, steps in the site-specific Emergency Operating Procedures (EOPs) were not accomplished in accordance with the approved mitigation strategy. For example, during the Steam Generator Tube Rupture with a Main Steam Line Break scenario, all the Main Steam Isolation Valves were closed before entering the diagnostic portion of the EOPs. This resulted in loss of the primary heat removal system and potentially uncontrolled, unmonitored releases through the Main Steam Line Power Operated Relief Valves. Also, during the Station Blackout, the Emergency Diesel Generators (EDGs) were allowed to run without adequate cooling for an extended period of time, even though both the high coolant temperature and the high lube oil alarms for EDG "B" were lit. If the mitigation strategy of EPP-1 had been followed, EDG "B" would have been shutdown substantially sooner. Deviation from the EOP network step sequences was an accepted plant practice and allowed by OMM-022, "Emergency Operating Procedures User's Guide."
2. The extensive use of cross references in procedures resulted in procedures that could not be performed as written. All prerequisites in referenced procedures were often not applicable and if prerequisites were met, in some cases, it would have resulted in incorrect equipment configurations or unacceptable delays in the accident mitigation strategy performance.
3. Twenty safety-related power supplies that were used in EOP and Reactor Protection System instrument loops were of a different type and a lower voltage rating than the power supply depicted on the drawings and used by the setpoint vendors. These included Pressurizer Pressure, Pressurizer Level, and Steam Generator Level power supplies.

4. The Station Blackout procedure (EPP-1) used 10 percent Condensate Storage Tank level as the setpoint for switching to alternative supply, while the Station Blackout Coping report required 34 percent Condensate Storage Tank level.

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

- C. 10 CFR 50, Appendix B, Criterion VI, "Document Control," and the approved corporate Quality Assurance Program, Section 6.0, "Procedures and Drawings," collectively require that measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed at the location where the prescribed activity is performed. Changes to documents shall be reviewed and approved by the same organizations that performed the original review and approval unless the applicant designates another responsible organization.

Contrary to the above, the licensee failed to establish control over the issuance of procedures which prescribed activities affecting quality, in that controlled copies of AOP-004, "Control Room Inaccessibility," PEP-104, "Emergency Control - Site Area Emergency," APP-048, "Main Control Room HVAC System Panel," OST-010, "Power Range Calorimetric During Power Operation Daily," and OST-551, "Turbine Valve & Trip Functional Test," were either of the wrong revision or were missing pages. These copies included the Emergency On-site Facility copies. The condition of the copies made the procedures unusable.

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

- D. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," Section 12.0, "Conditions Adverse to Quality and Corrective Actions," requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to prevent repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective actions taken shall be documented and reported to appropriate levels of management.

Contrary to the above, setpoints provided by a contractor have not been validated by the licensee as being correct but were incorporated in the EOPs, and numerous weaknesses in the Emergency Operating Procedures (EOPs), EOP program and EOP support procedures that were identified in a previous NRC inspection (NRC Inspection Report No. 50-261/89-16) have not yet been resolved. These weaknesses include (1) needed equipment for some required actions is not prestaged, mentioned in the procedures, or always easily available, (2) the plant verification and validation

process continues to be inadequate, (3) no process has been established to ensure that changes to equipment or other procedures that affect the EOPs and EOP support procedures are identified and result in the necessary procedure revisions, (4) no requirement for in-plant walkthroughs of procedures has been incorporated into the governing EOP program documents, (5) staffing for all disciplines who must perform actions in the EOPs and support procedures (e.g., Instrument and Controls, chemistry) is not provided round the clock, and (6) independent job performance aids for Auxiliary Operators who must perform multiple local actions have not been developed for actions other than a few in the dedicated shutdown procedures.

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 for items A, B, C, and D, 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. 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 in 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 7 day of April, 1994