

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 April 24 - May 21, 1994, violations of the 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. TS 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, including procedures for the control of measuring and test equipment and maintenance of safety related equipment.

Work Request/Job Order, WR/JO 94-AEBT1 was provided to troubleshoot and repair the control room differential pressure instrument DPI-6520. This instrument is used to verify that control room ventilation equipment performance complies with Technical Specification requirements.

Work Request/Job Order, WR/JO 94-ACYRI was provided to calibrate the boric acid storage tank A temperature controller and alarm.

Corrective maintenance procedure, CM-507, Emergency Diesel Generator Lube Oil Strainers, provides instructions for the disassembly, inspection and reassembly of the emergency diesel generator lube oil strainers.

Contrary to the above;

1. WR/JO 94-AEBT1 was inadequate in that, it did not provide adequate instructions for ensuring that control room differential pressure instrument DPI-6520 was properly initialized following maintenance. As a result, the instrument was returned to service following maintenance on April 27, 1994, with an erroneous indication of control room pressure.
2. On April 12, 1994, WR/JO 94-ACYRI was implemented incorrectly in that the maintenance technician assigned to perform the calibration of the A boric acid storage tank temperature controller and alarm, erroneously commenced work on the B boric acid storage tank temperature controller.
3. On April 25, 1994, CM-507 was not properly implemented in that the lube oil strainer on the B emergency diesel generator was improperly re-assembled. This occurred when the maintenance technicians failed to install the pressure plate washer as required by step 7.3.10 of the procedure.

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

- B. TS 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, including procedures for operating emergency core cooling system components.

Operating Procedure, OP-202, Safety Injection and Containment Vessel Spray System, provides instructions for draining the Safety Injection Accumulators.

Contrary to the above, on April 30, 1994, OP-202 was improperly implemented during efforts to drain Safety Injection Accumulator B in that the drain valve for accumulator A was opened. As a result, safety injection accumulator A was inadvertently drained below the minimum technical specification level.

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

- C. 10 CFR 50 Appendix B, Criterion XVI requires in part that measures be established such that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and non-conformance are promptly identified and corrected.

Contrary to the above, on May 4, 1994, control room operators failed to take prompt corrective actions after being provided with chemistry sample results which indicated that the boric acid concentration in the A BAST was in excess of the concentration allowed by Technical Specification 3.2.2.c. The fact that the boric acid concentration was in excess of the maximum allowable concentration went unrecognized for almost seven hours.

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 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 15th day of June 1994