

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 October 23 - December 3, 1994, two 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 3.15.1 requires the control room air conditioning system be operable during all modes of plant operation, including two trains of active safety-related components and shared safety-related passive components.

Technical Specification 6.5.1.1.1 requires, in part, that procedures be established, implemented, and maintained covering the operation of the control room heating and ventilation system.

Operations surveillance test procedure OST-750, Control Room Emergency Ventilation System, requires in step 7.2.1 that HVA-1B be verified to be OFF but does not require the operator to take the switch to the STOP position.

Contrary to the above, on November 11, 1994, an operator failed to follow the requisites of operations surveillance test OST-750, Control Room Emergency Ventilation System, when he placed the control switch of idle control room air conditioning system fan HVA-1B in STOP when the procedure required that he verify that the fan was OFF. This mis-configuration resulted in the B train of the system being inoperable for four days, and rendered the system incapable of performing its intended safety function, assuming an active single failure.

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

- B. 10 CFR 50, Appendix B, Criterion II, Quality Assurance Program, requires in part that the licensee's quality assurance program provide control over activities affecting the quality of structures, systems, and components, to an extent commensurate with their importance to safety, including the use of appropriate equipment and the assurance that all prerequisites have been identified and satisfied. Further, the program is required to take into account the need for special controls, test equipment, and the need for verification of quality by inspection or test.

Contrary to the above, on November 28, 1994, the controls established by the licensee to manage the power range calorimetric program were found to be inadequate in that the program included the use of uncalibrated instrumentation, failed to control the plant condition prerequisites

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under which the calorimetric program results were valid, failed to specify a method or timing for acquiring manually input data; lacked verification of automatically input data, and did not consistently control the instruments used in the calorimetric.

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 29th day of December 1994

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