

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson Unit 2

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

During an NRC inspection conducted on March 19 - April 22, 1995, 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 6.5.1.1.1, Procedures, Tests, and Experiments, states that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978, including the operation and surveillance testing of the Emergency Core Cooling System.

1. Operations Surveillance Test Procedure OST-254, Residual Heat Removal and RHR Loop Sampling System Leak Test, provides the instruction necessary for operators to determine the system-to-atmospheric leakage of that portion of the Residual Heat Removal System outside the reactor containment.

OST-254 requires in step 7.1.2 that operators verify that the RHR System is aligned for standby low pressure injection in accordance with Operating Procedure OP-201, Residual Heat Removal System. Operating Procedure OP-201 requires in step 6.2.2.1 that valve RHR-757D be locked closed when the system is aligned for standby low pressure injection.

Contrary to the above:

On April 11, 1995, operators failed to follow procedure OST-254 in that they did not verify the RHR system to be aligned for standby low pressure injection. Valve RHR-757D was found 1/4 turn open.

2. Plant Programs Procedure PLP-037, Conduct of Infrequently Performed Tests or Evolutions provides guidance for the identification and conduct of infrequently performed tests or evolutions which have the potential to place plant equipment and operators outside the bounds of normal operational procedures and training.

PLP-037 requires in step 5.3.2.2 that the Management Designated Monitor brief both the operating crew and test personnel on management expectations prior to the performance of the test or evolution.

Contrary to the above:

On April 11, 1995, the Management Designated Monitor did not brief the operating crew of management expectations prior to the performance of OST-254.

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

- B. Technical Specification 6.5.1.1.1, Procedures, Tests, and Experiments, states that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978, including procedures for performing maintenance on safety related equipment.

Maintenance Management Manual Procedure, MMM-003, Appendix A, Post Maintenance Testing requires that maintenance planners identify post maintenance testing based on a review of testing requirements specified in the attachment to MMM-003 Appendix A.

Contrary to the above:

On April 6, 1995, a maintenance planner failed to consult the attachment to MMM-003 Appendix A, while determining the post maintenance testing requirement following the replacement of a safety-related breaker. As a result, the testing designated in MMM-003 was not included in the post maintenance testing requirement for the breaker.

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

- C. 10 CFR 73.21 (d) requires that matter containing Safeguards Information shall be under the control of an authorized individual while in use, and stored in a locked security storage container while unattended.

Contrary to the above:

On April 5, 1995, it was determined that the licensee did not preserve control of the Safeguards Information stored in the Shift Supervisor's Office in that the licensee did not store the Safeguards Information in a locked security storage container when the Safeguards Information was unattended.

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 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. Your response may reference or include previous docket correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a 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 19th day of May 1995