

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 April 23 - May 13, 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. 10 CFR 50 Appendix B, Criterion VII, Control of Purchased Material, Equipment, and Services, requires in part, that measures be established to ensure the quality of purchased services. Implicit in this requirement are the requisites that contracted service personnel who perform activities affecting quality, be indoctrinated and trained as necessary to assure that they achieve and maintain a suitable proficiency, and that they accomplish activities affecting quality in accordance with instructions, procedures or drawings of a type appropriate to the circumstances.

Contrary to the above, the measures established by the licensee to ensure the quality of purchased services were inadequate in that:

- 1) On May 8, 1995, a contracted refueling technician failed to follow procedure FHP-001, Fuel Handling Tools Operating Procedure, regarding the orientation of a thimble plug tool he was using. Ultimately, this resulted in his failure to successfully perform nineteen steps of procedure FMP-19, Fuel And Insert Shuffle.
- 2) On May 3, 1995, a contracted refueling technician did not verify polar crane/refueling manipulator crane clearance after he relocated the latter; the contracted polar crane operator had not been trained on Maintenance Instruction MI-510, Polar Crane General Instructions; the contracted polar crane operator had not received a cogent proficiency verification on the polar crane's operation; and the polar crane operator did not verify the position of the refueling manipulator crane before moving the polar crane. Ultimately, this resulted in the polar crane colliding with the refueling manipulator crane, causing significant structural damage to the latter.
- 3) On May 4, 1995, the contracted polar crane operator moved the polar crane on his own initiative, with no communication or direction from the signalman, from a position in which he could not see the auxiliary hook. This resulted in the auxiliary hook striking the concrete cubicle surrounding the top of the "C" steam generator.

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 surveillance testing of the emergency core cooling system. Implicit in this requirement, is the requisite that these procedures be of a type appropriate to the circumstances, with appropriate acceptance criteria for determining that important activities have been satisfactorily accomplished.

Operations Surveillance Test Procedure, OST-156, Safety Injection and Containment Spray Systems Suction Lines Leak Test, is provided to perform leak checks of a portion of the emergency core cooling system.

Contrary to the above, on May 8, 1995, OST-156 was inadequate in that valves SI-887, RHR Pump Discharge To SI and CV Spray Suction and SI-862A, RHR to RWST were closed instead of open. As a result, two portions of the emergency core cooling system were not leak checked during the performance of OST-156.

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 docketed 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 12th of June 1995

ENCLOSURE 1