

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 May 14 - June 17, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure For NRC Enforcement Actions," 60 FR 34381, June 30, 1995, the violations are listed below:

- A. Technical Specification 6.5.1.1.1, Procedures, Tests, and Experiments, requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978, including procedures for equipment control, operating the main steam generating system ...

Operations Management Procedure OMM-005, Clearance And Test Request, requires that during a clearance cancellation, the clearance form be initialed by the restorer and verifier as components are restored, and that a licensed operator verify that all clearance tags are accounted for prior to signing that the clearance has been removed.

Local Clearance and Test Request 95-F0476 prepared in accordance with Operations Management Procedure OMM-005, Clearance And Test Request, specified a clearance information tag be affixed to the Containment Fan Cooler Number 2 (HVVH-2) control switch on the Reactor and Turbine Generator Board (RTGB) to warn the operators of the equipment status.

Operating Procedure OP-406, Steam Generator Blowdown/Wet Layup System, provides instructions for draining the steam generators. This procedure requires that the steam generator low and low-low level signals to the motor driven auxiliary feedwater pump auto start logic be blocked by positioning 4 key switches to the "defeat" position prior to draining steam generators.

General Operating Procedure GP-002, Cold Shutdown To Hot Subcritical At No Load TAVG, requires in Initial Condition 5.1.4 that valve RHR-743 be opened.

Operations Procedure OP-201, Residual Heat Removal System, provides instructions for filling, venting and placing the Residual Heat Removal (RHR) pumps in service.

Operations Management Procedure OMM-005, requires, in part, that when a clearance is placed, that all valves necessary to protect personnel and equipment are properly closed or open as necessary.

Contrary to the above:

1. On May 2, 1995, OMM-005 was not followed in that an auxiliary operator and independent verifier initialed local clearance and test request number 95-F0013 to indicate that tag number 20 on valve SI-883R had been removed and the valve opened. A licensed

senior reactor operator also signed the clearance to indicate his verification that all tags removed from this clearance had been accounted for. On May 26, 1995, valve SI-883R was found shut with the clearance tag still attached.

2. On May 26, 1995, it was determined that Local Clearance And Test Request 95-F0476 was not properly implemented in that the required clearance information tag was not affixed to the RTGB. As a result, HVH-2 was operated with its air flowpath isolated.
3. On June 14, 1995, the motor driven auxiliary feedwater pump auto start logic block key switches were not positioned to the "defeat" position prior to draining steam generators. As a result, both motor drive auxiliary feedwater pumps started and the steam generator blowdown insulation valves shut when the level in steam generator B reached the low-low level setpoint.
4. On June 3, 1995, control room operators performed procedure step 5.4.5.6 of procedure GP-002 to depressurize and cooldown the "A" train of the Residual Heat Removal (RHR) System with valve RHR-743 closed. The procedure requires in Initial Condition 5.1.4 that valve RHR-743 be opened. This resulted in the A RHR pump being operated for 66 minutes with no appreciable flow, and ultimately lead to the pump being declared inoperable.
5. On June 9, 1995, Operating Procedure OP-201 was inadequate in that it did not align the system to facilitate a flow path for the A RHR pump before having the operator start it. This resulted in the operator starting the pump with no flow path.
6. On April 17, 1995, clearance LCTR 95-00748 was inadequate in that it did not specify a position for valve MS-20. This alignment did not protect personnel or equipment in that it resulted in an inadvertent operation of the steam driven auxiliary feedwater pump.

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

- B. 10 CFR 50 Appendix B Criterion XIV Inspection, Test, and Operating Status requires, in part, that measures be established for indicating the operating status of structures, systems, and components to prevent inadvertent operation.

Contrary to the above, on May 29, 1995, the measures established to indicate the status of the B RHR pump motor breaker status were inadequate in that the pump motor was inadvertently started during corrective maintenance.

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.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 17th of July 1995

ENCLOSURE 1