

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Units 1 and 2

Docket Nos.: 50-325 and 50-324
License Nos.: DPR-71 and DPR-62

During an NRC inspection conducted on December 6-15, 1993, 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 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33, November 1972. Included in the covered activities are maintenance procedures and instructions.

Contrary to the above,

1. Preventive maintenance procedure OPM-FLT508, Diesel Generator Starting Air and Control Air Filters, was not adequately maintained, in that torque specifications for the control air moisture-trap cap screws (obtained from the vendor on November 12, 1993, to preclude recurring gasket failures) were not included as of December 11, 1993. As a result, the control air moisture-trap associated with EDG 4 was reassembled on November 29, 1993, with technically deficient cap screw torque. This condition went undiscovered until NRC intervention on December 10, 1993.
2. As of December 11, 1993, Preventive Maintenance Routes IMSLAAC and IMSLAAB (Filter Inspection/Replacement On Starting/Control Air For EDGs 1 and 2, respectively) were not adequately maintained, in that both required inspection/replacement of a Hankison Dehydrfilter which no longer exists. This component was eliminated from the control air systems of EDG 1 and 2 on July 17, and October 5, 1993, respectively.
3. On December 14, 1993, maintenance instructions provided in Work Request/Job Order 93-BFLR2 (Troubleshoot Service Water Pump A Discharge Valve 2-SW-V14) were not adequately established, in that motor operator valve coupling replacement instructions did not reflect required torquing.

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

- B. Technical Specification 6.8.1.a. requires that written procedures shall be established, implemented, and maintained as recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. Paragraphs A.3 and A.4 of Regulatory Guide 1.33 recommend procedures for equipment control, temporary changes, jumper control and administrative procedures.

Instruction OI-13, Valve and Electrical Lineup Administrative Controls, Operating Procedure Step 4.6, requires that all valves will be maintained in the position required for the Operating Procedure (OP) valve lineup. It further states that if a valve is being operated in the course of an approved procedure it will be returned to its OP lineup position when the procedure is completed.

Plant Procedure PLP-22, Temporary Modifications, Step 5.6, closeout, requires that temporary modifications (TPM) sketches be removed from the control room drawings when the TPM is closed.

Plant Notice PN-30, Integrated Recovery Methodology, Step 6.7.5, requires that for open items, the outage scope deletion form shall be used for the deletion of an item that is in the integrated startup schedule.

Administrative Instruction AI-59, Jumpering and Wire Removal, Step 5.3, requires that after the completion of the job, the wire is reconnected, the jumper and wire removal tags shall be attached to the work request (if contaminated, tags should be disposed of properly and explanation attached to the work request).

Contrary to the above:

1. On December 9, 1993, valve 1E41-F036 had not been returned to its OP valve lineup position upon completion of special procedure 1-SP-93-070, RCIC/HPCI Low Pressure Testing Using Auxiliary Steam. Based on this finding, the licensee identified three additional valves that had not been returned to their OP valve lineup positions.
2. On December 11, 1993, a TPM (1-92-0336) sketch was not removed from the Unit 1 Core Spray drawing D-25024 following closeout of the TPM on September 30, 1993. The licensee conducted an audit of temporary modifications on December 13, 1993, and identified additional problems with control of TPM sketches.
3. Open Item 93-ATDD1, Drywell Fan Isolators, was deleted from the startup schedule without completing the outage scope deletion form.
4. As of December 10, 1993, several jumper and wire removal tags in the Unit 1 drywell were not properly removed after work had been completed.

This is a Severity Level IV violation (Supplement 1).

- C. 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, states in part, Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations,

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defective material and equipment and nonconformances are promptly identified and corrected.

Contrary to the above, the corrective actions for violations B.1, for NRC inspection Report 50-324/93-201, dated June 23, 1993, were inadequate, in that on December 14, 1993, an unauthorized operator aid (span gas data sheets) was identified on the drywell hydrogen and oxygen monitor, CAC 4409 and 4410. The data sheets were unauthorized due to the cancellation of Maintenance Procedure OMI-16-040A, Replacement of CAC-QT-4409/4410 Calibration Gas Cylinders, on November 2, 1993.

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 or 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 13th day of January 1994