

APPENDIX A
NOTICE OF VIOLATION

Carolina Power & Light
H. B. Robinson 2

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

As a result of the inspection conducted on May 11 - June 10, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification 6.8.1 requires that written procedures shall be implemented. The control of drawings required by 10 CFR 50 Appendix B, Criterion VI, is implemented by Section 6 of the Corporate Quality Assurance Program which requires that superceded drawings be controlled to prevent inadvertent use, that accurate drawings are available in the field, and that a master list of current drawings be updated and distributed to preclude use of superceded documents. The H. B. Robinson drawing control program is implemented by Volume 1 Section 9, Volume 20 Procedure ENG-4, and Volume 21 Procedure DC-1 of the Plant Operating Manual which require that measures be established and implemented to control the issuance of drawings and drawing revisions and assure that these drawings and revisions are accurate, properly distributed, and used at the location where prescribed activities are performed.

Contrary to the above, as of May 14, 1982, drawing control procedures were not implemented resulting in the failure to maintain complete and current controlled drawings for use in the plant, failure to notify all holders of controlled drawings of revisions, failure to distribute new or revised controlled drawings reflecting modifications to or installation of operable systems important to safety, and failure to control all drawings located and used in the plant. This violation was previously cited in Appendix A of Inspection Report 50-261/81-12 dated May 11, 1981.

This is a Severity Level IV Violation (Supplement I.D.2.).

- B. Technical Specification 6.8.1 requires that written procedures shall be established and maintained that meet or exceed the requirements and recommendations of Section 5.2 and 5.3 of ANSI N18.7-1976 and Appendix A of USNRC Regulatory Guide 1.33 Rev 2.

Contrary to the above, as of May 14, 1982, the requirement to maintain and use accurate operating procedures was not fully implemented in that operating procedure valve checkoff lists for the reactor coolant system, safety injection, containment spray system, waste disposal system, service water system, and chemical and volume control system did not include all valves, handled instrument valves inconsistently, gave incorrect valve descriptions, and gave incorrect valve numbers, and some procedures did not return the system to normal after an evolution.

This is a Severity Level IV Violation (Supplement I.D.2.).

- C. Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements of Section 5.2 of ANSI N18.7-1976. The requirements of Section 5.2.14 of ANSI N18.7-1976 and 10 CFR 50 Appendix B, Criterion XIII, concerning measures to control storage and preservation of quality controlled material and equipment, are implemented by Section 5.3 of the Corporate Quality Assurance Program (CQAP). The CQAP requires that such material and equipment held in storage be controlled to prevent deterioration and incorporates the requirements of ANSI N45.2.2-1972, Section 6.4.2. Additionally, stock items must be monitored to assure that perishable items are removed and controlled for proper disposition at the end of their shelf-life.

Contrary to the above, as of May 21, 1982, quality controlled material and equipment storage procedures were not established or implemented in that:

1. Preventive maintenance procedures for proper maintenance during storage had not been established or implemented for the insulation resistance testing and for the rotation of the shafts of Q-list electrical motors in storage.
2. Shelf life procedures of Storeroom Procedure SR-3 did not control Q-list shelf life items, such as valve diaphragms and chemicals, which had been received either before the procedure was implemented or received without required shelf-life specifications.

This is a Severity Level IV Violation (Supplement I.D.2.).

- D. Technical Specification 6.8.1 requires written procedures to be implemented that meet the requirements of Appendix A Regulatory Guide 1.33 dated February, 1978.

Contrary to the above, procedures for the control of radioactivity were not followed in that:

1. HP-11 Survey Instrument Calibration Revision 11 step 3.1.1 states each Beta-gamma survey instrument shall be calibrated every 90 days \pm 23 days. On May 19, 1982 a frisker number 14092, was being used in the hot machine shop with a calibration due date of April 9, 1982.
2. HP-28 Control of Personnel Contamination and Decontamination Techniques Revision 2 step 3.1.2 states when exiting a monitoring station all personnel are responsible for frisking. Step 3.1.3 requires the instrument to have an alarm setpoint 100 cpm above background. On May 17, 1982 two individuals exiting the protected area used instruments which were turned off.

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

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Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: JUL 14 1982