

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick 1 and 2

Docket Nos. 50-325 & 50-324
License Nos. DPR-71 & DPR-62

As a result of the inspection conducted on July 12-16, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

10 CFR 50, Appendix B, Criterion XIV and the Accepted Quality Assurance Program (letter to Eisenhut from Utley, Serial Number OQA-81-026, dated March 18, 1981) requires that measures provide for identification of items which have satisfactorily passed required inspections and tests, where necessary to preclude inadvertent bypassing of such inspections and tests. The Accepted Quality Assurance Program endorses Regulatory Guide 1.33, 1972, and ANSI N18.7-1976. Section 5.2.6 of ANSI N18.7 requires when equipment is ready to be returned to service, operating personnel shall place the equipment in operation and verify and document its functional acceptability. Corrective Maintenance Procedure MP-14 implements this requirement by having the Shift Foreman identify on the work request all testing that will be required to demonstrate operability following maintenance.

1. Contrary to the above, eight work requests associated with corrective maintenance which had been performed on containment isolation valves were reviewed and testing to be performed following maintenance was not specified. On each work request, the space provided for required testing had been marked not applicable by a Shift Foreman. Four of the eight valves were returned to service without operability testing. All eight work requests were signed by a Shift Foreman signifying final acceptance of the work and satisfactory demonstration of valve acceptability.
2. Contrary to the above, measures have not been established to assure that all required testing will be performed at a later date when conditions do not permit appropriate testing at the time maintenance work is completed. As indicated in item 1 above, existing measures did not preclude bypassing required tests.

This is a Severity Level 1 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 violation; (2) the reasons for the violation 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: August 17, 1982