

APPENDIX A
NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Steam Electric Plant 2

Docket Nos. 50-324
License No. DPR-62

As a result of the investigation conducted on September 15 - October 15, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification 6.8.1.2 requires that written procedures shall be implemented covering activities specified in Appendix A of Regulatory Guide 1.33, November 1972. Item F.2. requires procedures for loss of flux indication. Procedure EI-13, SRM or IRM Neutron Monitoring System Failure step 3.2.1.8, requires that Technical Specification be consulted if more than 2 SRMs are inoperative. Technical Specifications 3.3.5.4.b requires that when two or more SRMs are inoperable, lock the reactor mode switch in the shutdown position within one hour.

Contrary to the above, on October 12, 1982 Technical Specifications were not consulted for loss of SRM in that reactor mode switch was placed in the shutdown position within one hour, but was not locked as required by Technical Specification 3.3.5.4.b. This condition existed for one hour and forty-five minutes before the SRM's drive power was restored and the SRMs were inserted.

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

- B. Technical Specification 6.8.1.a requires that written procedures shall be established covering activities specified in Appendix A of Regulatory Guide 1.33, November 1982. Item 3, of the guide, requires procedures for startup, operation and shutdown of safety-related BWR systems.

Contrary to the above, adequate procedures were not established for the operation of safety-related instrumentation in that a valve required for the proper alignment of containment isolation switches B21-PS-N056 C and D was not addressed in its controlling procedure OP-30.

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

- C. Technical Specification 3.3.2, Table 3.3.2-1 item 1.e., requires the condenser vacuum-low isolation actuation instrumentation to be operable in conditions 1 and 2 with reactor steam pressure greater than 500 psig.

Contrary to the above, on September 3, 1982 with reactor in condition 2 and reactor steam pressure at 548 psig, the condenser vacuum - low isolation

actuation instruments were inoperable in that the instrument bypass switches were found in the bypass position.

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

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: OCT 29 1982