

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Co.
H. B. Robinson

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

As a result of the inspection conducted on September 20-24, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

A. Technical Specification 6.5.3.1 requires that the Performance Evaluation Unit of the Corporate Quality Assurance Department perform audits of plant activities. Specific audit subjects are defined in Specification 6.5.3.2.d.

1. Technical Specification 6.5.3.2.d(5) requires an audit of the Emergency Plan and implementing procedures at least once per 24 months.

Contrary to the above, this audit requirement was not performed at least once per 24 months. Audit QAA/20-19 conducted October 15-19, 1979, and Audit QAA/20-29 conducted July 12-16, 1982, performed this function. These audits were conducted 34 months apart.

2. Technical Specification 6.5.3.2.d(7) requires an audit of the Facility Fire Protection Program and implementing procedures at least once per 24 months.

Contrary to the above, this audit requirement was not performed at least once per 24 months. Audit QAA/20-18 conducted June 18-22, 1979, and Audit QAA/20-24/25 conducted August 24 - September 2, 1981, performed this function. These audits were conducted 26 months apart.

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

B. Technical Specification 6.5.4.2 requires that an inspection and audit of the fire protection and loss prevention program be performed by an outside qualified fire consultant at intervals no greater than three years.

Contrary to the above, this audit and inspection was not performed at intervals no greater than three years. An audit and inspection was conducted September 16-17, 1981. This requirement has been in effect since February 28, 1978 (Amendment 31). This audit was conducted 43 months after implementation.

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

- C. 10 CFR 50, Appendix B, Criterion V and the accepted QA Program (Letter dated March 18, 1981, Serial No. OQA-81-026) require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. The accepted QA Program endorses ANSI N45.2.12-1977 for performance of audits. Section 4.5.1 of this standard requires the audited organization to respond as requested by the audit report. CQAD 80-1, Procedure for Corporate QA Audits, Revision 2, paragraph 6.6.1, requires that the audited organization respond to audits within 30 days.

Contrary to the above, two audit responses were not submitted within 30 days. Audit QAA/20-23 was issued on February 5, 1981, and responded to March 16, 1981. Audit QAA/20-27 was issued on June 15, 1982, and responded to August 6, 1982.

This is a Severity Level IV Violation (Supplement 1)

- D. Technical Specification 6.5.3.4 requires that results of plant audits are approved by the Principal QA Specialist and transmitted to management within 30 days after completion of the audit.

Contrary to the above, audits QAA/20-27 and 20-28 were not transmitted to management within 30 days. Audit QAA/20-27 conducted April 26-30, 1982, was transmitted June 15, 1982, and Audit QAA/20-28 conducted May 11-14, 1982, was transmitted June 15, 1982.

This is a Severity Level V Violation (Supplement I). A similar item was brought to your attention with respect to the Brunswick facility in our enforcement correspondence dated July 19, 1982.

- E. 10 CFR 50, Appendix B Criterion V and the accepted QA Program (Letter dated March 18, 1981, Serial No. OQA-81-026) require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. CQAD 80-1, Procedure for Corporate QA Audits, Revision 2, defines a nonconformance as "A deficiency in characteristic, documentation, or procedure which renders the quality of an item unacceptable or indeterminate." This procedure also defines a concern as "A questionable practice which has the potential of causing a nonconformance or where additional information is required for evaluation of acceptability."

Contrary to the above, a finding (nonconformance) was incorrectly identified as a concern in Audit QAA/20-28 Concern 3. This concern identified that Emergency Instructions did not meet the requirements of ANSI N18.7-1976 Section 5.3.9.1.

This is a Severity Level V Violation (Supplement I). A similar item was brought to your attention with respect to the Brunswick facility in our enforcement correspondence dated January 9, 1981.

- F. 10 CFR 50, Appendix B Criterion XVII and the accepted QA Program (March 18, 1981 Letter, Serial No. OQA-81-026) require that sufficient records be maintained to furnish evidence of activities affecting quality. The accepted QA Program endorses ANSI N45.2.9-1974, Collection, Storage, and Maintenance of QA Records. Paragraph 5.4.2 of this standard requires that records be stored on shelving.

Contrary to the above, boxes containing radiographs were not being stored on shelving in the vault during an inspection of the vault on September 21-22, 1982.

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: ~~November 2, 1982~~