

APPENDIX A
NOTICE OF VIOLATION

Carolina Power & Light
Brunswick 1 & 2

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

As a result of the inspection conducted on June 15 - July 15, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

Technical Specification 6.8.1.a requires that written procedures recommended in Regulatory Guide 1.33, 1972, Appendix A be implemented and maintained. Appendix A of Regulatory Guide 1.33 recommends general plant operating procedures and system operating procedures. In addition Technical Specification 6.8.1.f requires fire protection program procedures to be implemented and maintained.

10 CFR 50, Appendix B, Criterion II requires that the licensee establish a quality assurance program which shall be documented by written procedures. The accepted quality assurance program (letter dated March 18, 1981, Serial OQA-81-026) states that Brunswick plant complies with the requirements for administrative controls described in ANSI N18.7-1976. ANSI N18.7-1976 requires in paragraph 5.3.2 that procedure content include references, prerequisites, precautions, and check-off lists.

Contrary to the above;

1. Operating procedure content does not conform to ANSI 18.7 requirements in that the procedures do not contain references and checkoff lists. In addition, some operating procedures do not contain applicable prerequisites and precautions.
2. General plant operating procedures and system operating procedures have not been maintained in that:

The procedures do not adequately complement each other by reference; and, the procedures contain numerous errors due to failure to revise the procedures to reflect current plant configurations.

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

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

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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: AUG 13 1982