

APPENDIX A

NOTICE OF VIOLATION

Carolina Power & Light Company
H. B. Robinson 2

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

As a result of the inspection conducted on July 11 - August 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 be established and implemented that meet or exceed the requirements of Appendix A of USNRC Regulatory Guide 1.33 Revision 2. Paragraph 1.d of Appendix A requires administrative procedures for procedure adherence. Corporate Quality Assurance Program Section 6 implements this requirement by requiring that superceded procedures be controlled to prevent their use. Robinson Administrative Instructions Section 5.0 and Operating Note 89 implement these requirements for operating procedures.

Contrary to the above, as of July 12, 1982, procedures had not been implemented to prevent use of superceded documents resulting in the use of superceded valve lineups for the Reactor Coolant System, Component Cooling Water System, and the Instrument and Station Air System.

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

- B. Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements and recommendations of Sections 5.2 and 5.3 of ANSI N18.7-1976. Section 5.2.15 of ANSI N18.7 requires that administrative controls and the quality assurance program shall provide measures to assure that procedures affecting safety-related systems are adequately reviewed prior to approval and release for use. These requirements are implemented by Sections 3.0 and 5.0 of the plant Administrative Instructions.

Contrary to the above, as of July 13, 1982, adequate review procedures had not been implemented for Maintenance Procedure MP1-10, used for safety-related instrument valve lineups. Procedure MP1-10 was inadequate in that it did not specify isolation valve configuration in a manner conducive to independent verification and included instruments which were controlled by operating procedures. Use of procedure MP1-10 resulted in the mispositioning of containment spray valve SI-892D.

This is a Severity Level IV 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: SEP 08 1982