

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson 2

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

As a result of the inspection conducted on December 11, 1982 - January 9, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification 3.1.2.1.d. requires that the overpressure protection system be operable whenever reactor coolant system (RCS) temperature is below 350°F and the RCS is not vented to containment.

Contrary to the above, as of December 12, 1982, the overpressure protection system has not met operability requirements since system installation in 1978 due to a nonconservative pressure transmitter calibration error affecting both trains of protection. As a result, the overpressure protection system was incapable of meeting its design basis requirements during all periods of required operability.

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

- B. Technical Specification 6.5.1.1.1. requires that procedures be established, implemented and maintained meeting the requirements of Appendix A of Regulatory Guide 1.33 Revision 2 and addressing surveillance and test activities of safety related equipment. Maintenance Instruction-4, Calibration Program, implements these requirements for calibration of the pressure transmitters required for proper operation of the low temperature overpressure protection system.

Contrary to the above, as of December 12, 1982, adequate procedures had not been established controlling the calibration of the low temperature overpressure protection system pressure transmitters in that the zero adjustment was incorrectly specified, resulting in transmitter output being non-conservatively low.

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

- C. Technical Specification 6.5.1.1.1. requires that procedures be implemented which meet the requirements of Appendix A to Regulatory Guide 1.33 Revision 2. Administrative Instructions Section 5 and Engineering Procedure 5.0 implement these requirements with respect to procedural compliance and plant modification control and require that modification implementing procedures be followed or appropriately revised and reviewed.

Contrary to the above, during periods of fuel movement on December 26-28, 1982, these procedures had not been implemented in that the following

requirements of Modification 633, Attachment 17, Fuel Shuffle Procedure, were not met:

- 1) The spent fuel pit water level was less than the minimum allowed.
- 2) The boron dip samples were not being performed.
- 3) The Fuel Handling Procedure 3.0, Table 3.4 log sheet was not utilized to record appropriate spent fuel pit parameters.

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: FFR 2 1983