

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Unit 1 and Unit 2

Docket Nos.: 50-325 and 50-324
License Nos.: DPR-71 and DPR-62

During an NRC inspection conducted on May 7 - June 3, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1 (a) requires that written procedures be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33 Appendix A, November 1972. Regulatory Guide 1.33, Appendix A, requires procedures for maintaining equipment control, procedure adherence, review and approval.

Plant Administrative Instruction AI-58, Equipment Clearance, Rev. 44, Section 5.3.1.14 requires that an operator remove tags and realign the components as required by the Clearance Tag Sheet. Section 5.3.1.18 requires that the clearance preparer/hanger review the Nuclear Revision Control System (NRCS) and verify that drawing(s) referenced in the clearance are correct and the current revision.

Operating Instruction OI-01, Operating Principles and Philosophy, Rev. 56, Section 4.3.1 requires a SRO/Shift Supervisor designate start and stop points if only a portion of a procedure is to be used.

Contrary to the above, the following are examples of failure to follow procedures:

- 1) On May 11, 1994, AI-58 was not adequately implemented in that, 2 clearances tags were found on the High Pressure Coolant Injection System after clearance 2-94-791 had been canceled.
- 2) On May 14, 1994, AI-58 was not adequately implemented in that, circuit breaker 2-2C-TBI-10 was found in the ON position vice the OFF position as required by clearance 2-94-100.
- 3) On May 25, 1994, Operating Instruction OI-01 was not adequately implemented in that control operators modified a procedure to perform only a selected section of the procedure without obtaining SRO/Shift Supervisor review and approval.

- 4) On May 23, 1994, AI-58 was not adequately implemented in that, the licensee failed to verify that the drawings used for clearance 1-94-1167 for the 1A Service Air Compressor were the correct revision. This resulted in the automatic start of the 1B and 1C Service Air Compressor.

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

- B. 10 CFR Part 50, Appendix B, Criterion VI, Document Control, requires that measures be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality.

Nuclear Plant Modification Program (NPMP) implements these requirements. NPMP, Revision 4, Section 6.2 requires that when a modification is declared operable, the closeout coordinator ensure appropriate notification is provided to the affected plant groups and design organizations to complete revision of plant and design documents affected by the modification.

Contrary to the above, on May 17, 1994, NPMP was not adequately implemented in that during a walkdown of Emergency Operating Procedure EOP-01-SEP-05, Primary Containment Purging, it was found that the EOP and drawings LL-90046-15, 16, 196, LL-90046-X14, X15, X16, X17, and F-97083 were not revised to reflect the changes made when plant modification 90-050 was implemented in January 1993.

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

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light Company is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this 24th day of June 1994