

APPENDIX A
NOTICE OF VIOLATION

Carolina Power & Light
H. B. Robinson 2

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

As a result of the inspection conducted on January 10 - February 10, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification 6.5.1.1.1 requires that written procedures be established and implemented that meet the requirements and recommendations in Appendix A of Regulatory Guide 1.33 Revision 2 for control of safety-related equipment. The following procedures were established to meet the requirements for control and correct positioning and locking of valves in the Containment Spray System: Administrative Instructions, Section 4.0, Standing Order-9, Operating Procedure-42, and Periodic Test 3.4.

Contrary to the above, as of January 24, 1983, procedures had not been implemented in that the Spray Additive Flow Educator Test Valve (SI-892D) was open vice closed and Containment Spray Pump A Educator Discharge (SI-892F) was unlocked.

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

- B. 10 CFR 50, Appendix B Criterion 16 requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. With respect to malfunctions affecting safety-related equipment, these requirements are implemented by the Corporate Quality Assurance Program Sections 5 and 15 and by Administrative Instructions Sections 2.0 and 4.0 and Maintenance Instruction-1. These instructions require prompt identification of and determination of appropriate corrective actions for malfunctions on safety-related equipment.

Contrary to the above, as of February 7, 1983, these instructions were not implemented in that the low air flow alarm condition existing on February 5-7, 1983, on containment air recirculation unit HVH-3 was not identified to plant management or maintenance supervision. This failure to initiate corrective actions resulted in HVH-3 being unable to automatically start under conditions of safety injection actuation coincident with station blackout during the above period.

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

- C. Technical Specification 6.5.1.1.1 requires that procedures be established and maintained which meet the requirements of Appendix A to Regulatory

Guide 1.33 Revision 2. Volume 16, Annunciator Procedures, implements these requirements with respect to procedures for alarm conditions.

Contrary to the above, as of February 7, 1983, Annunciator Procedures A2-5, A2-13, A2-21, and A2-29 had not been maintained in that they indicate that containment air recirculation units automatically trip on a loss of air flow. This feature was removed during modification activities in 1974.

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: FEB 23 1983