

APPENDIX A

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson, Unit 2

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

As a result of the inspection conducted on October 3-7, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

Technical Specification Table 4.1-3 item no. 14 states that once per operating cycle the charcoal and absolute filters for the Residual Heat Removal Compartments, HVE-5, shall be tested in-place to show ≥ 99 percent removal of polydispersed DOP particles by the HEPA filters and freon by the charcoal filters.

Technical Specifications 4.12 and 4.15 require the Control Room and Spent Fuel Building filter systems to be tested in-place at the stated frequencies. The in-place tests shall verify:

- 1) That the HEPA filters remove ≥ 99 percent of DOP when tested in-place in accordance with ANSI N101.1 (1972)
- 2) That the charcoal filters remove ≥ 99 percent of a halogenated hydrocarbon when tested in-place

ANSI N101.1 (1972) Section 3.3 requires that when a single sample point is used in determining filter efficiency, the sample point shall be representative of the DOP concentration across the sample plane. The single sample point for the unfiltered mixture may be considered representative of the sampling plane if the unfiltered mixture across the sampling plane is sufficiently uniform such that the maximum and minimum DOP concentrations do not differ by more than 10 percent of the maximum DOP concentration. The sampling plane for the filtered mixture shall be considered sufficiently uniform if the difference between the maximum and minimum DOP concentration is not more than 0.01 percent of the DOP concentration in the unfiltered air.

Contrary to the above, the tests demonstrating system operability performed prior to October 8, 1983, of the Spent Fuel Handling Building, Control Room, and Residual Heat Removal Compartment filter systems were inadequate in that:

- a. The single sample points used during the period of this inspection to determine filter efficiencies for the above systems were not representative in that DOP concentrations across the sample planes differed from the maximum DOP concentrations by 25 percent.

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- b. The requirement that filters in the Residual Heat Removal Compartment and Control Room filter systems be tested in-place to verify ≥ 99 percent removal of DOP and halogenated hydrocarbon gas was not met in that in-place filter tests performed during the period of this inspection failed to include filter bypass in the efficiency test.

This is a Severity Level IV 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 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 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: December 21, 1983