

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson

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

The following violations were identified during an inspection conducted on March 11 - April 10, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50 Appendix B Criterion XVI as implemented by the Licensee's Corporate Quality Assurance Program Section 15 requires that measures shall be established and implemented to assure that significant conditions adverse to quality are promptly corrected and corrective action is taken to preclude repetition.

Contrary to the above, as of April 5, 1984 procedural revisions required to prevent recurrence of violation 261/83-24-05 were not made. Your response, dated November 3, 1983, to violation 261/83-24-05 stated you would complete the corrective action by March 31, 1984.

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

2. 10 CFR 2.201 requires the licensee to submit to the NRC a written reply to a Notice of Violation. This reply shall include both corrective steps which will be taken to avoid further violations and the date when full compliance will be achieved.

Contrary to the above, your response to violation 261/83-33-01, dated January 27, 1984, stated that you had entered the events of this violation into the Operation Experience Feedback Program which ensures that other plant personnel become aware of the errors to prevent recurrence. You also stated full compliance had been achieved. In fact, the events of this violation were not entered into the Operational Experience Feedback Program until March 21, 1984.

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

3. Technical Specification 6.5.1.1.1.a. requires that written procedures be established which meet the requirements of Appendix A of USNRC Regulatory Guide 1.33, Revision 2, with respect to procedures for maintenance on safety-related valves. Maintenance Procedures CM-109, CM-120, and CM-104 were established, in part, to control maintenance on safety-related gate and swing check valves, including those associated with the reactor coolant pressure boundary pursuant to IE Bulletin 82-02.

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Contrary to the above, as of April 5, 1984, procedures had not been adequately established in that:

1. CM-109 did not address threaded fastener reassembly torque sequence, did not provide the adequate torque increment guidance, specified an improper lubricant, and did not address proper disc orientation for valve RHR-750.
2. CM-120 did not specify the approved lubricant.
3. CM-104 did not address proper disc orientation for valves CVC-350 and SI-862B.

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

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 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.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: APR 26 1984