

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 July 25-27, 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 V requires activities affecting quality to be accomplished in accordance with procedures. CP&L Corporate QA Manual, Section 4.3.1.3 requires purchase requisitions for plant quality related services be reviewed and approved in accordance with subsection 4.3.6 by the Corporate Quality Assurance Department prior to award; Section 5.2.2.1 of the CP&L Corporate Quality Assurance Manual requires Q-List items not be released until Receiving Inspection has been completed and items have been appropriately tagged to show status.

CP&L Procedure AP-XII-05, Rev. 0 "Warehousing", paragraph 4.6.3 requires all Q or safety-related material to be worked with an appropriate status tag ("Accept Tag or Conditional Release Tag") prior to release from the warehouse unit control. AP-XII-05 paragraph 4.4.2.c., and ANSI N45.2.2, Packaging, Shipping, Receiving, Storage and Handling of Items For Nuclear Power Plants (During The Construction Phase) paragraphs 2.7.3(2) and 6.1.2 require safety-related valves to be stored indoors.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that safety-related valves were removed from the warehouse without the procurement documentation being reviewed for technical and QA adequacy, prior to receiving inspection, without status markings which resulted in the valves being stored outdoors.

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

2. 10 CFR 50, Appendix B, Criterion IX requires measures be established to assure that special processes including nondestructive testing be accomplished in accordance with applicable codes. ASME B&P Code, Section V (80W80) Article 2 Table T-262.2 requires the use of a No. 40 Image Quality Indicator (IQI) for welds over 2.50" through 3" and a No. 45 IQI for welds over 3.00" through 4.00". ASME B&PV Code, Section V, paragraph T-235.2, specifies radiographs shall be considered unacceptable if the image of a Lead Letter "B" appears in the radiograph.

Contrary to the above, measures were not adequate to assure that non-destructive examination was accomplished in accordance with applicable code in that the following was noted:

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- a. A No. 50 IQI only was used for the accepted radiograph of "B" generator feedwater nozzle to remnant weld reported to be 3 to 5 inches thick.
- b. The image of a lead letter "B" appeared on two segments of the final accepted radiographs for the lower girth weld on "C" steam generator.

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

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: AUG 15 1984