

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Co.
Brunswick Site

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

During an NRC inspection conducted on May 2 - June 4, 1992, 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. 10 CFR 50.55a(g) and TS 4.0.5 require that an in service inspection program be implemented for ASME Code Class 1, 2 and 3 components and piping. ASME Section XI, Article IWA-1310 requires that the licensee maintain an inspection plan and provide the scheduling requirements. Article IWF-1100 requires supports which "support the weight of or provide the structural stability to components and piping" be included in the inservice inspection program.

Contrary to the above, the Brunswick second ten year inspection program (which started in 1986) did not include an inspection plan for pump bases, heat exchanger supports and pump turbines in Unit 2, and the reactor vessel skirt and lateral supports in Units 1 and 2.

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

- B. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented procedures and shall be accomplished in accordance with the procedures.

Operations Instruction OI-04, LCO Evaluation and Followup, Revision 41, Section 6.1.1.5.D requires that identified deficiencies of seismic supports receive a preliminary evaluation within 48 hours and a full engineering evaluation for structural integrity within 30 days.

Contrary to the above, an identified deficiency did not receive a full engineering evaluation for structural integrity within 30 days in that the evaluation for a deficiency concerning Unit 1 Core Spray instrument rack H21-P019 identified on April 5, 1992, was not completed on June 1, 1992.

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

- C. Technical Specification 6.8.1.a requires that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, including Administrative Procedures, Procedures for

Operation of Safety Related Systems, and procedures for Performing Maintenance.

Technical Specification 6.8.1.c requires that written procedures shall be established, implemented and maintained covering surveillance and test activities of safety related equipment.

Technical Specification 6.5.2.1 requires that a safety evaluation shall be prepared for changes to procedures required by Specification 6.8 and for proposed tests that effect nuclear safety.

Plant Operating Manual Volume I, Book I, paragraph 5.8.4 requires first and second party Technical and Nuclear Safety reviews for new procedures or for changes to existing procedures in the Operating Manual.

Contrary to the above, these requirements were not properly established and/or implemented as evidenced by the following examples:

1. On May 10, 1992, Technical Specification surveillance testing was performed in accordance with Work Request/Job Order 92-AJXX1, Drywell Cooling Unit 1A Supply fan, which had not received the required Technical and Safety Reviews prior to its implementation with Maintenance Surveillance Test 1-MST-DG11R, Diesel Generator 1 Loading Test.
2. On May 27, 1992, the Unit 1 Residual Heat Removal pump 1D failed to start in shutdown cooling because its suction valve had not been aligned open by the Operator. Operating Procedure OP-17, Revision 41, Residual Heat Removal System, did not include complete instructions for manipulating the system components once shutdown cooling had been established.

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

- D. Technical Specification 6.8.1.a requires that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, including Administrative Procedures, Procedures for Operation of Safety Related Systems, and procedures for Performing Maintenance.

Administrative Instruction AI-58, Equipment Clearance Procedure, Revision 36, implements the requirements for

developing, placing, and maintaining system and component clearances.

Operating Instruction OI-01, Operating Principles and Philosophy, Revision 43, Section 4.1 requires that plant evolutions be conducted in accordance with approved procedures.

Maintenance Management Manual OMMM-001, Maintenance, Conduct of Operations, Revision 17, Section 5.0 requires that maintenance be performed under the guidelines of plant procedures or specific written instructions.

Contrary to the above, these requirements were not properly established and/or implemented as evidenced by the following examples:

1. On May 12, 1992, the 1B2 battery charger was removed from service without disconnecting all loads from the battery as required by Operations Work Procedure OWP-51/1, Removal Of 125 VDC Battery System From Service Including DC Control Power Alignment, resulting in excessive battery discharge and polarity reversal of two cells.
2. On May 21, 1992, the Diesel Generator No. 4 barring gear lever was manipulated by plant personnel without authorization, resulting in lockout of the Diesel Generator.
3. On May 30, 1992, Local Clearance 2-92-1091, Hydraulic Control Unit (HCU) 38-11, was incorrectly placed on the corresponding valve for HCU 42-15 despite double verification performed for the proper component.

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 Brunswick facility, 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

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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 19 day of June 1992