## ENCLOSURE 1

## NOTICE OF VIOLATION

Carolina Power and Light H. B. Robinson

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

The following violations were identified during an inspection conducted on May 29 - June 1, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

 NRC Order dated March 14, 1983 requires, in part, that the licensee implement and maintain the post accident monitoring capability set forth in NUREG 0737, Item II.F.1. NUREG 0737, Item II.F.1, attachment 3, specifies that the licensee provide two containment high-range radiation monitors which meet the requirements of Table II.F.1-3. Table II.F.1-3 specifies that a onsite calibration by electronic signal substitution is to be performed for all range decades above 10 R/hr.

Contrary to the above, as of May 12, 1982, the two High-Range Primary Containment Radiation Monitors, RM-32 "A" and "B" had not been calibrated by electronic signal substitution through each decade up to 1 E+7 R/hr.

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

 10 CFR 20.103(a)(3) requires the licensee to use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas.

Contrary to the above, the requirement to use suitable measurements of concentrations of radioactive material in air was not met in that air samples performed on May 24, 1984 to evaluate airborne radioactivity levels in the "A" steam generator channel head were not taken near the breathing zone of the workers.

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

3. Technical Specification 6.5.1.1.1 requires that written procedures be established, implemented and maintained covering applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978. Appendix "A" Regulatory Guide 1.33 states that the licensee should have procedures for a radiation work permit (RWP) system.

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Health Physics Procedure HP-006, Radiation Work Permits (RWP) requires that individuals know and understand RWP's prior to entering the radiation control area. Procedure HP-006 also specifies that a health physics technician, when rendering continuous coverage for a job, is responsible for assuring RWP requirements are met.

Contrary to the above, Procedure HP-006 was not followed in that: a) on May 24, 1984, individuals entered "A" Steam Generator Channel Head without respiratory protection equipment required by RWP #2051, and b) the health physics technician rendering continuous coverage for this job did not assure that the RWP requirements were met.

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

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.

JUN 2 8 1984 Date: 2