

ENCLOSURE

NOTICE OF VIOLATION

Carolina Power and Light Company
H. B. Robinson 2

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

The following violations were identified during an inspection conducted on January 14 - 17, 1985 and January 21 - 24, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

- A. H. B. Robinson Technical Specifications, paragraph 3.3.1, require that piping associated with the safety injection pumps, residual heat removal pumps and residual heat exchangers be operable for reactor criticality. NRC IE Bulletin 79-02, Revision 1, Supplement 1, defines pipe supports with concrete expansion anchor safety factors less than two as inoperable.

Contrary to the above, prior to startup from the steam generator replacement outage, the licensee had erroneously used a concrete expansion anchor safety factor of one, considered the above noted systems operable, started up the reactor, and was critical at about 50 percent power. Upon notification of the Bulletin criteria, the licensee determined the above noted piping and eight associated pipe supports to be inoperable due to concrete expansion anchor safety factors that did not comply with the above noted IEB 79-02 operability definition. The reactor was subsequently shutdown by the licensee. Subsequent licensee evaluation resulted in 44 additional inoperable pipe supports or piping required by Technical Specifications to be operable for reactor criticality.

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

- B. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with instructions, procedures or drawings.
1. EBASCO Services Incorporated Procedure No. 79-14/C-3, Revision 3, Seismic Restraint Analysis and Design, paragraph 6.6 requires that "new loads" documented by the Mechanical Stress Analysis Department be used for restraint modification design.
 2. EBASCO Services Incorporated "Procedure for Inspection and Testing of Existing Concrete Expansion Anchor Bolts", Revision 4, Table 4 requires reduction of the capacity of 1½" diameter concrete expansion anchors that are less than 7½" from a concrete edge.

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Contrary to the above,

1. Maximum new loads were not used for the baseplate and concrete expansion anchor design for safety-related seismic restraint MS-1C-1062 modification.
2. A reduction of the capacity of 1½" diameter concrete expansion anchors, that were designed to be less than 7½" from a concrete edge, was not documented on the design calculation for safety-related seismic restraint SI-20-2310.

This is a Severity Level V violation (Supplment 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 of 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: FEB 13 1985