ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on March 1-31, 1988 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 (1988), the violations are listed below:

A. Technical Specification 3.4.6 provides pressure/temperature limits for the reactor coolant system that are applicable at all times. Under that specification, surveillance requirement 4.4.6.1.1 requires that the reactor vessel shell temperature and reactor vessel pressure be determined to be within the limits at least once per 30 minutes during system heatup, cooldown, and inservice leak and hydrostatic testing operations.

   Contrary to the above, on January 25, 1988, reactor vessel pressure and shell temperature were not determined to be within limits once per 30 minutes during system heatup. Specifically, from 2:45 a.m. to 4:30 a.m., a reactor coolant system heatup of about 90 degrees F occurred with no determination during that time that reactor vessel pressure and shell temperatures were within limits.

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

B. 10 CFR 50.59(a)(1) allows a licensee to make changes in the facility as described in the safety analysis report without prior Commission approval unless the proposed change involves an unreviewed safety question. 10 CFR 50.59(b) requires the licensee to maintain records of these changes. These records must include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question. Final Safety Analysis Report (FSAR) table 9.2.1-1, Service Water Flow Distribution - One Reactor Plant, lists Reactor Building CCW Heat Exchanger flow rate from the nuclear service water header during the first 10 minutes following a Loss of Coolant Accident, as zero gallons per minute.

   Contrary to the above, a written safety evaluation providing the basis for the determination that a change did not involve an unreviewed safety question was not performed. The licensee received information prior to Unit 1 startup on February 20, 1988, that with certain single failures, nuclear service water flow to the Reactor Building CCW heat exchangers would not be zero gallons per minute during the first 10 minutes of a Loss of Coolant Accident. This information constitutes a change in the facility as described in the FSAR. A written safety evaluation was not completed until March 22, 1988, subsequent to being identified by the NRC.

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

C. Technical Specification 4.6.6.2.a.2 requires that the Containment Atmospheric Dilution (CAD) system shall be demonstrated to be operable at least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path not locked, sealed or otherwise secured in position, is in its correct position. PT-16.1, Rev. 12, CAD System Component Test, implements this requirement.

Contrary to the above, the CAD system was not demonstrated to be operable by verifying each manual valve in the flow path not locked was in the correct position. Valve 1-CAC-V168, a flow path valve, was open and not locked on and before February 26, 1988, and was not verified in its correct position (open) by PT-16.1, Rev. 12.

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

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light Company is hereby required to submit to this office within thirty days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including (for each violation): (1) admission or denial of the violation, (2) the reasons for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

ORIGINAL SIGNED BY
DAVID M. VERRELLI

David M. Verrelli, Chief
Reactor Projects Branch 1
Division of Reactor Projects

Dated at Atlanta, Georgia
this 5th day of May 1987