

ENCLOSURE 1

NOTICE OF VIOLATION

Carolina Power and Light Company
Brunswick Site
Southport, North Carolina

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

During an NRC inspection conducted on December 1 - 31, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.8.1.a requires that written procedures be established, implemented and maintained covering the activities recommended in Appendix "A" of Regulator Guide 1.33, November 1972, including procedures for performing maintenance, clearances and logs.

- A. MMM-001, Maintenance: Conduct of Operations, Revision 18, requires that when a procedure cannot be performed as written, including unexpected results and unexpected equipment actions, the Mechanic/Technician shall stop work, place equipment in a safe condition, notify the Maintenance Supervisor and follow administrative instructions for obtaining correct procedure instructions.

Contrary to the above, procedures were not properly established in that on December 2, 1992, Work Request/Job Orders 92-BGRE1 and 92-BGRF1 for Residual Heat Removal Valves 1-E11-F006 B and D, respectively were prepared providing incorrect hand wheel torque values resulting in failure of the 1-E11-F006B valve actuator due to excessive torque on the handwheel. Procedures were not properly implemented in that on the same date, following failure of the 1-E11-F006B valve actuator, mechanics did not stop work, notify the Maintenance Supervisor nor obtain correct procedure instructions prior to applying excessive handwheel torque to the 1-E11-F006D valve actuator resulting in potential damage to the valve and actuator.

- B. Operating Instructions, OI-01, Operating Principles and Philosophy, Revision 048, Section 3.2.4.3 requires that a detailed explanation shall be provided in the shift supervisor's log for major events such as major plant evolutions.

Contrary to the above, on December 14, 1992, the starting and stopping of DG No. 2 for the performance of the DG No. 2 Monthly Load Test CPT 12.2B was not recorded in the shift supervisor's log, the only permanent plant record.

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- C. Administrative Instruction AI-58, Equipment Clearance Procedure, Revision 39, Section 3.9.1 requires that the clearance center staff is responsible to develop clearances that will ensure safe operating conditions existing while equipment is being cleared, maintained or returned to service.

Clearance 2-92-02902 was issued November 28, 1992, which placed the breaker for Recirculation System Valve 2-B32-F023B in the off/removed position.

Clearance 2-92-02887 was issued on November 24, 1992, which placed containment/atmospheric control system control circuit breakers 2-32AB-5 and 2-32AB-6 in the off position. This action was verified on November 25.

Contrary to the above, on December 22, 1992, control circuit breakers 2-32AB-5 and 2-32AB-6 were found to be in the on position and clearance 2-92-2887 had not been cancelled. Additionally, on December 8, 1992, the breaker for Recirculation System Valve 2-B32-F023B was in the on position and clearance 2-92-02902 had not been cancelled.

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 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 28th day of January 1993