

## NOTICE OF VIOLATION

Carolina Power and Light Company  
Brunswick Units 1 & 2

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

During an NRC inspection conducted from December 8, 1996 through January 18, 1997, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion XII, Control of Measuring and Test Equipment requires that measures shall be established to assure that gauges used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

Contrary to the above, on December 12, 1996, licensee measures failed to assure that the Unit 2 Residual Heat Removal (RHR) discharge pressure gauges 2-E11-PI-R003A(C) were properly calibrated during the performance of Periodic Test OPT-08.2.2c, Low Pressure Coolant Injection (LPCI)/RHR System Operability Test - Loop A.

This is a Severity Level IV Violation (Supplement I). This is applicable to Unit 2 only.

- B. 10 CFR 50.65(b) establishes the scoping criteria for selection of safety related and nonsafety related structures, systems, or components to be included within the Maintenance Rule program. Scoping criteria shall include those nonsafety related structures, systems, and components (SSCs) that are relied upon to mitigate accidents or transients, or are used in the plant emergency operating procedures.

Nuclear Generation Group Standard Procedure ADM-NGGC-0101 established the program for the implementation of the Maintenance Rule which identified those structures, systems, and components included within the scope of the Maintenance Rule.

Contrary to the above, as of January 14, 1997, the licensee failed to include a number of nonsafety related systems or components within the scope of the Maintenance Rule as required. The following examples were improperly excluded from the scope.

1. Communications, Emergency AC and DC Lighting - These nonsafety related SSCs were not included in the scope of the rule despite being used in Emergency Operating Procedures or being relied upon to mitigate accidents or transients.

2. Ambient Chlorine Detectors, Turbine Ventilation, Service Water Effluent, Reactor Building Area and Main Steam Line Radiation Monitors - These nonsafety related components were not included in the scope of the rule despite being used in the Emergency

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Operating Procedures or relied upon to mitigate accidents or transients.

This is a Severity Level IV Violation. (Supplement I). This is applicable to both units.

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, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a 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.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia  
This 14th day of February 1997