



50-261

USNRC FILE Carolina Power & Light Company
ATLANTA, GEORGIA

August 22, 1979

79 AUG 27 A 9:25

FILE: NG-3513(R)

SERIAL: GD-79-2115

Mr. James P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/79-14

Dear Mr. O'Reilly:

We have received and reviewed the subject report and are hereby responding to the infractions and deficiency as requested. This response is transmitted late due to the loss of the original in the mail between the plant and our corporate office. The delay was discussed with Mr. G. Troup of your staff.

Enforcement ItemInfraction

As required by Technical Specifications 6.11, in part, procedures for personnel radiation protection shall be adhered to for all operations involving personnel radiation exposure. Plant Procedure HP-7, "Special Radiation Work Permits," requires that the names of personnel involved shall be entered on the permit and that a work permit shall be required for entry into a locked, high radiation area.

Contrary to the above, on February 21 and February 22, 1979, individuals entered the reactor containment, which was a locked, high radiation area, without entering their names on a valid radiation work permit.

Corrective Action

As identified in Detail 5 of the inspection report 79-14, corrective action regarding this infraction was satisfactorily completed by CP&L during the inspection. The item was reviewed and closed for record purposes by the inspector, and no further action or written response is required.

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Enforcement ItemInfraction

As required by 10CFR20.103(c), when respiratory protective equipment is used to limit the inhalation of airborne radioactive material, such equipment shall be used as stipulated in Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection." Regulatory Guide 8.15 requires, in part, that the program include procedures to ensure adequate individual fitting of respirators and written procedures for control, issuance, and return of equipment. Amplification of these requirements is provided in NUREG-0041.

Contrary to the above, the licensee's respiratory protection program, as defined in Procedure HP-6, "Respirator Protection," does not provide adequate instructions for the fitting of respirators, issue, and control of respirators or documentation of respirator user qualification.

Corrective Action

The "Respirator Protection" Procedure HP-6, is currently undergoing a comprehensive review. This procedure will be completely revised to incorporate the inspector's findings and comments and to ensure complete compliance with the regulations on respiratory protection.

Corrective Action To Prevent Further Noncompliance

The previously stated corrective action will be followed to prevent further noncompliance.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by September 30, 1979.

Enforcement ItemDeficiency

As required by 10CFR19.11(a), certain documents shall be posted by the licensee. 10CFR19.11(b) permits the posting of a notice which describes the document and states where they may be examined in lieu of posting certain of the documents.

Contrary to the above, neither documents specified in 10CFR19.11(a) or the notice specified in 10CFR19.11(b) were posted so that workers could observe them on the way to or from the work area.

Corrective Action

Immediate investigation of the deficiency revealed the notices had been posted and had apparently been removed by persons unknown.

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The notices permitted by 10CFR19.11(b) were again posted at their appropriate locations shortly after it was discovered that they were missing. The inspector was notified of this investigation, and corrective action as is noted in Detail 9 of the inspection report.

Corrective Action To Prevent Further Noncompliance

The notices permitted by 10CFR19.11(b) will be mounted in more permanent fixtures at appropriate locations by August 31, 1979. These permanent fixtures should prevent the unauthorized removal of these notices in the future.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 29, 1979. Notices will be mounted in more permanent fixtures as described by August 31, 1979.

If further information is required, please contact me.

Yours very truly,



H. R. Banks

Manager

Nuclear Generation

MFP:CSB:jmb*