



Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550

November 7, 1979

Robinson File No: 2-0-4-a

SERIAL:RSEP/79-1228

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

H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/79-22

Dear Mr. O'Reilly:

We have reviewed the subject report and are hereby responding to the infraction as requested.

Enforcement Item

Infraction

As required by Technical Specification 6.8.1, written procedures shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33 dated November 3, 1972. ANSI N18.7-1972, Section 5.3.7, states in part that procedures shall be provided for the control, treatment, and management of radioactive wastes. R.G. 1.33 (1972), Appendix A, Section G, includes spent resin and filter sludge handling, baling machine operation, and drum handling and storage as typical safety-related activities which should be covered by written procedures.

Contrary to the above, there were no licensee-approved written procedures for the methods and techniques routinely used to transfer and dewater spent resin or to solidify evaporator bottoms.

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Corrective Action

Written procedures which reflect the methods and techniques routinely used to transfer and dewater spent resin or to solidify evaporator bottoms shall be developed and implemented by December 15, 1979.

Corrective Action To Prevent Further Non-Compliance

Further non-compliance will be prevented by the corrective action discussed above.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 15, 1979.

In addition to the response to the enforcement item, a response to the following concern expressed in the letter of transmittal for Inspection Report No. 50-261/79-22 with regards to the need for management-approved detailed instructions and operating procedures to be used by all personnel involved in the packaging of low-level radioactive materials for transportation and burial follows:

Concern

"In addition to the need for corrective action regarding the specific item of non-compliance, we are concerned about the discrepancy between your response to IE Bulletin 79-19 and the facts determined during this inspection regarding management-approved procedures. Consequently, your reply should address those actions taken or planned to improve the effectiveness of your management control systems in this regard."

Discussion

In preparing a reply to IE Bulletin 79-19, the need for reviewing and developing operating procedures to reflect current practices in the dewatering of spent resins and the drumming of evaporator bottoms was recognized. This need was communicated between the plant and CP&L Corporate Headquarters. However, the official response to subject bulletin, when transmitted to the NRC on September 21, 1979, failed to address the need for the aforementioned operating procedures at the H. B. Robinson Plant. This oversight was completely unintentional and was the direct result of miscommunications between the plant and Corporate Headquarters. Such

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miscommunications within our management control systems are infrequent; therefore, we do not believe a generic problem exists in this area.

Corrective Action

As a direct result of this difficulty the following action is being carried out:

- a. The response to IE Bulletin 79-19 will be revised to more accurately reflect the situation concerning management-approved procedures. This revision will be submitted by November 30, 1979.
- b. To preclude further recurrence, the details of this miscommunication have been reviewed in detail with the personnel involved in both the preparation and review of this response. They have been cautioned to ensure that future communications are as accurate as possible.

A recent reorganization of our management structure at the plant and Corporate Headquarters which was discussed with you and members of your staff on November 6, 1979, will help to further reduce the probability of a similar occurrence since the lines of communication required in many areas will be shortened somewhat, thereby ensuring the information is submitted from closer to the source. We are confident the action carried out as indicated above and the present reorganization will improve the effectiveness of our management control systems in this area.

If there are questions concerning this response, please contact me.

Very truly yours,



R. B. Starkey, Jr.
General Manager
H. B. Robinson S.E. Plant

MFP:pb

cc: V. Stello