



USNRC REGION II
ATLANTA, GEORGIA

Carolina Power & Light Company

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

MAR 20 1980

Robinson File No: 2-0-4-a-4

SERIAL:RSEP/80-364

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
UNIT NO. 2

DOCKET NO. 50-261

LICENSE NO. DPR-23

RESPONSE TO IE INSPECTION REPORT NO. 50-261/80-03

Dear Mr. O'Reilly:

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

A. Infraction

As required by Technical Specification 6.11, procedures shall be prepared, maintained and adhered to for all operations involving personnel radiation exposure. Health Physics Procedure 20, Item 3 in answer to Question 0, requires compliance with the Chem-Nuclear Systems, Inc. Radioactive Materials License prior to making a radioactive waste shipment to the Barnwell Waste Disposal Site. Condition 29 of CNSI License #097 (Amendment 26) states that waste containing both toxic chemicals and radioactive materials shall require an independent evaluation of both hazards.

Contrary to the above, on February 5, 1980 a metal container (4' x 4' x 6'), which had been prepared for shipment to the Barnwell Waste Disposal Site, was found to contain sulfuric acid in addition to Low Specific Activity material. No evaluation of the chemical hazard had been performed.

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261

Letter to Mr. James P. O'Reilly
Serial:RSEP/80-364
Page 2

Corrective Action

Following identification of the sulfuric acid in the metal container, both the acid and the battery in which it was contained were removed. The shipping container was then reinspected and resealed for shipment.

Corrective Action To Prevent Further Non-Compliance

In response to the item of non-compliance, health physics personnel received training concerning the proper actions to be taken for disposal of toxic and/or corrosive materials as radioactive waste. In addition, operations and maintenance personnel shall also receive training for proper disposal of these materials. Training of the personnel as noted should prevent further non-compliance. In addition, plant equipment and chemicals will be evaluated for toxicity and corrosiveness relative to waste shipments.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by May 31, 1980.

B. Deficiency

As required by 10 CFR 20.203(f), each container containing radioactive material in excess of 10 CFR 20 Appendix C quantities shall bear a durable, clearly visible label identifying the radioactive contents. The label must bear the radiation caution symbol, the words "Danger, Radioactive Material," or "Caution, Radioactive Material" and shall provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

Contrary to the above, on February 4 and 5, 1980, packages and equipment in the contaminated warehouse and several 55-gallon drums outside the Boron Injection Tank room were not labeled with sufficient information to permit individuals to adequately assess the radiological hazards present. In particular, kinds of material, estimates of activity, and date for which activity is estimated were missing from most containers. Dose rates obtained from licensee records indicate that the containers contained radioactive material in excess of 10 CFR 20 Appendix C quantities.

Corrective Action

All containers and packages containing radioactive material in excess of 10 CFR 20 Appendix C quantities identified during the inspection have been properly labeled in accordance with the requirements of 10 CFR 20.203(f).

Letter to Mr. James P. O'Reilly
Serial:RSEP/80-364
Page 3

Corrective Action To Prevent Further Non-Compliance

Revising applicable health physics procedures to more accurately define what constitutes proper labeling of radioactive materials pursuant to 10 CFR 20.203(f) Footnote 1 is currently in progress. Adherence to the revised procedures should prevent further non-compliance.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by September 30, 1980.

If additional information is required, please contact me.

Very truly yours,



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

DSC:pb

cc: V. Stello (1)