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Carolina Power & Light Company

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NOV. 15 1989

Robinson File No: 13510E

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United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
NRC INSPECTION REPORT NO. 50-261/89-22  
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Violation initiated by Inspection Report No. 50-261/89-22.

Severity Level IV Violation (RII-89-22-01)

10CFR20.201(b) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in 10 CFR Part 20, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Plant Technical Specification 6.5.1.1.1.a requires written procedures to be established, implemented, and maintained to cover the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1987. Appendix A of Regulatory Guide 1.33, recommends written procedures for contamination control.

Plant Procedure HPP-004, Radiological Controls of Tool and Equipment, Revision 4, dated May 9, 1989, Section 10.1.4 - Release of tools, equipment and sealed containers, Paragraph 2 gives the criteria for the release of material from the radiation control area (RCA) and the Protected Area. Paragraph 2 states that the item must not display any detectable activity, i.e., no smearable beta contamination and less than 100 background corrected counts per minute (ccpm) total beta contamination.

Plant Procedure HPP-004, Radiological Controls of Tools and Equipment, Revision 4, dated May 9, 1989, Section 10.1.4.2, states a release criterion that items must not display any detectable activity, i.e., no smearable beta contamination and less than 100 ccpm total beta contamination for unconditional release.

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Contrary to the above, surveys were inadequate, in that on July 31, 1989, the licensee released from the RCA, and subsequently released offsite, contaminated welding equipment with contamination levels up to 8,500 disintegrations per minute per 100 square centimeters (dpm/100 cm<sup>2</sup>), which is approximately equivalent to 850 ccpm/100 cm<sup>2</sup>. Furthermore, on at least six occasions between October 1987, and April 1989, the licensee released materials and equipment outside the RCA but not outside the Protected Area, with contamination levels greater than 100 ccpm.

REPLY

(1) Admission or Denial of the Violation

CP&L acknowledges the violation. It should be noted, however, that the surveys resulting in the violation occurred on July 13 and 14, 1989.

(2) The Reason for the Violation

A Special Task Force comprised of Radiation Control and Regulatory Compliance personnel was formed to determine the root cause of this event, and to review past performance from 1987, 1988, and 1989 to identify any programmatic changes necessary to prevent recurrence. The task force conducted a Human Performance Evaluation System (HPES) Evaluation to determine the root cause for the July 13 and 14 failure to perform an adequate survey of equipment prior to release. The results of the evaluation identified several causes that could have led to the event. These causes include weaknesses in work practices and deficiencies in work planning and supervisory methods.

The Special Task Force investigated events over the three year period and additionally found that, because of their infrequent nature, trending methods of events from year-to-year were inadequate.

(3) The Corrective Steps Which Have Been Taken and the Results Achieved

The following immediate corrective actions were imposed upon discovery of the July 13 and 14 occurrence:

- A. Outgoing material requires a survey with an independent verification prior to release from the RCA or Protected Area.
- B. Persons who receive material from another nuclear facility are instructed to notify Radiation Control to survey the material prior to entry into the Protected Area.
- C. Surveillance by Radiation Control personnel (RC) has been increased in the following areas:
  - (1) Protected Area - Random surveys of non-permanent items on a weekly basis.

- (2) Materials Control Areas - Daily surveys of the Unit No. 1 and Unit No. 2 Materials Receiving areas.
- (3) Maintenance/I&C Shop - Daily surveys of the Shop areas.
- (4) RCA/Protected Area - Containers/boxes are opened for a survey of their contents prior to leaving the area.

D. The Special Task Force addressed above was formed to investigate and determine the root cause of this event and to evaluate performance over the past three years to determine if changes in the Radiation Protection Program would be necessary. The root cause analysis has been completed, and actions to preclude recurrence are being implemented. As a result of these actions, Radiation Control Management is giving greater focus on the day-to-day tasks to ensure attention to the detail in each individual task.

(4) The Corrective Steps Which Will be Taken to Avoid Further Violations

The HPES causal analysis of this event identified three primary categories of inappropriate actions that led to this and other events. These categories, and proposed corrective actions, are as follows:

(A) Work Practices

- Revise procedures to improve documentation provisions, release forms, tagging system, and container control, and to provide a better description of material released.
- Designate two separate and distinct release points (the RCA and the Protected Area (PA)), and perform separate and distinct documented surveys for items leaving the Protected Area. Modify the "green tag" system to enhance control in the RCA.
- Minimize the use of certain high risk items such as tape, cable, hoses, wood, etc.
- To the extent practical, survey "clean" equipment used at other nuclear facilities prior to use onsite.
- Incorporate frisking instructions in General Employee Training and the Craft Technical Development.

(B) Work Organization/Planning

- Reinforce to plant personnel that frisking is a time consuming task, and to schedule releases of material from the RCA/PA to allow adequate time for frisking.

- Observe and evaluate frisking techniques to ensure continued adequacy.

(C) Management Methods

- Counsel and reinforce the importance of good technique and procedural compliance to RC personnel who release material from the RCA/PA.
- The Monthly Performance Monitoring used to assess trends for these events will be expanded to review a three-year period vs. a one-year period beginning January 1990. This should enhance the identification of adverse trends.

(5) The Date When Full Compliance Will Be Achieved

Although full compliance has been achieved with the immediate (interim) actions above, the longer term actions will be fully implemented prior to the start of the next refueling outage.

The inspection report requested that, in addition to the need for corrective action regarding the specific matters identified in the Notice of Violation, our response described those particular actions taken and planned to improve the effectiveness of our Radiation Protection Program. Based on the root cause analysis performed, we believe that the corrective actions developed above will prevent other incidents from occurring, therefore, constituting the needed improvements to the Radiation Protection Program.

Very truly yours,

*Charles R. Dietz for CRD*  
Charles R. Dietz  
Manager

Robinson Nuclear Project Department

RDC:lht

cc: S. D. Ebner  
L. W. Garner  
INPO