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SUBJECT: Responds to violations noted in Insp Rept 50-261/92-31.
Corrective actions:health physics technician performing
inadequate survey counseled & lesson plans for health
physics technicians will be revised.

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United States Nuclear Regulatory Commission
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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. 50-261/92-31 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in NRC Inspection Report 50-261/92-31.

Enclosure 1 provides a description of the occurrence, the causal factors and root causes identified for the violation, and a discussion of the specific corrective actions taken and planned for the occurrence.

Should you have any questions regarding this matter, please contact
J. L. Harrison at (803) 383-1433.

Very truly yours,

Charles R. Dietz
Vice President
Robinson Nuclear Plant

RDC:lst

Enclosure

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO

NO-100
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Handwritten initials/signature in the bottom right corner.

REPLY TO A NOTICE OF VIOLATION

RII-92-31-01:

Technical Specification 6.5.1.1.1.a requires that procedures be established for activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978. Appendix A Item 7.e.4 requires procedures for contamination control. HPP-001, Radiation Control Area Surveillance Program, Revision 36, was established to provide instructions for contamination control. Step 10.1.8.7 of HPP-001 required that each Contaminated Process Equipment Area (CPEA) be conspicuously posted.

Contrary to the above, on November 12, 1992, HPP-001, step 10.1.8.7 of HPP-001 was not implemented in that the Charging Pump Room was not posted as a CPEA, despite equipment contamination levels in the Charging Pump Room meeting the CPEA definition of HPP-001.

REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described.

On November 11, 1992, the Contaminated Process Equipment Area (CPEA) posting for the Charging Pump Room entrance door was moved, and a posting for a High Contamination Area was installed to support maintenance activities on the "C" Charging Pump. Upon completion of the work, the Radiation Control Supervisor directed that the area around the "C" Charging Pump be surveyed and the posting for the room changed as the survey data would allow. A Health Physics Technician performed a survey of the work area, and subsequently removed the posting on the Charging Pump Room door such that it was no longer considered a High Contamination Area, as was reflected by his survey.

On November 12, an NRC Inspector questioned the Charging Pump Room posting, since the area had been normally posted as a CPEA. Upon notification of the possible discrepancy, Health Physics supervision directed that a follow-up survey be performed. The results of this survey identified that the initial survey was inadequate. Although the survey results did not meet the levels required for a High Contamination Area, contamination levels in the room indicated that the room was required to be posted as a CPEA.

The investigation of the circumstances surrounding the inadequately performed survey identified that a primary causal factor is the "Contaminated Process Equipment Area" designation. Such areas are not required to be identified by regulation, and are therefore not standard within the industry. H. B. Robinson uses such designations as additional means of controlling contamination within the Radiation Control Area. Because the Radiation Control Technician who performed the survey of the Charging Pump Room was a contractor, his familiarity with such designations was in question. As such, based on the number of the individual's previous surveys in other areas not designated as a CPEA, habit intrusion allowed an insufficient degree of attention to be applied to the survey of the room, resulting in his failure to recognize the potential for the room to require a CPEA posting.

2. The Corrective Steps That Have Been Taken and the Results Achieved

Upon discovery that the Charging Pump Room met the requirements of HPP-001 to be posted as a CPEA, the posting at the room entrance was upgraded. The Health Physics Technician who performed the inadequate survey was counseled, and disciplinary actions were administered. The event was discussed in detail with other Radiation Control Technicians, and supervisory expectations for performance of adequate surveys were reiterated to them.

In order to determine if other deficiencies currently exist in the Contamination Control Program, Radiation Control Supervisors reviewed surveys and posting processes for other contaminated areas, and found no discrepancies. Additional monitoring is being taken to determine if these expectations continue to be met. This is accomplished by use of a process which requires an independent verification when postings have been changed. CP&L views this as a feedback process only, and does not consider this action as a long term commitment.

3. The Corrective Steps That Will Be Taken to Avoid Further Violations

CP&L believes that this was an isolated event which was compounded by the earlier work in the Charging Pump Room requiring the CPEA posting at the entrance to be moved. Review of the individual's work history at CP&L, training, qualifications, and overall Health Physics work experience, indicate that no programmatic concern or adverse trend exists for contamination control procedures.

In order to prevent recurrence of this concern, the Lesson Plans for Contract Health Physics Technicians will be revised to emphasize that, although CPEA designation is not standard to the industry, it is used at H. B. Robinson as part of the Contamination Control Program.

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4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the revision to the Lesson Plans mentioned above, which will be completed by February 28, 1993.