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 MORGAN, R.E. Carolina Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Region 2, Ofc of the Director

SUBJECT: Responds to recent telcon between JM Curley & J Porter re  
 control of access to LHRA, per 840728 event.

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U. S. Nuclear Regulatory Commission  
Region II  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
CONTROL OF ACCESS TO LOCKED HIGH RADIATION AREAS

Gentlemen:

In follow-up to a recent telephone conversation between Mr. J. M. Curley, Manager-Environmental and Radiation Control at the H. B. Robinson Plant, and Mr. John Potter of your staff, certain changes to H. B. Robinson's Locked High Radiation Area (LHRA) Key Control program are being proposed. These controls were initiated following an event which occurred on July 28, 1984, as described in NRC Inspection Report 84-05.

As a result of overall improvements in the Robinson Radiation Control Program since this event, we are confident that changes in the LHRA key control process can be made while not compromising control of locked high radiation areas. As an example, currently, the ANSI qualified Radiation Control Technician on shift maintains possession of a LHRA key. This key is passed on to the relieving shift technician. Based on current procedures, which were developed as a result of an NRC commitment (reference 3), this turnover requires notification to the on-call Radiation Control Foreman who is typically off-site during turnover. With the improvements in the Radiation Control Program including the reduction of the number of LHRA's, we believe this notification is no longer necessary, and responsibility for proper turnover of control of that key should rest with the ANSI Technician. As discussed with Mr. Potter, Plant procedures are currently being revised to incorporate this change.

In addition, as the Radiation Control Program at H. B. Robinson continues to be improved, other changes are anticipated that may modify previous commitments. We believe that future changes of this nature can be made without additional correspondence with the Region II office. In all cases, these changes will in no way compromise overall radiological controls and will conform to applicable regulations and Technical Specification requirements.

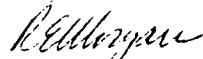
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Letter to U.S. Regulatory Commission  
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Should you have any questions concerning this matter, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



R. E. Morgan  
General Manager  
H. B. Robinson S. E. Plant

References:

1. E. E. Utley to Mr. R. C. DeYoung, NLS-84-196, May 23, 1984, "IE Inspection Report 84-05"
2. G. P. Beatty to Mr. J. P. O'Reilly, RSEP/84-509, August 3, 1984, "Control of Access to Locked High Radiation Areas"
3. R. E. Morgan to Mr. J. P. O'Reilly, RNP/85-29, January 8, 1985, "HBR Locked High Radiation Area Key Control"

cc: Mr. L. W. Garner  
Mr. R. Lo  
NRC Document Control Desk