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SUBJECT: Responds to violations noted in Insp Rept 50-261/87-24.
 Corrective actions: special training session held on 870717
 to review 870716 incidents w/individuals involved. Incidents
 will be discussed at routine monthly info meetings.

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
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INSPECTION REPORT 87-24

Dear Sir:

Carolina Power & Light Company (CP&L) provides this response to the alleged violation discussed in USNRC Inspection Report 87-24.

Alleged Severity Level IV Violation (RII-87-24-01-SL4)

Technical Specification 6.5.1.1.1.a requires that procedures be established, implemented, and maintained covering the applicable activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Revision 2, February 1978, requires procedures for radiation protection including contamination control and a Radiation Work Permit system.

Contrary to the above, on July 16, 1987, radiation protection procedures were not adhered to in that:

1. A worker entered a contamination area that had been established around a spent fuel cask transfer skid without wearing the protective clothing specified for entry into this area, as required by Section 5.2.2 of Plant Program Procedure PLP-016, and
2. Four individuals were noted exiting contamination areas without performing a hands and feet frisk at the nearest frisking station immediately upon exiting a contamination area, as required by Section 3.1.3 of Plant Program Procedure PLP-031.

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Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the violation.

2. Reason for the Violation if Admitted

With regard to the first part of the violation:

The worker in question failed to follow the instructions of PLP-016, Revision 4, Radiation Work Permit Program, Section 5.2.2, which requires personnel to read, understand, and follow the provisions set forth on their Radiation Work Permit (RWP). RWP 87-0188, Revision 1, covering work associated with movement of spent fuel to the dry storage facility instructed workers to wear the protective clothing called for by the area radiological posting. The posting for the area around the spent fuel cask transfer skid instructed workers to wear shoe covers and gloves for entry. Contrary to the posting, the worker chose to don only rubber gloves and to reach across the rope barrier to pull a tarpaulin over the skid. This action, although protecting the worker from contamination, was not in accordance with the RWP or PLP-016 and impacted compliance with Technical Specification 6.5.1.1.1.a.

With regard to the second part of the violation:

The individuals in question failed to follow the instructions of PLP-031, Revision 2, Personnel Contamination Program, Section 3.1.3 which requires personnel to perform a hands and feet frisk at the nearest frisking station immediately upon exiting a contamination area. These four individuals elected to disregard the frisking stations nearest the contamination area and to use instead the portal monitors at the entrance to the Radiation Control Area. Although no contamination was transported by these four individuals, their actions were not in accordance with PLP-031 and impacted compliance with Technical Specification 6.5.1.1.1.a. In addition, the major contributing causes have been determined to be personnel training deficiencies resulting in failure to follow procedure and a lack of individual self-discipline with regard to ensuring all requirements are understood for work under RWP 87-0188.

3. Corrective Steps Which Have Been Taken and Results Achieved

A special training session was held on July 17, 1987, to review the July 16 incidents with the individuals involved. The training readdressed the requirements of PLP-016 and PLP-031, as well as those of RWP 87-0188. In addition, the commitment to full compliance with procedures as discussed in Health Physics Procedure HPP-001, Revision 19, Radiation Control Area Surveillance Program, was reviewed with the individuals. Each of the individuals acknowledged an understanding of the procedure requirements and those of the RWP, as well as the potential impact to compliance with Technical Specifications.

3. (Continued)

Although the subject frisking requirement was included in the initial General Employee Training (GET) Level 2 lesson plan, it was not a part of the GET Level 2 annual retraining program. This requirement has been incorporated into the GET Level 2 annual retraining program, effective August 31, 1987.

4. Corrective Steps Which Will Be Taken to Prevent Repetition of the Violation

The training provided the four individuals identified by this violation was also given to other personnel who normally work under RWP 87-0188 to assure an understanding of the procedures for radiological protection and contamination control. This training should prevent repetition of the violation.

The incidents will be discussed at the routine monthly information meetings of Robinson Nuclear Project Department at the end of September to remind all in attendance of the importance of procedural compliance in radiological protection and contamination control. These discussions will involve the vast majority of personnel onsite and should prevent the occurrence of any similar violation.

5. Date When Full Compliance Will Be Achieved

The information meetings are scheduled for September 22, 23, and 24, 1987. Full compliance will be achieved September 24, 1987.

If you have any questions concerning this submittal, please contact Mr. R. M. Smith.

Very truly yours,



R. E. Morgan
General Manager

H. B. Robinson S. E. Plant

DAS:sdm

cc: J. N. Grace
H. E. P. Krug