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SUBJECT: Responds to alleged violations noted in Insp Rept 50-261/88-02. Corrective actions: whole body counts performed on licensee & offsite machine shop personnel involved in handling matl relative to event. Results nondetectable.

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CP&L
Carolina Power & Light Company

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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
INSPECTION REPORT 88-02

Dear Sir:

Carolina Power & Light Company (CP&L) provides this response to the alleged Violation discussed in USNRC Inspection Report 88-02.

Alleged Severity Level IV Violation (RII-88-02-01-SL4)

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 10CFR 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 1978. Appendix A of Regulatory Guide 1.33 recommends written procedures for contamination control.

Plant Procedure HPP-004, Radiological Control of Tools and Equipment, Revision 12, dated November 5, 1987, Section 10.1.4.2, states as release criterion that items must not display any detectable activity, i.e., no smearable beta contamination and less than 100 corrected counts per minute (ccpm) total beta contamination for unconditional release.

Contrary to the above, on September 14, 1987, the licensee released from the Radiation Control Area and, subsequently released offsite, an internally contaminated Dry Storage Canister-Mockup with contamination levels up to 190,000 disintegrations per minute per 100 square centimeters (dpm/100 cm2), which is approximately equivalent to 19,000 ccpm/100 cm2.

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Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the Violation.

2. Reason for the Violation

The release of the Dry Storage Canister-Mockup (DSCM) from the Radiation Control Area (RCA) and subsequent release to an offsite machine shop is attributed to the failure of a radiation control technician to perform an adequate survey for total and smearable contamination as required by Procedure HPP-004, Radiological Control of Tools and Equipment, Revision 11, dated August 19, 1987, Section 10.1.4 (essentially unchanged by Revision 12, dated November 5, 1987).

3. Corrective Steps Which Have Been Taken and Results Achieved

All material releases from the Radiation Control Area (RCA) and Protected Area (PA) were immediately suspended. Radiation Control supervision initiated extensive surveys outside and inside the Protected Area and evaluated the results. Surveys of 27 distinctive areas inside and outside the PA revealed that no other areas were contaminated.

Whole body counts were performed on licensee and offsite machine shop personnel involved in handling material relative to the event. Results were non-detectable.

An investigation team sent to the offsite machine shop determined that the contamination present at the shop was confined to the metal chips on and around the lathe used in machining the dry storage cannister-mockup. There was no contamination spread from this area into other areas of the shop. All contaminated material was returned to the H. B. Robinson RCA.

Automobiles of the involved fabrication shop personnel were surveyed with no contamination found.

Historical data was reviewed to determine if a trend could be established for incidents of this nature. This review found one other incident, February of 1986, where an electrical cable with fixed contamination had been inadvertantly released to the Plant storage area outside the Protected Area. There were no contaminated items inadvertently released during 1987. Therefore, this indicates that the stated event was an isolated incident and not a programmatic deficiency.

The radiation control technician who performed the inadequate survey prior to release of the contaminated DSCM has been disciplined. In addition, this individual developed and conducted a training program for radiation control technicians covering release survey procedures and the importance of procedural compliance.

Additionally, the importance of procedural compliance has been re-emphasized to Radiation Control personnel by E&RC management.

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

Review of historical data indicates that this incident was an isolated case. Therefore, the corrective actions taken above are considered sufficient to avoid further violations.

5. Date When Full Compliance Will Be Achieved

The failure to follow procedure was corrected immediately upon identification of the incident. Upon completion of all surveys on October 7, 1987, whole body counts of involved individuals on October 8, 1987, and return of contaminated material to the H. B. Robinson RCA on October 6, 1987, confidence was established that no uncontrolled contaminated material existed outside the Protected Area. Full compliance therefore was achieved on October 8, 1987. CP&L is currently in compliance with procedure HPP-004 and Plant Technical Specification 6.5.1.1.1.a and 10CFR20.201(b).

If you have any questions concerning this submittal, please contact Mr. J. M. Curley.

Very truly yours,

Guy P. Beatty, Jr.
Vice President
H. B. Robinson S. E. Plant

AHS:jch

cc: Mr. L. W. Garner
Dr. J. N. Grace