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 FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Ligh 05000261
 AUTH.NAME AUTHOR AFFILIATION
 CUTTER,A.B. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Notifies that plans & schedules submittal on 830415 & 0824
 for implementing emergency response capabilities at
 facility, in response to Generic Ltr 83-33, will remain
 consistent w/840221 order.

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Carolina Power & Light Company

JUN 15 1984

SERIAL: NLS-84-253

Director of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
EMERGENCY RESPONSE CAPABILITIES

Dear Mr. Varga:

By letters dated April 15, 1983 and August 24, 1983, Carolina Power & Light Company (CP&L) summarized plans and schedules for implementing emergency response capabilities at H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2) in response to NRC's Generic Letter 82-33. On February 21, 1984, you issued an order confirming CP&L's commitments. It is CP&L's understanding based on discussions with your staff that the commitments listed in the order supercede CP&L's previous commitments. Specifically, CP&L originally discussed interim milestones for certain projects. Only the end dates are stated in the order. CP&L intends to meet the commitments in the order; however, the schedules for some of the interim milestones may not be met due to the current steam generator replacement outage. The overall completion dates will remain consistent with the order.

Unless we hear from you otherwise by July 16, 1984, we will assume that this position is acceptable to you. If you have any questions on this subject, please contact Mr. Sherwood Zimmerman at (919) 836-6242.

Yours very truly,

A. B. Cutter - Vice President
Nuclear Engineering & Licensing

ONH/pgp (2100NH)

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)

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S.A. Vargo

CP&L

Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

SERIAL: NLS-84-278

JUN 15 1984

E. E. UTLEY
Executive Vice President
Power Supply and Engineering & Construction

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261 - LICENSE NO. DPR-23
IE INSPECTION REPORT 84-05

Dear Mr. DeYoung:

The NRC Region II letter of March 13, 1984 transmitted a Notice of Violation and Proposed Imposition of Civil Penalty (EA-84-14). Carolina Power & Light Company (CP&L) responded to the Notice of Violation in its letter, Serial NLS-84-196, of May 23 to you. Additional information is available which may be of use to you in evaluating our response. This letter supplements our May 23 letter and provides further statement of facts concerning corrective steps which were taken subsequent to the incident.

On page 7 of our May 23 letter, corrective steps were enumerated. Included among those steps were training sessions which "were conducted with Operations, HP, and management personnel discussing the specifics of the event and the necessity to ensure that all procedures are used and followed." This brief description may not have characterized fully the breadth of this training.

These training sessions were initiated immediately after the February 19, 1984 incident. Plant management developed a training instruction on February 22, 1984 and directed all site managers and supervisors to:

- a. Review the training instruction content with all plant and contractor personnel under their supervision who have unescorted access to radiation areas.
- b. Upon their return to site, review the training instruction content with personnel not currently on site.
- c. Provide records of the reviews.

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PDR 5pp.

On February 22, 1984, Mr. G. P. Beatty, Manager of the Robinson Nuclear Project, distributed the training instructions and conducted meetings with the site managers and supervisors who supervised persons having unescorted access to radiation areas. Attachment 1 is a list of all persons who attended these meetings. The purpose of these meetings was for the Project Site Manager to review the incident, stress the importance and significance of the incident, and to reiterate management's support and insistence upon strict adherence to procedures including those which govern work in radiation areas and radioactively contaminated areas.

The reviews requested of the site managers and supervisors were completed in accordance with the request of plant management. The reviews started promptly on February 22 and by February 29, 1984 a total of 1,177 personnel of CP&L and its contractors received this supplement to their training. Specific documentation of the completion of this training identifying individuals trained is on file at the H. B. Robinson Plant.

The training instruction in which personnel were trained included detailed description of the incident and a review of the requirements of procedures which control entry into high radiation and locked high radiation areas. It further extended the specific facts concerning this incident to identify other potential high radiation or locked high radiation areas of the plant. Attention was directed toward the need for strict adherence to all plant procedures including those related to work in radiation areas.

In addition to the training sessions, other actions were taken which were not fully described in our May 23 letter. They included:

- a. An investigation of the incident was performed by three individuals who are organizationally independent of the H. B. Robinson Project Department. The results of this investigation were utilized in formulation of other corrective steps described in our May 23 letter.
- b. The General Employee Training (GET) was revised in response to the investigations performed into this incident. More explicit treatment was given to the requirements for radiological protection in high and locked high radiation areas.
- c. Additional interviews by CP&L Radiological Control personnel are given to contract Senior Health Physics Technicians to verify their capabilities prior to their surveilling work.

Carolina Power & Light Company stressed in its May 23 letter that it had taken numerous actions to promptly investigate, evaluate, and correct the conditions which contributed to the February 19 incident. This supplementary information further supports the facts in this matter. We, therefore, reiterate the request in our May 23 letter that the Civil Penalty imposed by the NRC for the February 19 incident be withdrawn or fully mitigated.

If you have any questions regarding this, please contact my staff or me.

Yours very truly,

MA M. Duffie
for E. E. Utley

EEU/mf (273SRZ)

Attachment

cc: Mr. J. P. O'Reilly (NRC-RII)
Mr. G. Requa (NRC)
Mr. Steve Weise (NRC-HBR)
Mr. S. A. Varga (NRC) ✓

ATTACHMENT 1

The following individuals attended the meeting with Guy P. Beatty, Jr. on February 22, 1984 concerning the radiation exposure incident of February 19, 1984 at the H. B. Robinson Plant:

<u>Name</u>	<u>Company/Section</u>
Frank Gilman	CP&L/Reg. Compliance
Blaine Rieck	CP&L/Control & Admin.
Betty Watkins	CP&L/Control & Admin.
George McCoy	CP&L/Control & Admin.
Fred Lowery	CP&L/Operations #2
David Snipes	CP&L/Operations #1
Ed Paine	CP&L/Engineering - Perf.
Marvin Page	CP&L/Engineering - Perf.
Stan Crocker	CP&L/E&RC
Bill MacCready	CP&L/E&RC
Bruce Meyer	CP&L/E&RC
David Boan	CP&L/E&RC
Ned Little	CP&L/Maintenance #2
Ronnie Elmore	CP&L/Maintenance #2
Levern Johnson	CP&L/Maintenance #2
Major Scott	CP&L/Maintenance #2
Everett Lear	CP&L/Maintenance #2
Mike Byrd	CP&L/Traveling Maint.
Mick Mishoe	CP&L/Traveling Maint.
Ira Edwards	CP&L/Maintenance #2
French Bishop	CP&L/Onsite Nuclear Safety
Bill Blaisdell	CP&L/Training
Dave Baur	CP&L/QA
Al Beckman	CP&L/Construction
Randy Phillips	CP&L/Construction
Mike Heath	CP&L/Construction
Sonny Kirkland	CP&L/Construction
Ralph Hollis	CP&L/Construction
Willard Brown	CP&L/Fire Protection
Grant Chappell	CP&L/Engineering - Plant
Braxton Starnes	CP&L/Construction
Don Powers	CP&L/Raleigh
Douglas Dill	CP&L/Raleigh
Ray Clark	CP&L/Maintenance #2
Tony Grant	CP&L/Maint. Support - Southern
Wayne Gainey	CP&L/Maint. Support - Southern
Byron Harward	CP&L/Engineering

ATTACHMENT 1 (Cont'd)

<u>Name</u>	<u>Company/Section</u>
Gary Haynes	IRM
George Parness, Jr.	Burns Security
Cleatus Pettus	Burns Security
Lannie Hiller	Willis Construction
Otis Anglin	PCI
Lou Palmer	Logan Construction
Neil Bedenbaugh	Dempsey Construction
Neil Venart	Metric Construction
Jim Butler	Metric Construction
Ray Conn	Metric Construction
Ray Dunagan	Ballenger Construction
Jerry Johnson	Griffin Dewatering
Jerry Stewart	Metric Construction
Erskine Hill	Metric Construction
Ken Lacks	Metric Construction
Kevin Flinnery	Metric Construction
Mark Centennial	Metric Construction
John Schumacher	Metric Construction
Robert Kerwin	Metric Construction
Ed Russell	Metric Construction
Floyd Flatton	Metric Construction
Robert Hardison	Metric Construction
John Richburg	Metric Construction
Mike Flannery	Metric Construction