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Carolina Power & Light Company Raleigh, N.C. 27602 Mr. E. E. Utley	9-5-73	9-10-73	X			

TO:	ORIG	CC	OTHER	SENT AEC PDR XXX SENT LOCAL PDR XXX
RJ Schemel	3 signed			

CLASS	UNCLASS	PROP INFO	INPUT	NO CYS REC'D	DOCKET NO:
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DESCRIPTION:

Ltr re our 8-7-73 ltr.....submitting add'l info in regard to the actions taken to prevent spill of radioactive fluids .

ENCLOSURES:

ACKNOWLEDGED

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PLANT NAME: H.B. Robinson Unit #2

FOR ACTION/INFORMATION 9-11-73 JB

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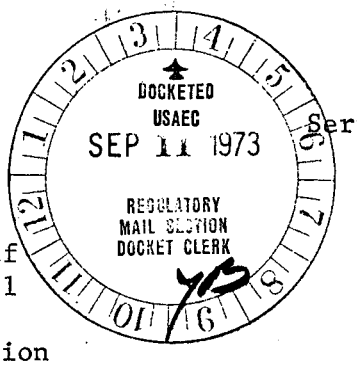
Carolina Power & Light Company

September 5, 1973



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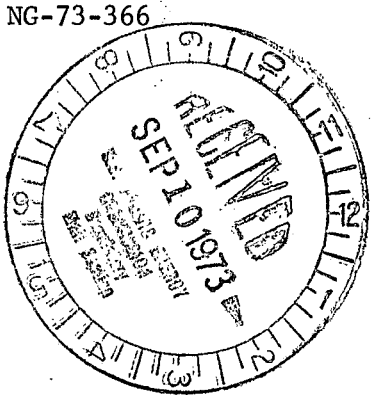

Mr. Robert J. Schemel, Chief
Operating Reactors Branch #1
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

50-261

Dear Mr. Schemel:

H. B. ROBINSON UNIT NO. 2
LICENSE DPR-23
CORRECTIVE ACTION TO PREVENT RADIOACTIVE SPILLS

This is in response to your letter of August 7, 1973, requesting information in regard to the present status of actions taken or proposed to prevent the spill of radioactive fluids at the H. B. Robinson plant site. As noted, the need for improvement in this area was brought to our attention by the occurrence of two spills in the spring of 1973. Great concern exists within Carolina Power & Light Company as a result of these incidents and the following is an account of the action that has been taken to prevent such future occurrences. Specific items to be addressed are listed below:

1. Administrative action taken to minimize the possibility and quantity of future spills.

2. Status of high level alarm for Refueling Water Storage Tank (RWST).

3. Status of rerouting of overflow from RWST.

4. Status of modification of auxiliary building doorways to positively contain spills.

5. Other proposals to reduce the likelihood of uncontrolled releases.

Administrative Action Taken to Minimize Spills

Specific action taken to prevent reoccurrence of one of the previous spills, overpressurization of a portion of the spent fuel pit purification piping, consisted of tagging the system interface spectacle flange with instructions as to the consequences of removing the blank from the flange.

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6846

Of a more general nature, the problem has been extensively discussed at Plant Management and Plant Nuclear Safety Committee meetings. The result of this has been a program of emphasizing the serious implications of radioactive spills to all plant personnel working in radiation control areas. Also, instructions concerning safe handling of radioactive fluids have been administered. This effort has been carried out through the organization line via individual foremen. In addition, refresher courses in radiation control have been given to selected personnel by the plant health physics staff. Plant operators have been cautioned to monitor tank levels closely, particularly when transferring liquids. Response to this program has been good and has led to a conscientious effort on everyone's part to eliminate radioactive spills at the H. B. Robinson Unit No. 2.

Suggestions were solicited from all plant employees, and a large number of personnel responded. Each of these suggestions is being evaluated for possible implementation.

Status of High Level Alarm on RWST

A high level alarm was installed on the RWST on May 15, 1973. The alarm consists of a single comparator set to actuate at 95% of the transmitter range of 390". Tank overflow occurs at approximately the 98% level. Therefore, the alarm will annuciate prior to reaching the overflow level providing sufficient time to take corrective action to prevent overflow. The alarm annuciates in the plant control room.

Status of Rerouting of RWST Overflow

A permanent RWST overflow line routing overflow water to the auxiliary building drain system was installed in July. The line is a 4" welded, stainless steel, gravity drain arrangement. This installation eliminates the overflow from discharging to the storm drains. Now the water is diverted to the waste disposal system where it can be properly contained and treated for controlled release.

Modification of Auxiliary Building to Contain Spills

It has been decided that a positive means is needed to contain potential radioactive spills within the auxiliary building. At present, any high volume spill could conceivably overburden the capacity of the building floor drains and discharge from the building over the numerous doorway sills. Each doorway presents a unique arrangement and special barriers will be designed for each application. The barriers will consist of permanent concrete structures, some four inches in height. Plans are being finalized as to the exact configuration of each of these devices. The barriers are to be installed as soon as possible, and it is anticipated that the work will be completed within the next two months.

Other Proposals to Reduce Uncontrolled Releases

Various other suggestions have been studied as a means of reducing uncontrolled releases. Following is a summary of the items that will be implemented.

All drains within the radiation control areas are to be color coded to identify where the drainage will be collected (i.e. - auxiliary building sump, fuel building sump, and storm drains). Each drain will be physically verified and marked. This should reduce the possibility of an inadvertent release.

Along these same lines, a procedure is being written to establish steps to be taken in the use of temporary hoses within a radiation controlled area. The use of such hoses is required on occasions for transfer of contaminated fluids. The procedure will assure that proper controls are maintained concerning such temporary arrangements.

In the area of administrative controls, there are three programs that bear mentioning in relation to reducing uncontrolled releases. First of these is a newly formulated orientation instruction for all new plant employees. This program will be utilized, among other things, to emphasize the importance of using precautions when handling radioactive fluids and will assure that the employee is familiar with pertinent plant procedures.

A refresher course in plant procedures has also been recently instituted. This course will be conducted on an annual basis and will consist of classroom review sessions for each plant personnel group. The review will include procedures related to the daily functions of the specific groups and will accordingly cover each area in which the worker will come in contact with the handling of contaminated fluids.

This refamiliarization program will reemphasize the importance of using proper radiation controls and safety precautions.

A final session that will cover the handling of contaminated fluids is reactor operator retraining. The program is to be finalized this fall. Operators will be instructed in the importance of closely following procedures and the use of caution in all their daily operating functions.

The above actions summarize the present status of our plans for reducing the probability of uncontrolled radioactive releases. In the opinion of Carolina Power & Light Company, the implementation of these programs will significantly reduce the probability of radioactive liquid spills.

JH:DBW:mvp

Yours very truly,

E. E. Utley
Vice-President
Bulk Power Supply

cc: Messrs. C. D. Barham
N. B. Bessac
B. J. Furr
D. V. Menscer
D. B. Waters