

USNRC REGION II
ATLANTA, GEORGIA

CP&L

Carolina Power & Light Company

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H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

OCT 22 1982

Robinson File No: 13510E

Serial: RSEP/82-1733

Mr. James P. O'Reilly
Regional Administrator
USNRC Region II
101 Marietta Street, N. W.
Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT 82-31

Dear Mr. O'Reilly:

Carolina Power and Light (CP&L) has received and reviewed the subject report and provides the following response:

Violation "A" - Severity Level IV (IER-82-31-04-SL4)

Technical Specification 6.13.1.b requires that each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr shall be provided with locked doors to prevent unauthorized entry into such areas.

Contrary to the above, an area in the drumming room with a radiation level above 1000 mrem/hr was not locked as required. This area was identified on August 25, 1982, by the Licensee as not being able to be secured and no action was taken to prevent unauthorized entry into the area.

Response

(1) Admission or Denial of Alleged Violation

Carolina Power and Light Company acknowledges the violation.

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(2) Reason for the Violation

On August 25, 1982, a Radiological Control (RC) Technician on the 0000-0800 shift found that the cage fence door lock could not be secured and reported this situation in the RC Technician shift turnover log book. At this time no one else was notified. The on-duty RC Foreman was made aware of the situation later in the day and corrective action was taken.

(3) Corrective Steps Which Have Been Taken and Results Achieved

The area in question was completely blocked off with water filled drums stacked to a height of six (6) feet leaving just enough room for the drumming room hoist to move freely. This action has resulted in the area being completely blocked off which is comparable to having a solid wall.

(4) The Corrective Steps Which Will Be Taken to Avoid Further Violation

Corrective measures have already been taken as stated in Step 3 of this response.

(5) The Date When Full Compliance Will Be Achieved

Full compliance has been achieved as stated above.

Violation "B" - Severity Level V (IER-82-31-05-SL5)

Technical Specification 6.11 requires that procedures shall be prepared consistent with the requirements of 10CFR20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposures.

- (1) Health Physics Procedure HP-7, "Radiation Work Permit", Section 5.13.1, requires for "non-routine" RWPs and prior to performing work under the RWP, that personnel shall read and understand the provisions of the RWP.

Contrary to the above, Health Physics Procedure HP-7 was not adhered to in that personnel were observed drumming evaporator bottoms while being signed in on a "routine" RWP used for general decontamination. These personnel were not aware that an RWP for this operation existed; and, therefore, had not read the requirement of the proper RWP.

- (2) Health Physics Procedure HP-28, "Control of Personnel Contamination and Decontamination Techniques", Section 3.2.1.2, requires that a personnel contamination record, Form HP-28-1, shall be completed if it is confirmed that an individual is contaminated.

Contrary to the above, Health Physics Procedure HP-28 was not adhered to in that a personnel contamination report was not completed when a frisker alarmed indicating contamination on the inspector's hand.

Response

(1) Admission or Denial of Alleged Violation

Carolina Power and Light Company acknowledges the violation.

(2) Reason for the Violation

(a) Violation B, Part (1)

Section 5.13.1 of HP-7 (Revision 11) requires that "prior to performing any work under a 'non-routine' RWP" all personnel shall read and understand all the provisions of that RWP. At the time of this violation, RWP #2 allowed decontamination personnel to enter all areas of the plant and "dress as posted for the area". RWP #13 is a non-routine RWP specifically for entering the drumming room. Although the decontamination personnel were only aware of and only read RWP #2, all provisions of RWP #13 were followed while the work was performed.

(c) Violation B, Part (2)

Section 3.2.1.2 of HP-28 (Revision 2) states that upon confirmation that an individual is contaminated, a Form HP-28-1 shall be completed. The control point technician was aware of this procedure. The inspector's report states that a second frisking was performed resulting in a second alarm. The inspector subsequently stated that he made a successful decontamination attempt. The inspector then reported that he asked the technician if a personnel contamination report needed to be completed. The technician replied that a form did not need to be completed. This response is not in accordance with procedure HP-28, and it is a violation of that procedure.

(3) The Corrective Steps Which Have Been Taken and Results Achieved

(a) Violation B, Part (1)

RWP #2 has been altered so that decontamination personnel are only allowed to pick up trash and clean up in a Radiation Area. They may not enter a High Radiation Area or Locked High Radiation Area without obtaining and fulfilling all the provisions of a non-routine RWP.

(b) Violation B, Part (2)

After the incident, all technicians were cautioned on the correct course of action that shall be taken in order to comply with procedure HP-28.

(4) The Corrective Steps Which Will Be Taken to Avoid Further Violation

(a) Violation B, Part (1)

The corrective actions stated above in Section 3 should be sufficient to avoid further violation.

(b) Violation B, Part (2)

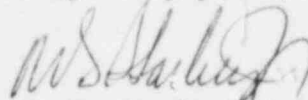
A training course was given to all frisker technicians, specifically on HP-28 and the personnel contamination report.

(5) Date When Full Compliance Will Be Achieved

Full compliance was achieved on October 8, 1982.

If you have any questions concerning this response, please contact me.

Very truly yours,



R. B. Starkey, Jr.
General Manager
H. B. Robinson SEG Plant

CLW/bss

cc: R. C. DeYoung