

January 5, 1976

File: NG-3513 (R)

Serial: NG-75-2264

Mr. Norman C. Moseley, Director
U. S. Nuclear Regulatory Commission
Region II - Suite 818
230 Peachtree Street, N.W.
Atlanta, Georgia 30303

Dear Mr. Moseley:

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT 2
DOCKET 50-261
IE INSPECTION REPORT 75-14

Findings of the subject inspection are addressed below. In addition to the enforcement item, Item VI which regards a significant finding is also discussed as requested. We have reviewed the report and find that there is no information of a proprietary nature contained therein.

Item I - Failure to Follow Radiation Control Procedures

The first item of concern regarding this finding was the failure to fully comply with Plant Procedure HP-11 when conducting survey instrument calibration. Specifically, the actual dose rate and instrument response were not recorded.

Corrective Action

The immediate corrective action to rectify this situation will be the quarterly calibration of survey instruments which shall be completed by January 31, 1976. The results of this calibration shall be recorded in detail and documented as required by the Health Physics Procedure HP-11.

Corrective Action to Prevent Further Non-Compliance

The E&RC Supervisor, who is responsible for assuring that the subject calibration is performed, has reviewed the procedure and briefed his foremen regarding the necessity for adhering to the procedure requirements. They in turn have impressed the need for this documentation on their subordinates and will continue to follow the item to assure compliance. The effectiveness of this action will be borne out by the results of the calibration discussed above.

The second item reported under this finding involved use of

Geiger-Mueller (GM) instruments to conduct surveys in areas greater than 5 mrem/hour. This was contrary to Health Physics Procedure HP-1 which required use of Teletectors or ion chamber instruments.

Corrective Action

A procedure change has been initiated to permit use of a Geiger-Mueller instrument for the subject surveys. It is felt that the original procedure was overly restrictive in prohibiting the GM's use. Meaningful results can be obtained by using any of the instruments. Revision of the procedure shall thus prevent its violation.

Corrective Action to Prevent Further Non-Compliance

The procedure change discussed above will prevent recurrence of this problem. Final procedure approval is anticipated prior to January 31, 1976.

This finding additionally refers to a concern for the concept of compliance with all procedures, not just compliance with the specific cases that were cited. The report refers to items of previous inspection 50-261/75-11. Of the six items of concern it is felt that only four represent noncompliance with existing procedures. The two other problems involved differences in interpretation. Specifically, the recording of personnel exposure data (completion of NRC Form 5 for extremities) and use of the GM instrument for surveys required procedure changes to clarify the requirements.

Nonetheless that leaves four items which are acknowledged as failures to follow procedure. It is felt that these violations of procedure did not constitute or threaten to cause an unsafe condition in the operation of the plant. This is not to say that we are not concerned by the inadequacies in implementation. The importance of one of the items (labeling of radioactive material containers) was emphasized by a training session to refresh all cognizant parties concerning the requirements and the necessity for procedural compliance. Two of the items (exposure reports) were corrected by establishing more positive administrative controls to prevent oversights in timely exposure reporting. The final item (survey instrument calibration) involved laxity in procedural implementation and this matter was directly addressed and discussed with the cognizant foreman. It is felt that through this means adequate control and auditing can be accomplished. The calibration is accomplished at quarterly intervals, and it is felt that no stricter administrative controls are warranted.

To assure that all health physics procedures are viable and will thus be used, a review process is being conducted to revise the instructions

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to provide relevant information. Additionally, training sessions have been conducted to familiarize the cognizant technicians of the existing procedures and the importance of their compliance.

Item VI - No Provisions for Recording "As-Found" and "As-Left" Conditions During Periodic Testing

As noted, there are several periodic tests that do not have provisions for recording "as-found" and "as-left" conditions. To assure that such provisions are included, a review of all periodic tests is being conducted. This review includes some nineteen instrumentation and control tests, twenty-five operations' tests, and fifty which are engineering tests. This review was initiated on December 23, 1975, and it is anticipated that the revision process will be completed by March 1, 1976. Of the thirteen tests that were previously reviewed only two were found deficient. The omission of the ANSI 18.7 requirements regarding the two tests in question was inadvertent, and it is not felt that there are many more instances where the problem exists. The review and revision process will correct immediate problems, and the review of any future tests by the PNSC should prevent any recurrence of the deficiency.

Yours very truly,



E. E. Utley
Vice-President
Bulk Power Supply

CSB:mvp

REGION II

FEEDER 1 SECTION REPORT IDENTIFICATION SHEET

TO: A.F. Gibson
(Supervisor of Performing Inspector)

Licensee Caroline Power & Light
H.B. Robinson Unit 2

Inspection Dates Nov 10-14, 1975

Other Inspectors none

Feeder Report Prepared by G.L. Troup

Inspectors Evaluation (continue on attached sheet, if necessary)

Principal area problem area appears to be the licensee's attitude or concept of adherence to the requirements in approved plant procedures.

* The letter forwarding the inspection report should request a statement or commitment from licensee management concerning adherence to procedures and actions which will be taken to assure adherence.

G.L. Troup
Signature

TO: R.C. Lewis

The attached Feeder Inspection Documentation is transmitted in reviewed and approved form.

Comments: 11/17/75

A.F. Gibson
Signature

12/3/75
date