



USNRC REGION II
ATLANTA, GEORGIA

Carolina Power & Light Company

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

FEB 24 1983

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Robinson File No: 13510E

Serial: RSEP/83-219

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
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
REVISED RESPONSE TO IE INSPECTION REPORT 82-31

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) submitted a response to the subject inspection report on October 22, 1982. In a follow-up Quality Assurance audit of that response, CP&L has identified a misunderstanding in the Violation B, Item 1, "Corrective Steps Which Have Been Taken and Results Achieved," response. Please consider the following revised response to Violation B, Item 1.

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 exposure.

- (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.

Response

(1) Admission or Denial of Alleged Violation

Carolina Power and Light Company acknowledges the violation.

(2) Reason for Violation

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.

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

The routine RWP for decontamination work will be revised to allow for general decontamination in all areas except for Locked High Radiation, High Radiation, and High Contamination Areas. In these three areas, a non-routine RWP will be required for general decontamination work.

The routine RWP, however, allows for trash and laundry pick-up at the entrances to Locked High Radiation, High Radiation, and High Contamination Areas.

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

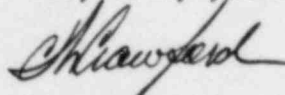
The corrective actions stated above in Section 3 should be sufficient to avoid further violation.

(5) Date When Full Compliance Will Be Achieved

Full compliance will be achieved on February 28, 1983.

If you have any questions concerning this revised response, please contact my staff or me.

Very truly yours,



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

CLW:JMC/bss

cc: R. C. DeYoung