

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD ¹⁸³ OCT -3 P3:28

In the Matter of)

CAROLINA POWER & LIGHT COMPANY)

(H. B. Robinson Steam Electric
Plant, Unit 2))

Docket No. 50-261-OLA

ASLBP No. 83-484-O3LA

OFFICE OF SECRETARY
DOCKETING & SERVICE

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APPLICANT'S FURTHER ANSWERS TO
THE HARTSVILLE GROUP FIRST SET OF INTERROGATORIES - PURSUANT TO
LETTER AGREEMENT DATED SEPTEMBER 1, 1983

* * * * *

Dear Mr. Matthews:

Pursuant to the signed letter agreement dated September 1, 1983, between George F. Trowbridge, Counsel for Applicant, and you as Representative for the Hartsville Group, Applicant herein sets forth its answers:

INTERROGATORY NO. 1-34. Have any C P & L employees or contractor or subcontractor employees been warned, counseled, disciplined, transferred, demoted, penalized, suspended or terminated as a result of non-compliance with NRC operating and administrative procedures, rules or regulations at any licensed facility or for actions under any NRC license since January 1, 1978? Identify the name, title, dates of employment, address and telephone number of each such employee; describe in detail the action taken, the reason for each such action, the procedures, rules or regulations not complied with, and the safety significance of such non-compliance.

ANSWER NO. 1-34. Yes. This response relative to the characterized "Disciplinary Actions" to CP&L employees is based on (a) a file search of documents related to the non-compliances covered by an NRC notice of violation and CP&L's response thereto since January 1, 1978, and, where such documents reveal pertinent employee names, (b) a review of the personnel record of the CP&L employee(s) involved. Where documents did not specify employees by name, inquiries were made which resulted, in certain instances, in a determination of specific names. The violations or claims of violations since January 1, 1978 are as represented by Applicant's responses identifying and responding to each violation. Copies of said responses have been previously furnished to the Hartsville Group in connection with Applicant's ANSWERS 1-30, 1-31 and 1-35 (First Set).

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The following information references the nuclear plant involved, the Inspection Report # and date of CP&L's response, the action taken as to the employee(s), and the incident involved. The procedures, rules or regulations not complied with and safety significance of the violations are as set forth in said responses.

* * * * *

H. B. Robinson Unit 2

<u>INSPECTION REPORT</u>	<u>DATE OF RESPONSE</u>	<u>INCIDENT INVOLVED</u>	<u>ACTION TAKEN</u>
78-13	7/26/78	A chain holding up a radiation area sign had broken loose from the wall and a Radiation Control Technician was instructed to submit a trouble ticket for the repair of the chain. The technician failed to perform this task.	Employee involved was reprimanded and counseled.
79-14	8/22/79	Individuals entered the reactor containment, which was a locked, high radiation area, without entering their names on a valid radiation work permit.	Employees were counseled.
79-29	2/5/80	Fire protection program states that every connection from a yard main to a building be equipped with a post indicator valve, and large yard main systems must be provided with sectional controlling valves at appropriate points. However, the yard main connection to the Auxiliary Building interior fire hose system was not provided with a post indicator valve and a post indicator sectional control valve was not provided for the northeast portion of the water main loop. This was a result of an FCR (field change request) made by Construction that was disapproved by Engineering but the change was actually made.	All parties involved were made aware of the incident and cautioned to prevent further occurrence.
80-24	11/12/80	Field documents used to verify the as-built for safety-related system ISO-RC-4 did not have any records of inspection of clearances for the wall penetrations.	Employees involved were cautioned and counseled.

<u>INSPECTION REPORT</u>	<u>DATE OF RESPONSE</u>	<u>INCIDENT INVOLVED</u>	<u>ACTION TAKEN</u>
81-07	7/30/81	An Auxiliary Operator was climbing in the overhead piping in the Boric Acid Evaporator Room wearing only shoe covers and gloves instead of anti-contamination clothing which were required.	Employee involved was reprimanded.
	1/29/82	An individual was observed in the Boric Acid Evaporator Room without a dose rate survey instrument.	Employee involved was reprimanded.
81-10	6/17/81	Radiation surveys of the hot leg compartment inside Steam Generators A, B, C performed 9/17/80 were not maintained or preserved.	Employees involved were cautioned as to the importance of retaining all survey documentation.
81-20	9/10/81	Changes were made in the Gas Calibration step of procedure RCP-1, without prior review by Plant Nuclear Safety Committee or approval by the General Manager.	Employees involved were cautioned.
81-31	12/22/81	An operator failed to follow valve lineup procedure OP-38A for positioning of valve RHR-764 from locked open to locked shut position.	Employee involved was counseled regarding the seriousness of improper performance of valve lineups.
82-04	4/15/82	Equipment control policy was not implemented in that Local Clearance and Test Request 113 listed incorrect auxiliary feedwater system valves for the maintenance performed, and clearance was canceled without opening the isolation valve for a local suction pressure gauge.	Employees directly involved were admonished.
82-33	12/2/82	QA audits were not performed within the 24 month frequency.	Employees (CQA) responsible were counseled by the Corporate QA, not by the HBR management.
82-42	3/4/83	Various Fuel Shuffle procedures were not implemented during the 12/26-12/28 fuel movement.	Employee involved had disciplinary action taken against him involving loss of pay. The employee's Shift Foreman was counseled.

<u>INSPECTION REPORT</u>	<u>DATE OF RESPONSE</u>	<u>INCIDENT INVOLVED</u>	<u>ACTION TAKEN</u>
83-08	6/22/83	Disposal of 1 gallon of liquid waste containing licensed material by way of Chem-Nuclear Systems, Inc., SC, who was not authorized to receive liquid waste.	Employees responsible were admonished and counseled.

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BRUNSWICK STEAM ELECTRIC PLANT

78-17	9/20/78	Individual was observed not wearing the required protective clothing as specified.	Employee involved was counseled on importance of radiation control techniques.
79-04 79-03	3/12/79	After an individual had received an exposure in excess of 5 rem (whole body), Licensee failed to submit a written report within 30 days.	Employees involved were counseled on value of prompt submittals.
79-07	4/2/79	Reviewers failed to notice out of specification stroke time for valve FO46 during RCIC Pump and Valve Operational Test.	Employee involved was counseled.
79-26	7/24/79	Two Auxiliary Operators without lab coats entered a contamination area in the Reactor Building which required lab coats for entry.	Employees involved were counseled by the Shift Foreman.
79-33 79-34	10/25/79	QA Test results had discrepancies that had not been identified by Licensee's review process.	Employees involved were cautioned about seriousness of not recognizing and evaluating deficiencies.

<u>INSPECTION REPORT</u>	<u>DATE OF RESPONSE</u>	<u>INCIDENT INVOLVED</u>	<u>ACTION TAKEN</u>
79-37	12/20/79	A fire protection sprinkler and stand-pipe system for the No. 3 Diesel Generator was isolated and the continuous fire watch was not stationed.	Employees involved were counseled regarding the proper actions to take.
80-37	1/13/81	Valve lineup verification documentation showed that locked valve PT46.1, RCIC, and HPCI turbine exhaust manual stop check valves were verified open, when in fact both were closed.	Appropriate corrective or disciplinary actions for employees were taken - two Shift Foremen received no nuclear license supplement pay for one week; two Auxiliary Operators given one day off with no pay.
80-38 80-41	12/30/80	Sampling and analysis of airborne particulate radioactivity was inadequate: 40% of total particulate activity in Reactor Building roof vents were not identified.	Involved RC&T technicians were counseled.
80-42 80-39	2/3/81	Training requirements for BSEP QA Surveillance Personnel, which had not been revised since 9/75, referenced procedures that no longer existed and did not cover more than 25 standards and procedures that were then a part of QA Control.	Appropriate employees were counseled.
80-44 80-46	12/18/81	Various vent monitors were found to be inoperable due to lack of maintenance.	Technicians responsible were counseled.
81-09	7/1/81	Approval requirements for temporary changes made to procedures RC-ER-12 and RC-ER-18 were not met.	Employees involved were counseled.
81-14	8/26/81	As a result of operator error, the reactor mode switch was taken out of the refueling mode, placed in startup, and controlled withdrawal commenced with the A-loop RHR torus suction valve shut.	Disciplinary action was taken with the employees involved. Letter of reprimand placed in file for one year period.

<u>INSPECTION REPORT</u>	<u>DATE OF RESPONSE</u>	<u>INCIDENT INVOLVED</u>	<u>ACTION TAKEN</u>
81-16	10/30/81	Radiation Hazards Survey concerning repair of a valve was inadequate, causing a worker to exceed dose limit.	All three employees involved were counseled and disciplinary action was taken - one employee was given two weeks off without pay; two employees were assigned to Caswell Beach Pumping Station.
81-19	10/6/81	Two employees were observed in posted radiation areas without proper dress.	Employees involved were counseled.
81-20	10/12/81	An inadvertent release of approximately 300 gallons of liquid waste from the "B" floor drain sample tank without prior sampling for gross activity.	Employee involved was counseled.
		Temporary changes to PT-A3 Rev. 0 and OP-50.1 Rev. 13 were approved by Plant Nuclear Safety Committee in 16 and 17 days instead of the required 14 days from implementation date.	Operations employees were cautioned.
81-24	11/2/81	Inoperable instrumentation channel was not placed in the tripped mode within one hour of determination that this instrumentation could not be calibrated.	All Senior Reactor Operators were counseled as well as I&C periodic testing personnel.
81-28	11/30/81	Temporary change to Liquid Radioactive Waste Processing System Procedure was not reviewed although it remained in effect through August 1981.	Operations employees were cautioned.
82-01	3/11/82	A primary coolant sample taken at 2100 hours exceeded .2 UCi/gram dose equivalent I-131, and the subsequent samples required once per 4 hours were not taken.	Employees involved were counseled.

<u>INSPECTION REPORT</u>	<u>DATE OF RESPONSE</u>	<u>INCIDENT INVOLVED</u>	<u>ACTION TAKEN</u>
82-02	8/16/82	Reactor vessel water level low instrumentation (transmitter), required by Technical Specifications, was inoperable. However, trouble ticket was prepared, stating that the transmitter was not required by Technical Specifications.	Employees involved were counseled.
82-05	4/30/82	Shift Foremen failed to complete an Event Evaluation Check Sheet or make entry in the Shift Foremen's log when informed that the Standby Liquid Control heat tracing circuits were inoperable.	Employees involved were counseled.
82-18	7/2/82	1A-1 battery charger was momentarily not positioned as per clearance procedure, and service water vital header crosstie valve was not positioned as per operating procedure.	Two operators responsible were counseled.
82-30	8/5/82	Contrary to Technical Specification 6.8.1(a), Regulatory Guide 1.33 Appendix A was not implemented in that safety-related equipment maintenance instruction was not correctly performed.	Technician involved was counseled.
83-03	6/24/83	Reactor Water Cleanup System was not isolated, as required by Table 3.3.2-1 Item 3.a, within one hour.	Senior Reactor Operator was removed from licensed duties for two weeks and during that time was counseled.
83-17	8/11/83	Unit 2 augmented off-gas system was out of service and the air ejector off-gas monitors were inoperable, yet a reactor shutdown was not initiated.	On-shift personnel (excluding radioactive waste and fire protection) were immediately counseled. One Control Operator was removed from licensed duties with loss of license supplement pay for 14 days. Approximately 10 Shift Operating Supervisors, Shift Foremen, and Control Operators involved were given verbal reprimands evidenced by memo to their files.

<u>INSPECTION REPORT</u>	<u>DATE OF RESPONSE</u>	<u>INCIDENT INVOLVED</u>	<u>ACTION TAKEN</u>
83-18	8/4/83	A representative air sample was not collected in an individual's breathing zone while he was splitting radioactive waste bags containing material with unknown contamination levels and radiation levels of 30 mrem/hr.	The Health Physics Technician involved was been counseled.
<p style="text-align: center;">* * * * *</p> <p style="text-align: center;"><u>SHEARON HARRIS NUCLEAR POWER PLANT</u></p>			
81-20	11/17/81	Tests were improperly performed on concrete cylinders due to excessive loading.	Concrete Compressive Testing certification for the technician involved was rescinded until the technician passed both oral and written exams.
82-01	3/25/82	Weld inspector failed to identify and report deficiencies because he did not see them.	Employee responsible was removed from pipe weld inspection, pending reinstruction.
82-06	4/23/82	Weld inspector either overlooked or arbitrarily failed to reject defects in welds.	Employee responsible was removed from pipe weld inspection and is no longer employed by CP&L.

INTERROGATORY NO. 1-36. What are the bases for your responses to Interrogatories 34 and 35? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.

ANSWER NO. 1-36. The bases of the response set forth in Answer 1-34 are the documents as described in said Answer.

INTERROGATORY NO. 1-38. Identify in detail any instances in which allegations have been made of pressure, intimidation, harassment, encouragement, direct orders, suggestions, or inducement of any sort of employees of C P & L or its contractors or subcontractors intended to result in the violation of or non-compliance with NRC operating and administrative procedures, rules or regulations. For each such instance, set forth the name, address and telephone numbers of the person(s) making the allegation or involved in the matter alleged, describe fully any investigations made by C P & L or the NRC Staff, and describe in detail any actions taken.

ANSWER NO. 1-38. This response relative to the characterized "Allegations of Harassment" of CP&L employees is based on (a) a file search of documents related to the non-compliances covered by an NRC notice of violation and CP&L's response thereto since January 1, 1978, and, where such documents reveal pertinent employee names, (b) a review of the personnel record of the CP&L employee(s) involved. The violations or claims of violations since January 1, 1978 are as represented by Applicant's responses identifying and responding to each violation. Copies of said responses have been previously furnished to the Hartsville Group in connection with Applicant's ANSWERS 1-30, 1-31 and 1-35 (First Set).

CP&L's said document search has identified no instance of an allegation of any of the types described in Interrogatory No. 1-38.

INTERROGATORY NO. 1-39. Identify in detail all documents reflecting disagreements, disputes or differences of opinion between employees of CP&L and their supervisors or C P & L management regarding compliance or sufficiency of compliance with NRC operating and administrative procedures, rules or regulations. Include the subject, date, names of persons involved and resolution for each such instance.

ANSWER NO. 1-39. CP&L has made additional inquiry of each plant general manager and past plant managers covering a period from January 1, 1978 to the present. Such additional inquiry discloses no documents of a kind described in Interrogatory No. 1-39.

The following further response relative to the characterized "Disagreements" between CP&L employees and their supervisors/managers is based on a file search of documents related to the non-compliances covered by an NRC notice of violation and CP&L's response thereto since January 1, 1978. The violations or claims of violations since January 1, 1978 are as represented by Applicant's responses identifying and responding to each violation. Copies of said responses have been previously furnished to the Hartsville Group in connection with Applicant's ANSWERS 1-30, 1-31 and 1-35 (First Set).

CP&L's said document search has identified no documented instance of disagreements of the types described in Interrogatory No. 1-39.

INTERROGATORY No. 8-27. Is the on-site storage of the SGLAs the preferable option for disposal of the SGLAs?

ANSWER 8-27. Yes.

INTERROGATORY NO. 8-28. What are the bases for your response to Interrogatory 27?

ANSWER 8-28. The bases for this response are given in detail in Section 3.5 "Disposition of Steam Generator Lower Assemblies (SGLA)" of the FSGRR, Rev. 1.

INTERROGATORY NO. 8-41. What is the basis for the determination that no cask is needed for transporting the SGLAs from the reactor containment building to the SGLA vault?

ANSWER 8-41. Casks for the shipment of radioactive material are used primarily to prevent the release of radioactive material under accident conditions possible during transport on the public roadways. The transfer of the SGLAs from the reactor containment building (RCB) to the long-term storage building will be over a very short distance, within an area where public access is controlled and under special handling procedures discussed in the FSGRR. Because of these conditions, no cask is required for this transfer. In addition, the radioactive material contained within the SGLAs will be sealed and the outer surface of the SGLAs will be covered and/or decontaminated before removal from the RCB. Thus, no radioactive material will be released during the transfer of the SGLAs from the RCB to the long term storage building.

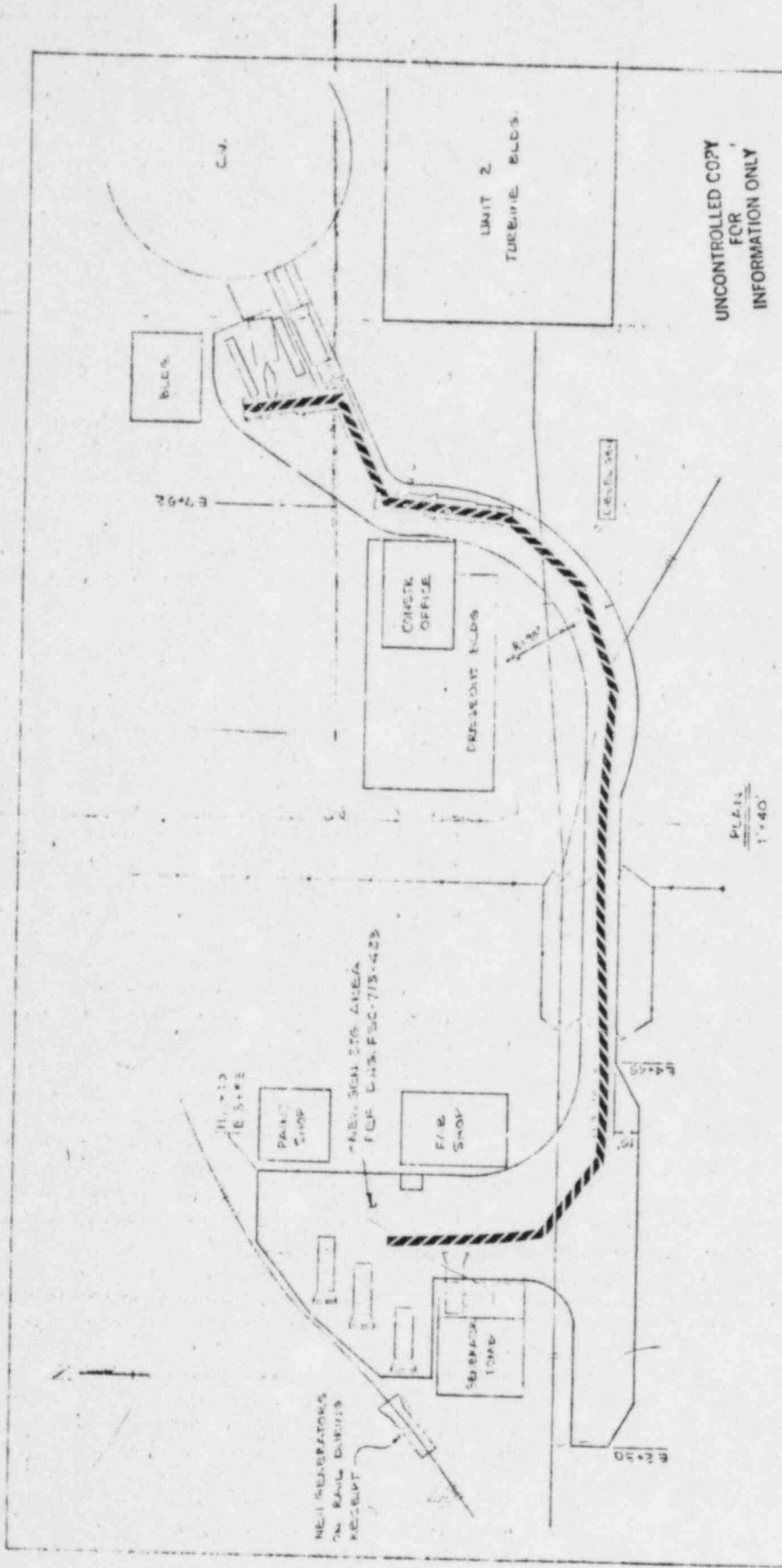
INTERROGATORY NO. 8-42. What route will the truck take to haul the SGLAs from the RCB to the SGLA vault?

ANSWER 8-42. Drawing FSC-713-465, attached hereto, depicts the routing of the lower assemblies to be removed. This drawing should replace Figure 3.1-1 (in FSGRR) in the list of figures.

INTERROGATORY NO. 8-43. Describe in detail the design and construction of the special tractor-trailer arrangement to be used to haul the SGLAs from the RCB to the SGLA vault.

ANSWER 8-43. The tractor-trailer combination to be used is standard rental equipment for heavy haul utilization. CP&L presently will rent a Talbert trailer, Model

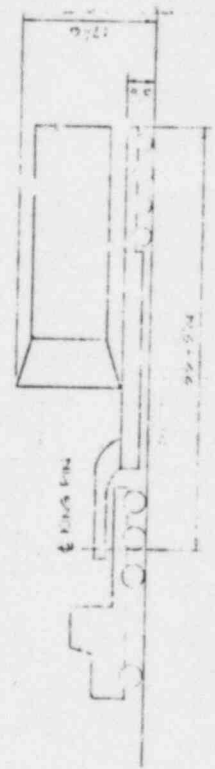
TT4LW-250-FG-T1 or TT4LW-200-RG-1-T1. These trailers are available (for rental) from several companies. The tractor to be utilized will most likely be a tri-axle "Mack" tractor with air-lift suspension.



UNCONTROLLED COPY
FOR
INFORMATION ONLY

NOTES:

1. ROUTE OF OLD S/G LOWER ASSEMBLY
2. CLEAR LOCATIONS BASED ON CLASS 7107 300 TON CRANES SPECIFICATIONS. TUBULAR BOWNA BOTTOM CRACKS 12-18" 5' 2" RADIUS 14' SPACINGS FULLY ESTIMATED.
3. TRAILER: A'S USED BY FPL.



SIDE VIEW - TRAILER 14' 0" L x 6' 0" W

CALCULATED BY: [Signature]	
CHECKED BY: [Signature]	
DATE: 9/13/83	
SCALE: AS SHOWN	
ROUTE OF OLD S/G LOWER ASSEMBLY	
FSC-713-465.0	

APPROVED FOR CONSTRUCTION

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY) Docket No. 50-261-OLA
)
(H. B. Robinson Steam Electric) ASLBP No. 83-484-03LA
Plant, Unit 2))

DARLINGTON COUNTY)
)
SOUTH CAROLINA)

Richard E. Morgan

Lillian M. Stokes
Notary Public

My commission expires: 5-28-86

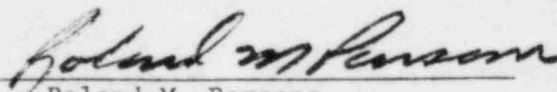
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket No. 50-261-OLA
)	
(H. B. Robinson Steam Electric)	ASLBP No. 83-484-03LA
Plant, Unit 2))	

AFFIDAVIT OF ROLAND M. PARSONS

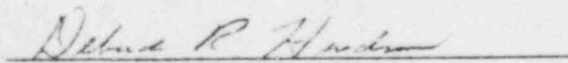
WAKE COUNTY)
)
NORTH CAROLINA)

Roland M. Parsons, being duly sworn according to law, deposes and says that he is Project General Manager with Carolina Power & Light Company; that the Answers to Interrogatories 1-34, 1-36, 1-38 and 1-39 contained in Applicant's Further Answers to The Hartsville Group First Set of Interrogatories - Pursuant to Letter Agreement dated September 1, 1983, are true and correct to the best of his knowledge, information and belief insofar as the same pertains to Shearon Harris Nuclear Power Plant, and that the sources of his information are officers, employees and agents of Carolina Power & Light Company.



Roland M. Parsons

Sworn to and subscribed before
me this 28th day of September, 1983.



Notary Public

My commission expires: My Commission Expires 4-20-86

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket No. 50-261-OLA
)	
(H. B. Robinson Steam Electric)	ASLBP No. 83-484-03LA
Plant, Unit 2;)	

AFFIDAVIT OF B. H. WEBSTER

County of Wake)
)
State of North Carolina)

B. H. Webster, being duly sworn, according to law, deposes and says that he is Manager - Radiological & Chemical Support Section of Carolina Power & Light Company; that the answers to Interrogatories 8-27, 8-28, and 8-41 contained in Applicant's Answers to The Hartsville Group First Set of Interrogatories to Applicant, Carolina Power & Light Company, are true and correct to the best of his information, knowledge and belief; and that the sources of his information are officers, employees, agents and contractors of Carolina Power & Light Company.

B. H. Webster
B. H. Webster

Sworn to and subscribed before
me this 29th day of September, 1983.

Betty J. Hicks
Notary Public

My Commission Expires: September 28, 1985



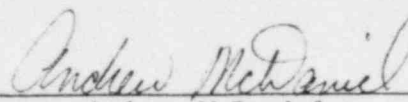
My commission expires: June 4, 1924

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket No. 50-261-OLA
)	
(H. B. Robinson Steam Electric)	ASLBP No. 83-484-03LA
Plant, Unit 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "APPLICANT'S FURTHER ANSWERS TO THE HARTSVILLE GROUP FIRST SET OF INTERROGATORIES - PURSUANT TO LETTER AGREEMENT DATED SEPTEMBER 1, 1983" were served this 30th day of September, 1983 by depositing in the United States mail, first class, postage prepaid, to the parties on the attached SERVICE LIST. The affidavit of C. R. Dietz, as to Interrogatories 1-34, 1-36, 1-38 and 1-39 with respect to the Brunswick Plant, is not attached to said ANSWERS and will be subsequently provided.



Andrew McDaniel

September 30, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket No. 50-261-OLA
)	
(H. B. Robinson Steam Electric)	ASLBP No. 83-484-03LA
Plant, Unit 2))	

SERVICE LIST

Administrative Judge Morton B. Margulies
Chairman, Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge Jerry R. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge David L. Hetrick
Atomic Safety and Licensing Board
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