



Carolina Power & Light Company

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

JUN 21 1984

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Robinson File No: 13510E

Serial: RSEP/84-434

Mr. James P. O'Reilly  
Regional Administrator  
Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, N. W.  
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSEE NO. DPR-23  
IE INSPECTION REPORT 84-10

Dear Mr. O'Reilly:

Carolina Power and Light Company has received and reviewed the subject report and provides the following response.

A. Severity Level IV Violation (IER-84-10-01-SL4)

10CFR20.203(b) requires that each radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: Caution (or Danger), Radiation Area.

Contrary to the above, the licensee failed to post a radiation area in that on March 23, 1984, a trailer containing fuel sipping equipment with general area radiation levels around the trailer measuring 8 mR/hr was not posted as a radiation area.

Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the alleged violation.

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2. Reason for the Violation

The subject trailer had arrived on site as a radioactive waste shipment and was properly placarded in accordance with DOT regulations. The radiation level 18" from the surface of the trailer was as high as 8 mR/hr. Initial interpretation of 10CFR20.204(d) determined that the trailer could go unposted as a radiation area since it was still placarded in accordance with DOT regulations with the appropriate "RADIOACTIVE" placards. After subsequent review of 10CFR20.204(d), it is agreed that this only applies to those materials that have been prepared for transport in accordance with DOT regulations. The cause of this violation was a misinterpretation and misapplication of the provisions of 10CFR20.204(d).

3. Corrective Steps Which Have Been Taken

Upon notification of the violation, the subject trailer was posted as a RADIATION AREA" as prescribed by 10CFR20.

4. Corrective Steps Which Will Be Taken

Radioactive materials receipt procedure will be revised to ensure that 10CFR20.204(d) is not misapplied in the future. In addition, the appropriate Radiation Control personnel will be trained on the revision.

5. Date When Full Compliance Will Be Achieved

The corrective actions are scheduled to be completed by August 15, 1984.

B. Severity Level Violation IV (IER-84-10-02-SL4)

10CFR20.203(f) requires that each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. The exceptions of 10CFR20.203(f)(3) do not apply.

Contrary to the above, the licensee failed to label a container of radioactive material in that on March 20, 1984, a metal box utilized for holding laundered protective clothing was not labeled with a clearly visible label identifying the radioactive contents of the box.

Response

1. Admission Or Denial Of The Alleged Violation

CP&L acknowledges the violation in part. CP&L disagrees with the statement that the exceptions of 10CFR20.203(f)(3) do not apply. If it could be substantiated that the contents of the subject boxes did satisfy one of the exceptions provided for by 10CFR20.203(f)(3), no violation would have occurred. Since it has not been substantiated that a said exception was applicable in this instance, CP&L acknowledges that a violation occurred.

2. Reason For The Violation

The subject boxes contained laundered protective clothing and were posted as "RADIOACTIVE MATERIALS". The postings were weathered to the point that they were no longer clearly visible.

3. Corrective Steps Which Have Been Taken

Upon notification of the violation, the subject boxes were labeled as "RADIOACTIVE MATERIAL" as prescribed by 10CFR20. In addition, surveillance by Radiation Control personnel and supervision as well as Plant Quality Assurance personnel has been increased to ensure that other containers that may contain radioactive materials are properly labeled as prescribed by 10CFR20.

4. Corrective Steps Which Will Be Taken

The corrective actions taken are considered adequate to avoid further violations of this nature.

5. Completion Date

Full compliance has been achieved.

C. Severity Level IV Violation (IER-84-10-03-SL4)

10CFR20.103(c)(2) requires certain conditions to be met before a licensee may make allowances for the use of respiratory protective equipment. One condition is that the licensee maintains and implements a respiratory protection program that includes written procedures regarding training of personnel. Health Physics Procedure HPP-102, Respirator Fit-Testing, Section 5.2.2 requires that personnel attend a respiratory training class and pass a test prior to wearing a respirator.

Contrary to the above, during 1983, fifteen licensee personnel wore respirators without first passing a written test.

1. Admission Or Denial Of Alleged Violation

CP&L acknowledges the alleged violation.

2. Reason For The Violation

Plant procedures require a passing grade on a respiratory protection test prior to wearing a respirator. A surveillance was conducted on March 14 - 16, 1984, by H. B. Robinson Plant Quality Assurance personnel in the area of respiratory protection. This surveillance included a review of the grading techniques and grades received on the respiratory protection tests. Several tests which were given and graded by a specific contract instructor were found to be graded improperly. The test results of the 581 individuals trained by this specific instructor were checked. Of this number, 51% were found to have been graded improperly. The tests were then regraded which yielded a 24% failure rate out of the original 581.

An investigation was made into the grading techniques of other instructors. The original sample of 581 was used to determine the appropriate sample (lot) size. Using the sampling tables of Military-SID-105D, which correspond to Enclosure 2 of the Quality Assurance Procedure-205, a sample size of 30 was determined. The test records of 80 random individuals were regraded. The results are that 12 grades were lowered, with 4 of these 12 being failures. That is to say that only 5% of the randomly selected 80 test scores were actual failures. The 4 individuals identified have also been removed from the qualification list. This investigation shows that the high percent of failures was associated with one instructor.

These results have shown that the deficiency lies in the type of testing. The tests had essay type questions, and grading was therefore subjective which in turn led to inconsistent and inaccurate grading.

3. Corrective Steps Which Have Been Taken

Immediate action to correct the problem was taken on March 16, 1984, by removing the names of all personnel known to have failed the test from the computer listing of qualified personnel for respiratory protection. Any of these individuals who are currently wearing respiratory protection devices have been appropriately requalified.

An investigation into the resulting whole body counts of the individuals who failed the respiratory protection test was conducted. Of the individuals who received a terminating whole body count, an upward trend was not identified, and no unusual or excessive body burdens were identified.

A set of objective tests, i.e., multiple choice, true/false, etc. with answer keys has been developed and are currently in use so that there will be no subjectivity involved.

4. Corrective Steps Which Will Be Taken

The corrective actions taken are considered adequate to avoid further violations of this nature.

5. Completion Date

Full compliance has been achieved.

The following response is submitted as requested in the inspection report cover letter. NRC Inspection Report 84-10 discusses a submittal to the Director of Nuclear Reactor Regulation which contained inaccurate statements. While the statements were not material or relevant to the decision made, a concern was expressed that these inaccuracies were not eliminated during the review process.

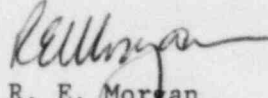
A process has been implemented to ensure a complete review of outgoing correspondence. This should minimize the potential for future inaccurate statements from occurring.



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

Very truly yours,



R. E. Morgan  
General Manager  
H. B. Robinson S. E. Plant

CLW:pb

cc: R. C. DeYoung