



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

Report No.: 50-261/78-20

Docket No.: 50-261

License No.: DPR-23

Licensee: Carolina Power and Light Company
336 Fayetteville Street
Raleigh, North Carolina 27602

Facility Name: H. B. Robinson 2

Inspection at: H. B. Robinson 2, Hartsville, South Carolina

Inspection conducted: August 7-10, 1978

Inspector: W. W. Peery

Approved by:

J. W. Hufham
J. W. Hufham, Chief
Environmental and Special Projects Section
Fuel Facility and Materials Safety Branch

9/6/78
Date

Inspection Summary

Inspection on August 7-10, 1978 (Report No. 50-261/78-20)

Areas Inspected: Radiological Environmental Monitoring Program including: Management Controls, Inspection of Environmental Monitoring Stations, Review of Licensee Audit Results, Review of Annual Environmental Report, Review of Radiological Environmental Monitoring Procedures, and Implementation of the Monitoring Program. The inspection involved 26 inspector-hours onsite by one NRC inspector.

Results: Of the six areas inspected, no items of noncompliance or deviations were identified.

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DETAILS I

Prepared by:

W. W. Peery
W. W. Peery, Radiation Specialist
Environmental and Special Projects
Section
Fuel Facility and Materials Safety
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9/11/78
Date

Dates of Inspection: August 7-10, 1978

Reviewed by:

J. W. Hufham
J. W. Hufham, Chief
Environmental and Special Projects
Section
Fuel Facility and Materials Safety
Branch

9/12/78
Date

1. Persons Contacted

- *C. W. Crawford, Acting Plant Manager
- *D. S. Crocker, Environmental and Radiation Control Supervisor
- *B. W. Garrison, Quality Assurance Supervisor
- *W. T. Ritchie, Radiation Control and Test Foreman
- *M. Page, Engineer
- J. M. Hill, Radiation Control and Test Technician I

*Denotes those present during the exit interview.

2. Licensee Action on Previous Inspection Findings

No items were inspected during this inspection.

3. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations.

Unresolved Item No. 261/78-20-01: Section 3.2.3.8 of the Robinson 2 Radiation Protection Manual states that the determination should be made that the sampler was running before leaving the station. During sample collection at three stations on August 8, 1978, the inspector observed that the technician did not see that the samplers were running before leaving the stations. The samplers are equipped with timers set for operation of the samplers about fifty percent of the time. Licensee representative stated that they

preferred not to exercise the timers to determine operability of the sampler during the off cycle. They stated that other means of testing the samplers for operability would be pursued.

4. Management Controls

- a. The licensee's Operations Manual and Administrative Instruction assigns responsibility and authority for conducting the radiological environmental monitoring program. The assignment of responsibility and authority to responsible management and supervision offer control equivalent to the previous program.
- b. Section 6.5.3.1 of the licensee's Technical Specifications requires audits under the cognizance of the Corporate Quality Assurance Audit (CQAA) Section for conformance of facility operation to all provisions in Technical Specifications at least once per year. The inspector reviewed the results of audits QAA/130-1, June 6-9, 1978; QAA/78-612, June 10-14, 1978; QAA/20-16, July 10-14, 1978, and determined that the mechanism is established for recording the results of audits with provisions for corrective action and followup and reporting the results of the audits to supervision and management. The above audits were performed at the Robinson site and the CP&L Shearon Harris Energy and Environmental Center (HEEC) where the environmental samples are analyzed. The inspector has no further questions regarding this item.

5. Quality Control of Analytical Measurements

The analysis of all radiological environmental monitoring samples from Robinson 2 are performed at HEEC. A quality control program for the analysis of the samples has been established at HEEC including internal controls, and comparative measurements between EPA, State of South Carolina and the Robinson 2 plant. Apparently, the program has been successful in meeting the minimum detectable activities (MDAs) shown in the licensee's 1977 Annual Environmental Monitoring Report as evidenced by the data presented in the report.

6. Implementation of the Environmental Monitoring Program

- a. Technical Specification 4.10-1, Table 4.10-1, provides the requirements for type and number of samples, frequency and analysis to be performed. The inspector inspected all

(7) of the air particulate and charcoal filter monitoring stations, observed collection of filters and surface water samples and inspected the majority of the TLD stations (22). The inspection of monitoring stations and review of the annual Radiological Environmental Monitoring Report for 1977 revealed that the licensee apparently has been conducting the program as required by Technical Specification 4.10-1. The inspector observed at air monitoring locations #2 and #9 that the weather covers over the sample holders were too close to the holders, such that air flow may be restricted. The inspector pointed this out to licensee representatives as well as the possibility of placing additional load on the pumps. A licensee representative informed the inspector by telephone on August 15, 1978, that the weather covers had been restored to their proper position.

- b. The licensee's procedures for the environmental monitoring program contained in the Robinson 2 Radiation Protection Manual were reviewed by the inspector and comments made to licensee representatives regarding the desirability of including more details on sampling methods and additional descriptions of the sampling locations.
- c. The inspector determined that the licensee has apparently submitted reports to the NRC as required. The inspector reviewed the licensee's annual report for 1977 for missing data, obvious mistaken, anomalous measurements and observed biases or trends in the data. The report apparently contained numerous instances of missing data and mistakes in data presented. Licensee representatives were informed of this finding. Licensee representatives indicated that discussions would be held with those responsible for finalizing the reports with the view toward improving the quality of the reports. Observed biases and trends in the program have apparently involved primarily Chinese nuclear testing which was investigated and documented. At the time of the last previous inspection (77-08) licensee representatives indicated that arrangements would be made to proceduralize a requirement for prompt notification of Robinson 2 by HEEC of anomalous results. Referenced documentation at Robinson 2 revealed that the commitment had been accomplished.

7. Exit Interview

The inspector met with licensee representatives (as shown in paragraph 1) at the conclusion of the inspection on August 10, 1978, and summarized the scope and findings of the inspection.