

REGION II
GEORGIA



Carolina Power & Light Company

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

Company Correspondence

April 14, 1979

File: NG 3513(R)

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Suite 3100 Region II
101 Marietta Street
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESPONSE TO IE INSPECTION REPORT NO. 50-261/79-05

Dear Mr. O'Reilly:

We have received and reviewed the subject report and are hereby responding to the infraction as requested.

Enforcement Item

Infraction

Technical Specification 6.3.1 requires that each member of the facility staff meet the minimum qualifications of ANSI N18.1-1971, Section 4.5.2 of ANSI N18.1 states, in part, that technicians in responsible positions shall have a minimum of two years of working experience in their specialty.

Contrary to the above, RC&T Technicians who do not have a minimum of two years working experience in the health physics specialty have routinely been assigned as the only health physics representative on shift. The RC&T Technicians on shift were in a responsible position in that they evaluated radiological hazards, specified protective controls, and approved radiation work permits.

Corrective Action

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CCP

Carolina Power and Light Company has taken the position that the Shift Foreman is the person responsible for the radiological and personal health and safety of plant personnel and the general public during backshift hours and meets the requirements of the responsible individual. This position is supported by the fact that the Shift Foreman has, by virtue of his experience

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Mr. James P. O'Reilly
Page 2
April 14, 1979
SERIAL: RSEP 79-418

and senior reactor operator training, a good, fundamental, working knowledge of proper health physics practices and procedures. In addition, he is able to draw upon the technical knowledge and expertise of the RC&T Technician on shift whenever necessary. It should also be noted that the RC&T Technician on shift is qualified to provide such technical assistance since he meets or exceeds the "Criteria for Individuals Qualified in Radiation Protection Procedures" established by the NRC in their letter from the Division of Operating Reactors, March 16, 1977, which serves to implement Technical Specification 6.2.2. Thus the Shift Foreman acting in a supervisory capacity and the RC&T Technician on shift compliment each other with the former providing several years experience and technical ability and the latter providing the skills and qualifications required by the "Criteria for Individuals Qualified in Radiation Protection Procedures". The fact that the Shift Foreman regulates all backshift activities and approves all RWP's initiated during his shift is testimony in itself that a "responsible" individual is reviewing health physics practices within the plant during the backshift hours.

Carolina Power and Light Company is not of the opinion that the health and safety of plant personnel and the general public has been or will be compromised by the conduct of operations described above. However, in order to comply with the explicit wording of the referenced standard concerning the qualifications of RC&T personnel, only those health physics technicians who meet the recommendations of ANSI N18.1-1971 will be utilized for back shift coverage.

Corrective Action to Prevent Further Noncompliance

The previously stated corrective action will be followed to prevent further noncompliance.

Date When Full Compliance Will Be Achieved

The previously stated corrective action was fully implemented on April 14, 1979.

Very truly yours,



H. R. Banks, Manager
Nuclear Generation Section