



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

SEP 12 1985

Report No.: 50-261/85-26

Licensee: Carolina Power and Light Company
 P. O. Box 1551
 Raleigh, NC 27602

Docket No.: 50-261

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection Conducted: August 28-29, 1985

Inspectors: *George O Kyo* *11 September 1985*
 G. B. Kizo Date Signed

for *George O Kyo* *11 September 1985*
 S. S. Adamovitz Date Signed

Approved by: *P. G. Stoddart* *9/11/85*
 P. G. Stoddart, Acting Section Chief Date Signed
 Emergency Preparedness and Radiological
 Protection Branch
 Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine, unannounced inspection entailed 30 inspector-hours onsite during regular hours, in the area of radiological environmental monitoring requirements.

Results: No violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *J. A. Eaddy, Supervisor, Environmental and Chemistry
- R. M. Smith, Manager, Environmental and Radiation Control
- *J. M. Curley, Manager, Technical Support (Acting Plant General Manager)
- C. Wright, Senior Specialist, Regulatory Compliance
- *J. C. Sturdavant, Technician, Regulatory Compliance
- *H. J. Young, Director, Quality Assurance
- *A. M. McCauley, Principle Engineer
- *D. C. Stadler, Director, Regulatory Compliance
- B. D. McFeaters, Meteorological Supervisor, Corporate
- B. Christenson, Foreman, Environmental and Chemistry

NRC Resident Inspectors

- *H. E. P. Krug
- H. C. Whitcomb

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on August 29, 1985, with those persons indicated in paragraph 1 above. The inspectors described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

3. Audits and Appraisals

Technical Specification 6.5.3.2.d(9) requires an audit at least once per 12 months of the Radiological Environmental Monitoring Program and the results thereof. Inspection included a detailed review of the plant operation audits during 1984 and 1985. Review of Audit Reports QAA/20-42 (1984) and QAA/XX20-85-04 (1985) disclosed that no findings were identified regarding the subject environmental monitoring program defined in Technical Specification 3.17.

Within the areas examined, no violations or deviations were identified.

4. Procedures

- a. Technical Specification 6.5.1.1 requires the establishment of written procedures and administrative policies to assure implementation of all

conditions and commitments defined in the Technical Specifications. The inspectors selectively reviewed the following procedures:

- (1) EMP-001 Environmental Sampling, Rev. 4, August 3, 1985
- (2) EMP-002 Air Flowmeters Calibration, Rev. 0, August 24, 1983
- (3) EMP-004 Operation and Calibration of the Model NRC-200 Environmental Air Sampler, Rev. 2, June 21, 1985
- (4) EMP-005 Environmental Emergency Kit Inventory, Rev. 2, February 8, 1985
- (5) AP-001 Project Organization and Responsibilities, Rev. 2, July 23, 1985
- (6) AP-030 NRC Reporting Requirements, Rev. 2, November 7, 1984.

The inspectors noted the procedures were being reviewed, updated and approved in accordance with administrative requirements.

- b. The inspectors discussed with cognizant licensee representatives the following selected details regarding the environmental sampling procedures outlined in EMP-001. (1) The inspectors noted that the air cartridge collection procedure did not indicate proper placement of the charcoal cartridge in the air sampler with respect to air flow path. The inspectors informed licensee representatives that erroneous placement of the cartridges during sampling could result in inaccurate analyses during subsequent counting. (2) In the milk sampling procedure, the type and quantity of the added preservative was not specified and (3) the procedure for broad leaf vegetation collection did not include any specific instructions as to the portion of plant to be collected. The inspectors informed licensee representatives that all sampling procedures in EMP-001 should be evaluated for improved detail. Licensee representatives acknowledged the inspectors comments and agreed to evaluate the environmental procedure.

Within the areas examined, no violations or deviations were identified.

5. Records

- a. The inspectors reviewed selected portions of the following records:

- (1) Annual Environmental Radiological Monitoring Reports for CY 1982, 1983, and 1984
- (2) H. B. Robinson Environmental Surveillance Report, January, February, March, April, and July 1983
- (3) H. B. Robinson Environmental Surveillance Report, May 1985

- (4) Annual Land-Use Census Data for 1983, 1984, and 1985
- (5) Land-Use Survey Questionnaires for the 1985 Land-Use Census
- (6) Environmental Air Sampler Calibration Records, 1983-1985
- (7) Environmental Sampling Report Data for surface water, air particulates, charcoal cartridges, deep well water and food products; January, June, 1984; January, June 1985

Within the areas examined, no violations or deviations were identified.

6. Implementation of Radiological Environmental Monitoring Program

Technical Specification 3.17 - Table 3.17-1, defines the radiological environmental monitoring program requirements. The inspectors conducted a detailed review of the radiological environmental monitoring program to verify the implementation thereof and to assess its compliance with the program commitments defined in the subject specification. The inspection included the following: (1) review and discussion of monitoring and surveillance procedures, (2) review of selected sampling and equipment calibration work sheets, (3) review of Annual Radiological Environmental Monitoring Reports for 1982, 1983, and 1984, and selected monthly reports for 1985; (4) examination of six air particulate and radioiodine monitoring stations and associated TLDs; (5) examination of co-located NRC/license TLD stations; (6) examination of a dairy farm for milk sampling; and (7) examination of two surface water samplers. The inspection disclosed that the radiological environmental monitoring program was implemented in accordance with Environmental Technical Specification requirements.

Within the areas examined, no violations or deviations were identified.

7. Implementation of the Meteorological Monitoring Program

The inspectors noted that the H. B. Robinson Meteorological Monitoring Program had been evaluated as part of the Emergency Preparedness Implementation Appraisal for the Shearon Harris facility (50-400/85-09) which verified the program met the commitments and requirements of Supplement 1 to NUREG-0737 and was in conformance with Regulatory Guide 1.97. The inspectors verified by direct observation that the meteorological monitoring instrumentation was operable and that the meteorological computer readout in the control room was functioning properly.

Within the areas examined, no violations or deviations were identified.

8. Quality Assurance Program

Environmental radiochemical analyses for the Robinson facility are performed by the Harris Energy and Environmental Center (HEEC). A detailed review of radioanalytical quality assurance and quality control programs was the subject of an inspection of the laboratory conducted as part of the Shearon

Harris radiological environmental inspection (50-400/85-17). The inspection disclosed that the HEEC quality control program is consistent with the guidance promulgated in Regulatory Guide 4.15 (Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment).

The inspectors also reviewed management controls for sample collection and equipment calibration for the H. B. Robinson radiological environmental monitoring program defined in Technical Specification 3.17. The following items were reviewed: (1) responsibility assigned to organizations and individuals assuring implementation of the monitoring program; (2) responsibility assigned for sample collection, operation and maintenance of sampling equipment and stations; and (3) periodic audit of the monitoring program. Inspection disclosed that organizational and individual responsibility for assuring program implementation was consistent with the referenced specification requirements.

Within the areas examined, no violations or deviations were identified.