



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

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JUN 26 1981

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In Reply Refer To:
RII:JRW
50-261/81-07

Carolina Power and Light Company
ATTN: Mr. J. A. Jones, Senior Executive
Vice President and Chief
Operating Officer
411 Fayetteville Street
Raleigh, NC 27602



Gentlemen:

Subject: Health Physics Appraisal

During the period of January 26 - February 6, 1981, the NRC conducted a special appraisal of the health physics program at the H. B. Robinson facility. This appraisal was performed in lieu of certain routine inspections normally conducted in the area of health physics. Areas examined during this appraisal are described in the enclosed report (50-261/81-07). Within these areas, the appraisal team reviewed selected procedures and representative records, observed work practices, and interviewed personnel. It is recommended that you carefully review the findings of this report for consideration in improving your health physics program.

The appraisal conducted at the H. B. Robinson facility was part of the NRC's general program to strengthen the health physics programs at nuclear power plants. As a first step in this effort, the Office of Inspection and Enforcement is conducting these special appraisals of the health physics programs at all operating power reactor sites. These appraisals were previously identified to you in a letter dated January 22, 1980, from Mr. Victor Stello, Jr., Director, NRC Office of Inspection and Enforcement. One of the objectives of the health physics appraisals is to evaluate the overall adequacy and effectiveness of the total health physics program at each site and to identify areas of weakness that need to be strengthened. We also intend to use the findings from these appraisals as a basis for improving NRC requirements and guidance. Consequently, our appraisal encompassed certain areas which may not be explicitly addressed by current NRC requirements. The next step that is planned in this overall effort will be the imposition of a requirement by the Office of Nuclear Reactor Regulation (NRR) that all licensees develop, submit to the NRC for approval, and implement a Radiation Protection Plan. Each licensee will be expected to include in the Radiation Protection Plan sufficient measures to provide lasting corrective action for significant weaknesses identified during the special appraisals of the current health physics programs. Guidance for the development of this plan has incorporated pertinent findings from completed special appraisals and was issued for public comment in April, 1981.

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The findings of this appraisal at the H. B. Robinson facility indicate that, although your overall health physics program is adequate for present operations, significant weaknesses exist. These include the following:

- a. the external exposure control program has not been adequately implemented in the area of personnel dosimetry during steam generator channel head entries;
- b. the personnel contamination control program has not been adequately implemented;
- c. the radiological surveillance program has not been adequately implemented; and
- d. the safety evaluation performed to determine if the operation of the contaminated auxiliary boiler was acceptable did not include an assessment of the consequences of potential release of radioactivity to the environment nor did it include a comparison of such releases with the radioactive effluent limits of 10 CFR 20 and the facility's Technical Specifications.

These items were identified to your plant management during the exit interview on February 6, 1981. They were also discussed with you by telephone on February 10, 1981, by R. C. Lewis of the Region II office. The results of this conversation and our understanding of your planned corrective actions were also discussed in a letter to you from James P. O'Reilly dated February 10, 1981.

These findings are discussed in more detail in Appendix A, "Notice of Significant Appraisal Findings". We recognize that regulatory requirements pertaining to the significant weaknesses identified in Appendix A may not currently exist. However, to assist us in determining whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement within twenty-five (25) days of your receipt of this letter describing your corrective action for the significant weaknesses identified in Appendix A, including: (1) steps which have been taken; (2) steps which will be taken; and (3) a schedule for completion of action. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations. In so far as Significant Finding A resulted in a special inspection conducted on March 2-4, 1981 and your response to the apparent violations listed in Appendix A to our letter of May 12, 1981 addresses the inadequacies in your external exposure control program during steam generator work, you are not required to respond to Significant Finding A herewith.

During the inspection, it was found that certain activities under your license appear to violate NRC requirements. These items and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix B. A written response is required. Elements to be included in your response are delineated in Appendix B.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed report will be placed in the NRC's Public Document Room. If the report contains any information that you believe to be exempt from

JUN 26 1981

Carolina Power and Light Company

3

disclosure under 10 CFR 9.5(a)(4), it is necessary that you: (a) notify this office by telephone within ten days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with section 2.790(b)(1), such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part thereof sought to be withheld, and a full statement of the reasons on the basis of which it is claimed that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,


James P. O'Reilly
Director

Enclosures:

1. Appendix A, Notice of Significant Appraisal Findings
2. Appendix B, Notice of Violation
3. Inspection Report No. 50-261/81-07

cc w/encl:

R. B. Starkey, Plant Manager

APPENDIX A

NOTICE OF SIGNIFICANT APPRAISAL FINDINGS

Carolina Power and Light Company
H. B. Robinson 2

Docket No. 50-261
License No. DPR-23

Based on the Health Physics Appraisal conducted on January 26 - February 6, 1981, the following items appear to require corrective actions: (Section references are to the Details portion of the enclosed Inspection Report)

- A. The external exposure control program was deficient in the area of personnel dosimetry during steam generator channel head entries. Survey data indicated that non-uniform and complex radiation fields existed in both hot and cold leg sections of each steam generator. Personnel radiation monitoring consisted of chest worn self-reading and thermoluminescent dosimeters. Based on available information, it was evident that workers were receiving a significantly greater whole body dose to the head or gonads than previously recorded by dosimetry worn on their chest (Section 8.g).
- B. The personnel contamination control program was deficient. The appraisal found: (1) improper training of workers in the removal of protective clothing, (2) inadequate number and location of personnel friskers in the auxiliary building, (3) inadequate attention to and control of protective clothing to ensure that defective anticontamination clothing is not provided to workers, and (4) insufficient management attention and corrective actions taken in response to excessive personnel contamination instances (Sections 5.b, 8.a-b and 11.a).
- C. The radiological surveillance program was deficient. The appraisal found: (1) the scope of radiation, contamination and airborne radioactivity surveys was not adequate to determine the general radiological status of the plant, (2) specific radiological surveys for radiation work permits written to support specific work activities were not being conducted, and (3) a detailed radiation survey of the secondary plant had not been performed even though primary to secondary leaks had occurred nor had a program been established to ensure that areas outside the radiation control area are routinely surveyed (Sections 8.c-e).
- D. The safety evaluation performed to determine if the operation of the contaminated auxiliary boiler was acceptable (i.e., does not involve an unreviewed safety question or a change to Technical Specifications) did not include the following elements specified by IE Bulletin 80-10: (1) an assessment of potential releases of radioactivity to the environment, or (2) comparison of such releases with the radioactive effluent limits of 10 CFR 20 and the facility's Technical Specifications (Section 10.c).