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

DEC 30 1991

Report No: 50-261/91-25

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 Nuclear Power Plant

Inspection Conducted: November 18 - 22, 1991

Inspector: R. P. Carrion 23 Dec '91
R. P. Carrion Date Signed

Approved by: T R Decker 12/23/91
T. R. Decker, Chief Date Signed
Radiological Effluents and Chemistry
Section
Radiological Protection and Emergency
Preparedness Branch
Division of Radiation Safety and Safeguards

SUMMARY

Scope:

This routine, unannounced inspection was conducted in the areas of radiological effluent releases (as documented by semi-annual effluent reports and the annual radiological environmental monitoring report), plant water chemistry, the post accident sampling systems (PASS), shipping of spent fuel, environmental monitoring, organization of the Environmental and Radiation Control (E&RC) Unit and the Radwaste Unit, and radwaste facilities.

Results:

The Chemistry/Effluents Department and Radioactive Waste Group were staffed by a competent staff and has been stable (Paragraph 2).

The licensee had established a good Count Room radiochemical analysis program (Paragraph 3).

Plant water chemistry was maintained well within TS limits (Paragraph 4).

The Post Accident Sampling System (PASS) was well-maintained and operable. However, only four technicians were fully qualified to operate the system (Paragraph 5).

Plant operations had no significant radiological/environmental impact on public health and safety in 1990 (Paragraph 6).

Licensee radwaste facilities were well-maintained and operated by a competent staff. The Radwaste staff involved with the spent fuel shipments is competent and carries out its duties in a dedicated, professional manner. However, Non-Cited Violation (NCV) 91-25-01 was identified. (Paragraph 7).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*S. A. Billings, Technical Aide, Regulatory Compliance
*R. H. Chambers, Plant General Manager
*W. A. Christensen, Chemistry Supervisor, Environmental and Radiation Control (E&RC)
M. D. Crabtree, Radwaste Supervisor, E&RC
*R. D. Crook, Senior Specialist, Regulatory Compliance
*C. R. Dietz, Vice President, Robinson Nuclear Power Division
J. A. Eaddy, Supervisor, E&RC Technical Support
*R. R. Hitch, Senior Specialist, E&RC Support
M. Millinor, Senior Specialist, E&RC Support
A. Padgett, Manager, E&RC
A. L. Taylor, Environmental and Chemistry Technician I

Other licensee employees contacted during this inspection included engineers, operators, technicians, and administrative personnel.

NRC Inspectors

*L. Garner, Senior Resident Inspector
K. Jury, Resident Inspector

*Attended exit interview

2. Organization (84750)

Technical Specification 6.2 describes the licensee's organization.

The inspector reviewed the licensee's organization, staffing levels, and lines of authority as they related to the Chemistry/Effluents Department and Radioactive Waste Group to verify that the licensee had not made organizational changes which would adversely affect the ability to control radiation exposures or radioactive material.

The organization was stable, with limited turnover. Overtime was used sparingly during normal work scenarios but was expected to be used more heavily during the upcoming outage.

The Environmental and Radiation Control (E&RC) Unit consisted of 60 people and was divided into five functional areas: Chemistry/Effluents, two groups for Job Coverage, Radwaste, and Technical Support.

The Radwaste Unit was composed of seven technicians and a supervisor, who reported to the E&RC Manager, who, in turn, reported to the Plant General Manager. The supervisor had assumed his position in the spring after two years of working in the Job Coverage Group. Previous to that assignment, he had worked in the Radwaste Group and, therefore, was knowledgeable in its operation. In addition to preparing the normal radwaste shipments, this group was also responsible for receiving the empty spent fuel casks from the Harris plant and assuring that they may be released from the Robinson site upon loading of the spent fuel, prior to transport to Harris.

The use of overtime is addressed in TS 6.2.3.a. The inspector discussed this issue with the E&RC Manager, who provided the inspector with a copy of the overtime log for his unit. It included the cumulative number of overtime hours worked since the beginning of the year. The inspector reviewed the log and found that the TS requirements were met.

The inspector concluded that the organization and staffing levels were satisfactory and met TS requirements.

No violations or deviations were identified.

3. Count Room (84750)

10 CFR 20.201(b) requires the licensee to perform surveys as necessary to evaluate the extent of radiation hazards. The inspector toured the Chemistry Count Room, which was equipped with two Nuclear Data computer-based gamma spectroscopy counting systems with three operational intrinsic Germanium detectors, two Tennelec LB1000 Proportional Counters used for gross alpha and gross beta determinations, and a new Packard Tri-Carb 1900 TR Liquid Scintillation Counting System used for tritium (H-3) determination. Procedures were being developed for the new liquid scintillation system and until they could be approved, the previous system, a Packard 460 Liquid Scintillation System, was being utilized. It had been moved out of the Count Room to another part of the lab and would be used as a backup once the new system was on line.

The inspector reviewed control charts and calibration curves and found them to be current and sufficient. Daily calibration checks and system resolution checks were performed on the gamma spectroscopy system (three detectors) using a mixed gamma source composed of Am-241, Co-60, and Cs-137. The values obtained from the calibration checks were recorded and trended on control charts with specified predetermined limits in order to confirm detector

stabilities and system operability. Detector 1 had been recalibrated on November 11, 1991 due to being biased low for Am-241 and biased high for Cs-137; Detector 2 had been recalibrated on September 30, 1991 due to being biased low for Am-241 and biased high for Cs-137; and Detector 3 had been recalibrated on November 11, 1991 due to being biased high for Am-241. The licensee indicated that daily background determinations were performed for each detector, also.

It had not been necessary to recalibrate the two proportional counters since mid-March, indicating that the performance of the detectors had been stable. Daily background and response checks were performed on the proportional counters and recorded in a monthly log, which was reviewed by the inspector and determined to be acceptable.

The Packard 460 liquid scintillation counter was last recalibrated on August 14, 1991. Daily background checks were also performed on this counter.

The licensee takes part in a radiochemistry cross check program with an outside vendor. The inspector reviewed the results for the first, second, and third quarters of this year and found agreement for all radionuclides of each detector doing the analysis for each quarter.

The inspector reviewed selected portions of Chemistry Procedure CP-003, Rev. 11, entitled "Systems Sampling Procedure," with an effective date of May 11, 1991 and concluded that they were adequate for their intended purpose. The inspector observed a technician obtain a daily reactor coolant sample for routine analysis. The technician reviewed the sampling procedure before leaving the lab and prepared his work area in the lab to do the analysis expeditiously upon his return with the sample. The technician made the valve lineups and purged the lines and sample container as prescribed by the procedure in a competent, professional manner. Proper sampling techniques and health physics practices were utilized. Upon completion of taking the sample, he returned the system lineup to its original status and quickly returned to the lab to begin the analysis.

From the observations made during this inspection, the inspector concluded that the licensee demonstrated that a good Count Room radiochemical analysis program was in place.

No violations or deviations were identified.

4. Plant Water Chemistry (84750)

TS 3.1.6 specifies the limits within which the reactor coolant system must be maintained for dissolved oxygen (DO) and chloride. TS 3.1.4 specifies the limits for the specific activity of the reactor coolant. Table 4.1-2 of TS 4.1 specifies the sampling frequencies for these parameters. These parameters are related to corrosion resistance and fuel integrity.

Pursuant to the TS requirements, the inspector reviewed graphical summaries which correlated reactor power output to chloride and dissolved oxygen concentrations, as well as specific activity and dose equivalent iodine of the reactor coolant for the period of September 1, 1991 through October 31, 1991. All of the reviewed parameters satisfied the TS requirements.

The inspector concluded that the plant water chemistry was adequately managed.

No violations or deviations were identified.

5. Post Accident Sampling System (PASS)

NUREG-0737 requires that the licensee be able to obtain a sample of the reactor coolant and containment atmosphere. Furthermore, the sample must be promptly obtained and analyzed (within three hours total) under accident conditions without incurring a radiation exposure to any individual in excess of 3 and 18 3/4 rem to the whole body or extremities, respectively.

Discussions with cognizant licensee personnel identified four technicians who were trained and fully qualified to operate the PASS. Further discussion determined that the system itself was required to be fully exercised once per six months, utilizing all seven PASS procedures, CP-080 through CP-086, including actually taking a sample. However, a monthly "check and flush" utilizing three of the seven PASS operation procedures, CP-080, CP-081, and CP-083, was performed to assure operability. No sample was taken during the monthly exercise. PASS technicians were required to be requalified every two years. The inspectors discussed the two-year requalification period as well as the small number of fully qualified technicians with the Chemistry/Effluents Supervisor and a member of his technical staff. The inspector was told that although technically only four technicians were currently fully qualified according to their "qual cards," four additional technicians had recently been "de-qualified," i.e. had their qualifications removed, because they did not feel

comfortable executing the various PASS procedures, due to their infrequent operation of the complicated system. However, the licensee contended that these technicians could be utilized to obtain a sample, if necessary. Furthermore, the supervisor stated that various members of the technical staff were extremely familiar with the system and could also be called upon to obtain a sample. To expand the "effective" pool of qualified technicians, the supervisor planned to explore various possibilities, including a "two-tiered" qualification in which one level would be able to take samples and do normal operations and a higher level which could trouble-shoot and maintain the system as well as do the normal operations.

The inspector concluded that although the system itself was well-maintained and operable, the limited number of fully qualified technicians could potentially present problems.

No violations or deviations were identified.

6. Radiological Effluents (84750)

a. Semiannual Radioactive Effluent Release Reports

TS 6.9.d requires the licensee to submit a Semiannual Radiological Effluent Release Report within the time periods specified covering the operation of the facility during the previous six months of operation. The TS also states the requirements for the content and format of the report. The inspector reviewed the reports for the first half of 1991 and compared the results to those of 1989 and 1990 to verify compliance and to determine trends which might have occurred in liquid and gaseous effluent releases. These data are summarized below.

Robinson Radioactive Effluent Release Summary

	1989	1990	first half 1991
Abnormal Releases	0	0	0
Activity Released (curies)			
a. Liquid			
1. Fission and Activation Products	2.81E-1	3.60E-1	1.23E-1
2. Tritium	1.63E+2	3.53E+2	2.01E+1
3. Gross Alpha	<LLD	0.00E+0	0.00E+0

b. Gaseous

1. Fission and Activation Gases	2.78E+1	7.21E+0	1.58E+0
2. Iodines	3.17E-6	1.09E-7	0.00E+0
3. Particulates	1.38E-4	1.34E-4	5.38E-5
4. Tritium	4.18E+0	4.44E+0	2.07E+0

Dose Estimates (mrem)

1. Gaseous Effluents			
Whole Body	3.49E-2	4.16E-2	*
Skin	5.73E-2	5.11E-2	*
2. Liquid Effluents			
Liver	4.68E-2	1.30E-2	*

*This information will be part of the data for the second half of 1991.

No abnormal releases were reported in 1991 through the date of this inspection.

A comparison of data from liquid fission and activation products, tritium, and gross alpha, as well as gaseous particles and tritium data for 1989, 1990, and the first half of 1991 showed no significant trends. Gaseous fission and activation products and iodine showed decreasing trends.

There were no changes to the Land Use Census, the Process Control Program (PCP), or the Radioactive Waste Systems in 1991 through the date of this inspection.

However, five changes to the Offsite Dose Calculation Manual (ODCM) have been made and include:

- Nomenclature change for all radiation monitors from RMS-# to simply R-# (i.e. from RMS-15 to R-15).

- Replacing Steam Generator Monitor R-19, which previously monitored all three steam generators, with three monitors (R-19A, R-19B, R-19C), one for each respective generator. Note: the R-19 monitor was replaced via Plant Modification 898.

- Replacing monitors R-14, R-34, R-35, and R-36 with R-14A, R-14B, R-14C, R-14D, and R-14E using isokinetic sampling. The isolation function of R-15 was changed from venting to atmosphere to diverting the flow to the plant vent stack, to

allow for continuous venting. (Note: This action required a TS change.) Also, the setpoint methodology for R-15 was removed from the ODCM and is controlled by approved plant procedures. R-14A (a particulate monitor) replaced the R-34 beta channel and R-14B replaced the R-34 iodine channel. Note that these changes were made via Plant Modification 1005.

- Clarifying the annual average relative dilution factors (X/q) of the four types of releases at Robinson with reference to the vents to which they may apply.

- Including the setpoint methodology for the iodine and particulate monitors of R-22 and R-23.

b. Radiological Environmental Surveillance Program

The purpose of the Radiological Environmental Surveillance Program is to measure accumulation of radioactivity in the environment, to determine whether this radioactivity is the result of operations at the plant, and to asses the potential dose to the off-site populations bases on the cumulative measurements of any plant-originated radioactivity via the monitoring of specific elements of exposure pathways.

TS 6.9.1.e requires that the Annual Radiological Environmental Operating Report be submitted prior to May 1 of the following year of the Report. TS 6.9.1.e also states format and content requirements for the Report.

The inspector reviewed the Report for calendar year 1990 to verify compliance with the TSs. The Report had been submitted in compliance with TS 6.9.1.e on April 18, 1991, and the format and contents were as prescribed by the TS. The inspector determined that the Report was in compliance with the TSs.

Over 1150 samples were collected and analyzed during the year. Detectable radioactivity attributable to plant activities was identified in 35 measurements. All detectable radionuclides in the environmental samples were less than reportable levels, as defined in the TSs. Modeling estimates based on those measurements indicated that any dose to a member of the public due to 1990 plant operations was less than one millirem. Specifically, the report noted the following:

1) Air Sampling

422 air samples were collected throughout 1990, 369 from indicator stations and 53 from control stations, with the following results:

- In all cases, iodine-131 activities were less than LLD.

- The mean gross beta activity was only somewhat higher for the indicator stations vs. the control stations (1.88E-2 vs. 1.57E-2 picocuries per cubic meter) and less than the preoperational data of 1.4E-1 picocuries per cubic meter. The lower 1990 values were attributed to a reduction of worldwide fallout which occurred during the preoperational years. No discernable impact from plant operations was apparent from the data.

- Quarterly composite gamma analyses for air particulate samples revealed no radionuclides typical of plant effluents.

2) Broadleaf Vegetation

One control and two indicator stations were utilized for sampling broadleaf vegetation. 28 of 30 samples taken from the indicator sites had detectable concentrations of Cs-137 with an average of 1.29E-1 pCi/g, while the samples taken from the control site had detectable concentrations of 2.30E-1 pCi/g. From these results, it was concluded that the indicator values were consistent with those of the control station and were not indicative of plant effluents.

3) Fish

Samples of free-swimmer and bottom-feeding fish were collected from Lake Robinson and Prestwood Lake (the first downstream lake) and compared to similar fish samples from a control lake unaffected by plant operations. Of eight indicator fish samples collected, one indicated a detectable concentration Cs-134. Cs-137 was detected in both bottom-feeders and free-swimmers at concentrations similar to the concentrations of Cs-137 found in the control samples.

4) Groundwater

Groundwater sampling indicated that only one of thirty six samples contained a detectable concentration of tritium (and a degree of uncertainty existed in this case because its value occurred near the LLD).

5) Milk

Three of twenty-seven samples from the control milk station indicated measurable concentrations of Cs-137 while none of the indicator stations did, a further indication of Cs-137 presence in the environment resulting from worldwide fallout rather than plant operations.

6) Shoreline Sediment

No radionuclides of plant origin were detected in the shoreline sediment.

7) Bottom Sediment

Samples of bottom sediment were collected from Lake Robinson and Prestwood Lake. Radionuclides detected and their concentrations included: Sb-125, Co-60, and Cs-137 at 0.79 pCi/g, 1.34 pCi/g and 0.61 pCi/g, respectively.

8) Aquatic Vegetation

Samples of aquatic vegetation contained Mn-54, Co-58, Co-60, Cs-137, Ag-110m, and Cd-109 detected at concentrations ranging between 1 to 20 times their respective LLDs.

9) Surface Water

Samples of surface water of Lake Robinson indicated a presence of tritium which was considered to be related to plant operations.

10) Direct Radiation

Direct radiation exposure in the plant environs was measured by the placement of TLDs around the plant forming inner and outer concentric circles. The TLDs were Panasonic UD-814 badges which contain three calcium sulfate phosphors. The expectation was that if plant effect existed, the inner circle dose measurements would exceed those

of the outer circle. This condition was not observed.

The inspector toured four of the air sampling stations (Station Nos. 2,3,5,and 6), a surface water sampling station (Station No. 40), and two TLD stations (Station Nos. 20 and 26) to check their physical condition and operability. All of the air sampling stations were located in areas free of tall weeds/vegetation which might interfere with the taking of a representative sample. A TLD was also placed at each of the air sampling stations. The inspector noted that the air sampling units were due for calibration the day following the tour. The licensee's cognizant technician who accompanied the inspector said that the calibrations would be performed in the near future, within the 25% grace period granted by TS 4.0. The water sampling station was well-maintained and operable. TLD Station No. 20 was an electric utility pole to which a licensee's TLD and an NRC TLD (No. 1001506) were attached. TLD Station No. 26 was an electric utility pole to which four TLDs were attached; a licensee's indicator TLD and control TLD, an NRC TLD (No. 1501), and a State of South Carolina TLD (No. 294). The inspector noted that all TLDs were properly located and that there was no evidence of vandalism.

The Radiochemistry Laboratory at the Harris Energy and Environmental Center in New Hill, North Carolina, provided radioanalytical services for CP&L's nuclear plant radiological environmental surveillance programs. The laboratory is a participant in the EPA cross-check program and used its performance in the program as a major determinant for the accuracy and precision of its own analytical results. During 1990, a comparison of the laboratory's reported values with those of the EPA's known activity found 97% to be within three standard deviations.

The inspector concluded that the licensee had good programs in place to monitor releases of radiological effluents. Plant operations caused minimum impact to the environment and virtually no dose to the general public.

No violations or deviations were identified.

7. Transportation (86750)

10 CFR 71.5(a) requires each licensee who transfers licensed material outside of the confines of its plant or other place of use, or who delivers licensed material to a carrier for

transport, shall comply with the applicable requirements of the regulations appropriate to the mode of transport of DOT in 49 CFR Parts 170 through 189.

Pursuant to these requirements, the inspector reviewed the licensee's activities affiliated with these requirements, to determine whether the licensee effectively processes, packages, stores, and ships radioactive solid materials. The licensee's program for the packaging and transportation of radioactive materials was conducted by the Radioactive Waste Group within the E&RC Unit. Radwaste was processed and packaged (including the preparation of shipping documentation) by the Radwaste Group.

a. Facility Familiarization

The Radioactive Waste Supervisor showed the inspector through his facilities and explained how various operations (compaction of Dry Active Waste (DAW), dewatering of spent bead resins, etc.) were conducted. DAW was collected in bags and barrels throughout the plant and compacted once or twice each week, as required. The licensee had the capacity to store DAW for a five-year period. Storage capacity was composed of a spent resin storage tank, four bunkers in the Radwaste Building, and four at-core shields. The licensee had a Volume Reduction Program to reduce radioactive waste generated for burial. The inspector reviewed records illustrating a steady reduction in the volume over the last several years to the point that an approximately constant volume averaging slightly less than 3000 cubic feet was shipped annually.

b. Radwaste Shipments

Shipment of radioactive materials was the responsibility of the Radioactive Waste Group, which prepared all shipping documents and procured the necessary disposal containers and shipping casks. To date in 1991, eight radwaste shipments have been made off site, including five DAW, one steel liner of hot trash, one HIC containing spent dewatered resin, and one shipment of guide tubes. This included shipments to SEG for supercompaction/incineration before final disposal, but not rail shipments of spent fuel to Harris. The inspector reviewed the three shipping packages for radwaste burial shipments for 1991. They included Radwaste Shipment Nos. 27/C-91-1 and 39/C-91-2. The packages thoroughly documented the shipments and included items such as unique shipment and shipping container numbers, waste content and volume, total

activity, analytical summary and breakdown of isotopes with a half-life greater than five years, etc. The radiation and contamination survey results were within the limits specified and the shipping documents were being maintained as required. No over-the-road shipments were made during the period that the inspector was onsite and, therefore, no observation of the actual activities involved therein could be made to evaluate the effectiveness of training, activities of personnel, etc.

The licensee expected to make two additional shipments of dewatered resin in HICs by the end of the year.

c. The inspector observed the shipment (Shipment No. S-91-50) of two spent fuel casks off site and their pick up by the CSX Railroad for transport to the Harris site. Before being picked up by CSX, the inspector and the responsible RC technician boarded both cars containing the spent fuel casks to verify radiation levels as shown on the survey sheet, to check the condition of the packaging, and to check the locks and seals of the cask cage. These items were found to be acceptable for both shipments. The inspector accompanied the RC technician when he delivered the shipment documentation, including emergency response information, Engineer/Conductor Instructions for Exclusive Use Transport Vehicles, Bill of Lading, etc., to the engineer of the locomotive, who was briefed on the contents of the shipment and his responsibilities, with emphasis on who to contact in the event of an emergency.

d. Discussion of Information Notice (IN) 90-82

The inspector discussed IN 90-82, entitled "Requirements For Use Of Nuclear Regulatory Commission-Approved Transport Packages For Shipment Of Type A Quantities Of Radioactive Material," with the Radioactive Waste Supervisor to be sure that he and his staff were cognizant of it and its implications. The inspector was assured that the licensee was familiar with it.

e. Non-Cited Violation (NCV) 50-261/91-25-01, Failure of Package to Meet Shipping Requirements

On July 26, 1991, a package containing material of Low Specific Activity (LSA), a Spent Fuel Cask redundant yoke, was sent from the Robinson site to the Brunswick site. Upon receipt the following day, the bottom front of the wooden package was discovered to be pushed out

three to five inches, thereby violating the "strong, tight package" requirements of 49 CFR 173.425(b)(1). The Radiation Control Supervisor responsible for the radioactive shipping at Robinson was notified by his counterpart at Brunswick that the shipment had arrived out of compliance with applicable shipping regulations. Notification and reporting requirements of 49 CFR 173.425, 10 CFR 20.403, 10 CFR 20.405, 10 CFR 50.72, and 10 CFR 50.73 were reviewed for applicability and it was determined that none applied to this incident. Nevertheless, the Resident Inspectors at the respective sites were notified. The licensee initiated Adverse Condition Report (ACR) 91-269 to review the event and take appropriate corrective actions to prevent recurrence. Factors and causes noted in the report included items such as overconfidence, pressure to complete the task, less than timely communication of the original work request, inadequate written procedures, inadequately qualified technicians, and lack of supervision. Corrective actions identified to be taken included revising written procedures to include sign-offs of critical steps of the packaging process, documentation of supervisory oversight for non-routine/infrequent packaging and shipping of radioactive material, and documented specific training for personnel on how and when to block, brace, and shore radioactive material packaged for shipping.

A one-hour training session on bracing was held on November 5, 1991 for personnel normally involved with shipping activities. Packaging and shipping procedures were being revised to include sign-offs for critical points of the work and the licensee expected to have them completed by the end of the year (1991).

The inspector concluded that generally the Radwaste Group was staffed by competent personnel who effectively implemented the program. However, one Non-Cited Violation was identified, NCV 50-261/91-25-01, Failure of Package to Meet Shipping Requirements.

8. Exit Interview

The inspection scope and results were summarized on November 22, 1991, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed the inspection results, including likely informational content of the inspection report with regard to documents and/or processes reviewed during the

inspection. The licensee did not identify any such documents or processes as proprietary. Dissenting comments were not received from the licensee.

9. Acronyms and Initialisms

ACR - Adverse Condition Report
CFR - Code of Federal Regulations
Ci - curie
CFR - Code of Federal Regulations
CP - Chemistry Procedure
CP&L - Carolina Power and Light
CSX - CSX Corporation
DO - Dissolved Oxygen
DOT - Department of Transportation
E&RC - Environmental and Radiation Control
g - gram
HIC - High Integrity Container
IN - Information Notice
LLD - Lower Limit of Detection
LSA - Low Specific Activity
NCV - Non-Cited Violation
No. - Number
NRC - Nuclear Regulatory Commission
NRR - Nuclear Reactor Regulation
ODCM - Off-site Dose Calculation Manual
PASS - Post Accident Sampling System
pCi - pico-Curie (1.0E-12 Ci)
PCP - Process Control Program
RC - Radiation Control
SEG - Scientific Ecology Group
TLD - Thermoluminescent Dosimetry
TS - Technical Specification
uCi - micro-Curie (1.0E-6 Ci)

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RII:DRSS	RII:DRSS	RII:DRP
RPC		
RCarrion	TDecker	HChristensen
12/20/91	12/1/91	/23/91

Official

DEC 30 1991

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

Carolina Power and Light Company
ATTN: Mr. Lynn W. Eury
Executive Vice President
Power Supply
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Raleigh, NC 27602

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-261/91-25

This refers to the inspection conducted by R. P. Carrion of this office on November 18-22, 1991. The inspection included a review of activities authorized for your H. B. Robinson facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

The enclosed Inspection Report identifies activities that appeared to violate NRC requirements that are not cited; therefore, a response is not required.

We are concerned about this because of failure of the package to meet shipping requirements.

In accordance with 10 CFR 2.790(a), a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely,

/s/

William E. Cline, Chief
Radiological Protection and
Emergency Preparedness Branch
Division of Radiation Safety
and Safeguards

Enclosure:
NRC Inspection Report

cc w/encl: (Cont'd on page 2)

IE01