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SUBJECT: Responds to violations noted in Insp Rept 50-261/92-17.  
 Corrective actions: health physics procedures & general  
 employee training provided re frisking requirements after  
 exiting contamination areas.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
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NRC INSPECTION REPORT NO. 50-261/92-17 REPLY TO A NOTICE OF VIOLATION


Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in Inspection Report 50-261/92-17.

Enclosure 1 provides for each violation a description of the occurrence, the causal factors and root causes identified for the violation, and a discussion of the corrective actions taken and planned for the occurrence. With regard to the first violation, our response discusses additional actions planned to improve the effectiveness of the Health Physics Training program.

Should you have any questions regarding this matter, please contact Mr. J. L. Harrison at (803) 383-1433.

Very truly yours,

  
Charles R. Dietz  
Vice President

Robinson Nuclear Project Department

RDC:sgk

Enclosure

cc: Mr. S. D. Ebnetter  
Mr. L. W. Garner  
INPO

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REPLY TO NOTICE OF VIOLATION

Severity Level IV Violation ( RII-92-17-01)

TS 6.5.1.1.1 requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Revision 2, February 1978 in Section 7.e.1 recommends that procedures be written covering access controls to radiation areas including a Radiation Work Permit (RWP) System.

Plant Program Procedure (PLP-016), Radiation Work Permit Program, Revision 11, dated March 26, 1992, requires that all work performed in the radiologically controlled area (RCA) will be performed under a RWP and that it is the user's responsibility to perform his specific task under the appropriate RWP.

Health Physics Procedure (HPP-112), Use of HEPA Filtration Units and HEPA Vacuum Cleaners, Revision 3, dated July 2, 1991, requires that 1) personnel involved in HEPA filtration unit and vacuum cleaner emptying or filter changes will be briefed in the procedural and radiological requirements of the task; 2) activities will be performed under strict radiological controls with restrictions established in a special RWP; 3) all activities performed while a vacuum cleaner head/body seal is broken will take place in a room, containment, or tent established to control the spread of airborne radioactivity; and 4) any room, containment, or tent as described above will be equipped with a HEPA filter.

Contrary to the above, on June 2, 1992, the licensee failed to follow procedures associated with a contaminated HEPA filter change in that the individual performing the task was not on the appropriate RWP, was not briefed in the procedural and radiological requirements of the task, activities were not performed under strict radiological controls, activities were performed in a tent lacking integrity to control the spread of contamination, and the tent was not equipped with a HEPA filter.

REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred. The violation was caused by failure to follow established procedures associated with the use of HEPA filtration units and vacuum cleaners.

2. The Corrective Steps That Have Been Taken and the Results Achieved

Adverse Condition Report (ACR) 92-182 was issued to address the stated violation, and the individuals involved with the event were counselled. Radiation Work Permit 92-0826 was revised on June 5, 1992 to specifically state that a HEPA Unit will be utilized when HEPA filters or vacuum cleaners are being changed out in any room, tent, or containment. Appropriate Health Physics personnel, including Deconners, were trained on the event during the week of June 5, 1992. The above actions addressed the stated violation.

3. The Corrective Steps That Will Be Taken to Avoid Further Violations

ACR 92-182 is currently under evaluation, and additional corrective actions are being considered. In order to address concerns regarding the effectiveness of the Contractor Training Program, Plant Procedure HPP-112, "Use of HEPA Filtration Units and HEPA Vacuum Cleaners", will be included in the training and qualification program for transient health physics personnel.

4. The Date When Full Compliance Will Be Achieved

Full compliance for the violation was achieved with the actions stated in item 2 above.

Severity Level IV Violation ( RII-92-17-02)

TS 6.5.1.1.1 requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Revision 2, February 1978 in Section 7.e.4 recommends that procedures be written covering contamination controls.

PLP-031, Contamination Monitoring Program for Personnel/Personal Effects, Revision 5, dated January 1, 1991 requires that workers perform a whole body frisk at the nearest frisking station immediately upon exiting a high contamination area.

Contrary to the above, on June 1, 1992, the licensee failed to follow procedures for personnel monitoring in that three workers failed to perform a whole body frisk at the nearest frisking station upon exiting the Spent Fuel Pool, a posted high contamination area.

REPLY

1. The Reason for the Violation

CP&L acknowledges the violation. The violation occurred due to failure of the involved individuals to follow established Health Physics procedures and General Employee Training.

2. The Corrective Steps That Have Been Taken and the Results Achieved

Upon identification of the violation, Adverse Condition Report 92-192 was initiated to determine the cause of the violation and to formulate corrective actions. The individuals involved in the violation were counselled by their supervision. Also, the Radiation Control Supervisor discussed the frisking requirements after exiting Contamination Areas with the involved individuals. The proper frisking techniques described in procedure PLP-031, "Contamination Monitoring Program for Personnel/Personal Effects", were discussed at outage planning meetings with plant supervision. General Employee Training and General Employee Retraining is placing additional emphasis on the importance of proper frisking upon exiting Contaminated Areas and High Contaminated Areas. These actions serve to correct the violation that occurred.

3. The Corrective Steps That Will Be Taken to Avoid Further Violations

ACR 92-192 is currently under evaluation, and additional corrective actions are under consideration. As such, any resulting enhancements applicable to the frisking process will be implemented as corrective actions for this violation.

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the actions stated in item 2 above.