



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

MAY 19 1993

Report No: 50-261/93-08

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: April 19 - 23, 1993

Inspector: Thomas R. Wickes, Jr. 5/18/93  
R. P. Carrion, Radiation Specialist Date Signed

Approved by: Thomas R. Wickes 5/18/93  
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, announced inspection was conducted in the areas of the organization of the Chemistry/Effluent Department and Radioactive Waste Group, audits, process and effluent radiation monitors, plant water chemistry, the Post Accident Sampling System (PASS), the Semiannual Radiological Effluent Release Report, radioactive material processing and transportation, and records for decommissioning planning.

Results:

The licensee's organization of its Chemistry/Effluent Department and radioactive material processing and shipping unit satisfied Technical Specification (TS) requirements (Paragraph 2).

The licensee's audit process was capable of identifying programmatic weaknesses and making recommendations for corrective action (Paragraph 3).

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

The licensee's program for liquid and gaseous processing and monitoring was being successfully implemented (Paragraph 5).

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The licensee's program for liquid and gaseous processing and monitoring was being successfully implemented. (Paragraph 5)

The licensee had made significant progress in expanding the number of qualified technicians to operate the PASS. (Paragraph 6)

The licensee's Semiannual Radioactive Effluent Release Report was complete and satisfied regulatory requirements. (Paragraph 7)

Radioactive material processing and shipping was conducted in a competent, professional manner. (Paragraph 8)

The licensee had developed a system to identify and maintain events/incidents significant with respect to decommissioning planning. (Paragraph 9)

## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*R. Barnett, Manager, Outage and Modifications
- \*D. Baur, Regulatory Compliance
- W. Christensen, Chemistry Supervisor, Environmental and Radiation Control (E&RC)
- \*M. D. Crabtree, Radwaste Supervisor, E&RC
- \*C. R. Dietz, Vice President, Robinson Nuclear Power Division
- \*J. A. Eaddy, Supervisor, E&RC Technical Support
- \*W. J. Flanagan, Jr., Acting General Manager
- \*J. L. Harrison, Manager, Regulatory Compliance
- \*J. Henderson, Principle Specialist, E&RC/NAD
- \*R. R. Hitch, E&RC Support
- \*D. Makosky, Specialist, System Engineering
- \*J. A. Padgett, Manager, E&RC
- R. M. Slone, Records Management Supervisor

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

#### Nuclear Regulatory Commission

- \*L. W. Garner, Senior Resident Inspector
- C. R. Ogle, Resident Inspector

\*Attended exit interview

Acronyms and Initialisms used throughout this report are listed in the last paragraph.

### 2. Organization (84750 and 86750)

Technical Specification (TS) 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 since the last inspection which would adversely affect the control of radiation exposures and/or radioactive material.

The Environmental and Radiation Control (E&RC) Unit consisted of the same number of positions (sixty) as during the last inspection (93-01), conducted in January. It was still organized into six functional areas: Chemistry/Effluents, Radioactive Waste, Technical Support, and three groups for Job Coverage.

The Chemistry/Effluents Unit and the Radioactive Waste Unit had not experienced any changes at all since the previous inspection.

Therefore, the inspector concluded that the licensee's E&RC organization continued to satisfy TS requirements.

No violations or deviations were identified.

3. Audits (84750 and 86750)

TS 6.5.3.2 specifies the types and frequencies of audits to be conducted under the direction of the Nuclear Assessment Department (NAD). In order to evaluate compliance with the TSs and assess quality of the licensee's audit programs, the inspector reviewed an Assessment Report (R-ERC-93-01) of an assessment of the E&RC Unit conducted January 11-15, 1993 by NAD. The assessment was effected through performance-based, real-time observations; technical reviews; and interviews with plant personnel. Data was collected under operating plant conditions involving work on the day shift. The data/observations were categorized by functional area with a short description. The assessment included audits of several specified areas, including the E&RC Organization, Radiological Environmental Monitoring Program (REMP), Offsite Dose Calculation Manual (ODCM), Process Control Program (PCP), and radwaste handling, packaging, and transport, and was found to be well-planned and documented, with a clearly-defined scope. Data and observations were reviewed and distilled to arrive at a general evaluation for the assessment. The assessment identified one issue: difficulties in using the plant E&RC procedures, citing six examples, such as not using established procedures, and using uncontrolled copies of procedures as its basis. In addition, the assessment identified four items as weaknesses for management consideration, including items such as not trending chemistry parameters during the fourth quarter of 1992. Furthermore, NAD evaluated the licensee's self-assessment in several areas of E&RC and noted several examples of good self-assessments, including E&RC Event Reports, Monthly Performance Monitoring Report, and the Split Sample Program. An area in which improvements were needed was noted as the reluctance of E&RC Unit management and technicians to document deficiencies in order to trend them so that appropriate corrective action could be taken to preclude recurrence.

The inspector also reviewed two corporate reviews of Radwaste Shipping. The first was "Cask Book Review for Westinghouse/SEG Radwaste Shipping Cask Books," referenced in a memorandum of January 23, 1992 in File No. 12560B2A. Ten items (nine Certificates of Compliance and one Radiation Services Manual) were reviewed. All documents were reported to be current and no discrepancies were noted. The second was a review of Radwaste Shipment S-92-07 (a spent fuel shipment), referenced in a memorandum of June 4, 1992 in File No. 21110C. The review identified one strength in performance, one good practice in interface and communications, one minor error in procedures, two incomplete items on the shipping papers, one potential problem, and two potential safety items. However, the overall shipment performance was judged to be good.

The effectiveness of the licensee's audit/assessment program was greatly improved since the previous inspection in this area (refer to Inspection Report (IR) 50-261/92-10). The inspector concluded that the audit process was capable of identifying programmatic weaknesses and making recommendations for corrective action and that the TS audit requirements were satisfied.

No violations or deviations were identified.

4. Plant Water Chemistry (84750)

At the time of this inspection, the unit was in its fifteenth fuel cycle. The next refueling outage is scheduled for September 11, 1993. The inspector reviewed the plant chemistry controls and operational controls affecting plant water chemistry for the period of February 14 through April 15, 1993.

a. Primary Plant Water Chemistry

TS 3.1.6 specifies that the concentrations of dissolved oxygen (DO) and chloride in the Reactor Coolant System (RCS) be maintained below 0.10 parts per million (ppm) and 0.15 ppm, respectively, when the reactor coolant temperature exceeds 250 °F. TS 3.1.4 specifies that the total specific activity of the reactor coolant be limited to less than or equal to 1.0 microcuries/gram ( $\mu\text{Ci/g}$ ) dose equivalent iodine (DEI) under all modes of operation.

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. The oxygen parameter is established to maintain oxygen levels sufficiently low to prevent general and localized corrosion. The chloride parameter is established to provide protection from halide stress corrosion. The activity parameter is established to minimize personnel radiation exposure during operation and maintenance.

Pursuant to these requirements, the inspector reviewed graphs which correlated reactor power output to chloride and DO concentrations of the reactor coolant for the period referenced above. Additional graphs for specific activity for the period were reviewed. The inspector determined that the parameters were maintained well below TS limits. Typical values for DO and chloride were less than 0.001 ppm (the LLD (Lower Limit of Detection) for the "light tube" method of analysis) and less than 0.020 ppm (the LLD for the mercuric nitrate titration method of analysis), respectively. The inspector noted that chloride analysis using the ion chromatograph yielded concentrations of between 0.005 ppm and 0.017 ppm. Typical DEI values at steady-state conditions were  $2.0\text{E-}3 \mu\text{Ci/ml}$ .

On January 1, 1993, a small tight leak apparently developed in the fuel (refer to IR 50-261/93-01), as evidenced by a rise in the concentrations of I-131, DEI, Cs-138, and the I-131/I-133 ratio. The licensee's evaluation concluded that a pinhole leak had developed. The licensee continued to gather information in an effort to determine the age of the affected fuel (once-burned, twice-burned, etc.). The licensee planned to inspect the fuel during the next refueling outage in September.

b. Secondary Plant Water Chemistry

Section 3.G(1) of the Plant Operating License requires the licensee to implement and maintain a Secondary Water Chemistry Program to inhibit steam generator tube degradation.

The inspector reviewed the licensee's program. Chemistry Procedure CP-001, "Chemistry Monitoring Program," Rev. 27, approved March 3, 1992, established and described the analyses performed to support the program. It identified not only the critical parameters associated with the Steam Generators, but sampling frequency, sampling locations, and ranges of normal values for different modes of operation. The procedure also stipulated the requirements for maintaining required records. Administrative Action Levels and responses to be taken to restore an out-of-limit condition were described in CP-005, "Secondary Chemistry Corrective Action Program," Rev. 9, approved September 13, 1991. Procedures used to analyze the critical variables were made available to the inspector and included such items as the determination of boron, pH, chloride, and conductivity.

The inspector reviewed records of Steam Generators "A," "B," and "C" of for the randomly-selected period of February 20 through 26, 1993 and determined that the required parameters were maintained within their respective limits. (The unit operated at 100 per cent of capacity for the period reviewed.)

The inspector concluded that the Plant Water Chemistry was being maintained well within the TS requirements.

No violations or deviations were identified.

5. Liquid and Gaseous Effluent Processing and Monitoring (84750)

a. Liquid and Gaseous Monitoring Instrumentation

TSs 3.5.2 and 3.5.3 define the operation and surveillance requirements for monitors of radioactive liquid and gaseous effluent streams, respectively. This instrumentation is provided to monitor and control the releases of radioactive materials in effluents during effluent releases. The alarm/trip setpoints for these instruments is calculated in accordance with the procedures

in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR 20.

The inspector walked down nine process and effluent monitoring stations to become familiar with their physical location in the plant and to observe their state of maintenance and operability, including R-6, R-9, R-11, R-12, R-14, R-18, R-19, R-21, and R-22. R-11 had a Deficiency Tag dated April 12, 1993, which identified a problem with the continuous-feed recording paper. All of the other monitors were found to be well-maintained and operable.

From the licensee's monthly report, "Performance Monitoring of the Environmental and Radiation Control Unit," the inspector found the process and effluent monitor average monthly availability in 1992 for process monitors, flow devices, and gas analyzers to be 86.7%, 95.2%, and 89.1%, respectively. The average monthly availability for the first quarter of 1993 for process monitors, flow devices, and gas analyzers was reported to be 94.7%, 99.0%, and 99.2%, respectively.

b. Release Permits

TSs 3.9.1 and 3.9.2 state requirements for liquid effluent concentrations and TSs 3.9.3, 3.9.4, and 3.9.5 state requirements for gaseous concentrations. TSs 3.5.2 and 3.5.3 define the operating requirements for the radioactive liquid and gaseous effluent instrumentation systems, respectively. The inspector reviewed three Liquid Radioactive Waste Permits and four Gaseous Radioactive Waste Permits for the first quarter of 1993, including LRW # 93-17, LRW # 93-39, LRW # 93-67, GRW # 93-16, GRW # 93-24, GRW # 93-31, and GRW # 93-68, to verify compliance. The liquid releases included two continuous releases (one of condensate polisher waste water effluent and one of Steam Generator "B" blowdown) and one batch release (from Waste Condensate Tank (WCT) "C"). The gaseous releases included a continuous release (from Fuel Handling Building exhaust) and three batch releases (one from the Cask Decontamination Facility and two to relieve pressure in the Containment Building). Pre-release calculations were complete and included dose projections to the public (including whole body and critical organ) as well as the percentage of 10 CFR 50 quarterly and annual limits. The release history included the release start and stop times as well as radiation monitor information. The post-accountability calculations determined total activity released and verified compliance with 10 CFR 20 limits and quarterly and annual limits of 10 CFR 50.

TS 6.10.2.e requires that the licensee retain records of secondary water sampling and water quality "for the duration of the unit Operating License." The inspector went to the licensee's Document Control Vault and requested records for early gaseous and liquid releases. After reviewing a log of releases, the inspector arbitrarily chose Gaseous Release Nos. 74-131, 74-132, 76-02, and

89-106 and Liquid Release Nos. 190, 191, 192, 264, 265, and 347 (from 1970) and 519, 520, and 587 (from 1971). The documents were produced (via microfiche) for the inspector's review in a timely manner. The records were complete, satisfying regulatory requirements.

c. Liquid Waste Disposal Effluent Monitor Inoperability

On April 13, 1993, WCT "A" was to be released per LRW # 93-80. The contents of the tank had been recirculated, sampled, and counted. The setpoint of R-18, the Liquid Waste Disposal Effluent Monitor, had been set at 40,000 counts per minute (cpm) in preparation of the release. The release was initiated at 1704 hours and R-18 alarmed. (This in itself is not too unusual because the mechanical action of opening a valve will sometimes dislodge a bit of radioactively-contaminated material which had previously adhered to the valve.) In an effort to clear the monitor and re-initiate the release, the reactor operator (RO) pushed the "Reset" button. At that point, the monitor lost power and its rate meter lost its display. This was immediately recognized by the RO who entered Abnormal Operating Procedure (AOP)-005 and completed immediate and subsequent actions and an operator was dispatched to manually close the release control valve, RCV-018, and valve WD-1785 and the release was secured. (With loss of power to R-18, the valves are not automatically shut, making manual closure necessary.) This was done at 1708 hours. R-18 was declared out of service (OOS), Work Request (WR) 93-AEKM1 was written to investigate the problem and restore the monitor to service, and TS Table 3.5-6 was entered. In addition, Adverse Condition Report (ACR) No. 93-061 was written to assess the incident. The release was eventually completed under the authority of TS Table 3.5-6, Item 1.a.

An investigation by the licensee determined that the problem was a non-annunciation of the FAIL relay upon loss of the 5 VDC power supply of the rate meter. (All other power supply failures were annunciated by way of fail-safe relay operation.) Discussions between the licensee and the fabricator of the rate meter led to a proposed fix. As a precaution, the licensee declared all radiation monitors with the same model of rate meter to be inoperable until a fix could be determined and implemented. The proposed fix was successfully tried on a spare rate meter. The failure was an unanalyzed failure, which required a notification per 10 CFR 21 by the fabricator to the Nuclear Regulatory Commission (NRC) and all users of the product in the nuclear industry. The licensee worked diligently to modify and restore all OOS monitors to service. All but four monitors (R-2, R-7, R-13, and R-16) were restored to service by April 25. R-2 and R-7 were to be modified during a containment entry planned for April 28. R-13 had failed an internal source check and R-16 was out of calibration by twenty-five cpm. The licensee planned take remedial action to restore them to service as soon as possible.



The inspector concluded that the program for liquid and gaseous processing and monitoring was being successfully implemented and that the licensee's prompt response to the inoperable radiation monitors illustrated dedication to maintaining a credible radiation monitor system.

No violations or deviations were identified.

6. Post Accident Sampling System (PASS) (84750)

Sections 3.G(3) and (4) of the Plant Operating License requires the licensee to implement and maintain a program "to determine the airborne concentration in vital areas under accident conditions" and "to ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant effluents, and containment atmosphere samples under accident conditions." The program should enable the licensee to obtain information critical to the efforts to assess and control the course and effects of an accident. Furthermore, the program shall include: training of personnel, procedures for sampling and analysis, and provisions for maintenance of sampling and analysis. Also, Criterion 2.a of NUREG-0737 requires the licensee to implement a program such that the sample be promptly obtained and analyzed (within three hours) 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.

The inspector discussed the status of the licensee's efforts to expand the pool of qualified technicians with the Chemistry Supervisor. The new Chemistry Procedure, CP-088, "Post Accident Diluted Liquid Sampling," had become effective August 13, 1992. It detailed the steps required to operate the PASS to obtain a liquid sample remotely. This procedure was the result of a decision to have two levels of qualification for the PASS, one level which would allow a technician to take liquid and gaseous samples and do normal operations, and another (higher) level which could trouble-shoot and maintain the system as well as do the normal operations. This new procedure was required training for all Chemistry Technicians, as was training on CP-083, "Post Accident Containment Air Sampling."

The inspector interviewed the licensee's training instructor for the PASS and reviewed Lesson Plan CH6C03R, "Post Accident Sampling System - Containment Atmosphere and Diluted Liquid Sampling," Rev. 2, approved February 3, 1993. The lesson plan included references, a course outline, and learning objectives for both classroom material and walkdown practical and the inspector determined its scope to be comprehensive. Test questions from the bank of questions were reviewed by the inspector and determined to be appropriate.

The inspector reviewed training records of the E&C technicians and determined that eight technicians were qualified to take both liquid and gaseous PASS samples and that one additional technician was qualified to

take gaseous samples and was expected to be qualified to take liquid samples in the near future.

The training department had modified Qualification Checkout Cards (QCCs) of the technicians to reflect the different levels of expertise. The inspector reviewed the QCC of one of the technicians who had been requalified to verify that it accurately reflected his retraining under the revised criteria. The QCC was accurate and complete.

The inspector concluded that the licensee had made significant progress in expanding the number of qualified technicians to operate the PASS.

No violations or deviations were identified.

7. Semiannual Radioactive Effluent Release Report (84750)

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 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 on the following page.

Robinson Radioactive Effluent Release Summary

	1990	1991	1992
Abnormal Releases			
Liquid	0	0	0
Gaseous	0	0	0
Activity Released (curies)			
a. Liquid			
1. Fission and Activation Products	3.60E-1	2.35E-1	2.28E-1
2. Tritium	3.53E+2	1.88E+2	3.94E+2
3. Gross Alpha	0.00E+0	< LLD	< LLD
b. Gaseous			
1. Fission and Activation Gases	7.21E+0	2.26E+0	7.49E+0
2. Iodines	1.09E-7	< LLD	1.21E-6
3. Particulates	1.34E-4	1.73E-4	1.39E-4
4. Tritium	4.44E+0	4.48E+0	1.88E+0

A comparison of data from liquid and gaseous effluents 1990, 1991, and 1992 showed no significant changes. All liquid and gaseous effluent

parameters ended 1992 at less than one percent of their applicable limits. The licensee attributed this outstanding performance to continued good reactor coolant and fuel integrity.

There were no changes to the REMP (as a result of the Land Use Census), the PCP, or the Radioactive Waste Systems (liquid, gaseous, or solid) during the second half of 1992.

Changes to the ODCM had been made to reflect additions/updates to the "Radiological Environmental Analysis and Sample Point Description" due to the licensee's implementation of the new 10 CFR Part 20 and to correct some typographical errors.

No outside liquid holdup tank or waste gas decay tank exceeded its regulatory limit of ten curies and  $1.90E+4$  curies, respectively.

One radiation monitor, R-16, was reported to be out of service for greater than thirty days during this period. R-16, which monitors service water from the containment vessel High Volume Heat (HVH) units, was declared to be inoperable on August 31, 1992 due to erratic readings. Because this monitor had experienced recurring spiking problems, an extensive trouble-shooting effort was initiated. The monitor was returned to service on September 30, 1992. During the period of inoperability, compensatory surveillances were initiated, as required by Table 3.5-6 of the TSs.

The following table summarizes solid radwaste shipments for burial or disposal for the previous two and a half years. These shipments typically include spent resins, filter sludge, dry compressible waste, and contaminated equipment.

Robinson Solid Radwaste Shipments

	1990	1991	1992
Number of Waste Disposal Shipments	61	90	92
Volume (cubic meters)	69.9	64.5	62.5
Activity (curies)	61.8	95.4	446.7

For the 1993 calendar year to date (April 22), the licensee had made fourteen radioactive material shipments, including one to the disposal facility, ten special, and three laundry.

For solid radwaste, the most significant change noted for the period reviewed was a dramatic increase in the activity shipped. The increase was due to the disposal of sludge from the Waste Holdup Tank.

The inspector concluded that the Semiannual Radioactive Effluent Release Report was complete and satisfied regulatory requirements.

No violations or deviations were identified.

8. 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 the Department of Transportation (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 Radwaste Group within the E&RC Department. Radwaste was processed and packaged (including the preparation of shipping documentation) by the Radwaste Group.

a. Radioactive Materials Shipment Documentation Packages

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. Radioactive materials shipments were classified into four categories: Casks (for disposal at a burial site); Low Specific Activity (LSA) sent to Scientific Ecology Group, Incorporated (SEG) for incineration and/or compaction prior to final disposal; Special Shipments (including virtually anything from spent fuel to samples containing Limited Quantities); and Laundry. The inspector reviewed two shipping documentation packages for radioactive materials shipments made since the last inspection (January 1993), including Shipment Nos. S-93-03 (an exclusive use spent fuel cask shipment) and S-93-08 (samples sent for analysis via a non-exclusive use vehicle). The documentation packages were thorough and included shipment information 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, a 24-hour emergency telephone number, emergency response information sheets, etc. The radiation and contamination survey results were within the limits specified by 49 CFR and the shipping documents were being maintained as required.

b. Shipment C-93-01

Radwaste shipment C-93-01 was made during the period that the inspector was on site. Before the truck left the site, the

inspector reviewed the final survey records of the shipment and conducted a "spot check" of several of the survey points and found them to be in agreement. The inspector concluded that the survey was properly done and well documented. In addition, placarding of the vehicle and the general condition of the tractor/ trailer were reviewed by the inspector. No irregularities were identified.

The inspector reviewed the documentation package for the shipment and determined that it was thorough, complete, and satisfied the shipping requirements.

The inspector concluded that the licensee had good programs in place for the handling and shipping of radioactive material and that they were effectively implemented.

No violations or deviations were identified.

9. Decommissioning Planning Records (84750)

10 CFR 50.75(g) requires, in part, that licensees maintain "records of information important to the safe and effective decommissioning of the facility in an identified location until the license is terminated by the Commission." Furthermore, information considered important by the Commission for decommissioning is identified as "records of spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site" and that the records "must include any known information on identification of involved nuclides, quantities, forms, and concentrations." Also identified are "as-built drawings and modifications of structures and equipment in restricted areas where radioactive materials are used and/or stored and of locations of possible inaccessible contamination such as buried pipes which may be subject to contamination."

During Inspections 92-23 and 93-01, the inspector requested the licensee's decommissioning planning records to verify compliance with the regulations and held discussions with the licensee's Records Management Supervisor to determine program status/effectiveness. The inspector determined that while the subject information was in the licensee's document control vault, in the form of microfiche and drawings, it was not segregated into one readily identifiable area nor was a listing identifying pertinent information for decommissioning planning available. Timely retrieval and proper classification of documentation (both existing and future) could not be guaranteed. To remedy this shortcoming, the licensee developed a program which established a Records Task Force (RTF), consisting of eight representatives, whose activities include:

- to review all newly-created plant records, not only those required for decommissioning planning.
- to determine storage/retention requirements for each record.

- to establish the appropriate quality classification (Q or non-Q).
- to identify indexing parameters to facilitate record retrieval.

During the current inspection, the inspector interviewed the Records Management Supervisor to determine the status of the licensee's program. The licensee had submitted Revision 10 of Plant Program PLP-003, "Records Management Program," for review and final approval, which was expected in early May. The revision formally defined Records Important to Decommissioning and the Records Task Force (including its responsibilities). It also established the procedure to be used in transmitting Records Important to Decommissioning to Records Management to allow their indexing into the Automated Records Management Storage and Retrieval System to facilitate retrieval.

The inspector concluded that the licensee was making satisfactory progress in the implementation of a program to identify relevant decommissioning planning records.

No violations or deviations were identified.

#### 10. Exit Interview

The inspection scope and results were summarized on April 23, 1993, 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.

#### 11. Acronyms and Initialisms

ACR - Adverse Condition Report  
 AOP - Abnormal Operating Procedure  
 CFR - Code of Federal Regulations  
 Ci - curie  
 CP - Chemistry Procedure  
 CPL - Carolina Power and Light  
 cpm - counts per minute  
 DEI - Dose Equivalent Iodine  
 DO - Dissolved Oxygen  
 DOT - Department of Transportation  
 E&RC - Environmental and Radiation Control  
 F - Fahrenheit  
 g - gram  
 HVH - High Volume Heat  
 IR - Inspection Report  
 l - liter  
 LLD - Lower Limit of Detection  
 LSA - Low Specific Activity  
 $\mu$ Ci - micro-Curie (1.0E-6 Ci)

ml - milli-liter  
NAD - Nuclear Assessment Department  
No. - Number  
NRC - Nuclear Regulatory Commission  
ODCM - Offsite Dose Calculation Manual  
OOS - Out Of Service  
PASS - Post Accident Sampling System  
PCP - Process Control Program  
ppm - parts per million  
QCC - Qualification Checkout Card  
RCS - Reactor Coolant System  
REMP - Radiological Environmental Monitoring Program  
Rev - Revision  
RO - Reactor Operator  
RTF - Records Task Force  
SEG - Scientific Ecology Group, Incorporated  
TS - Technical Specification  
VDC - Volts Direct Current  
WCT - Waste Condensate Tank  
WR - Work Request