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SUBJECT: Forwards response to violations noted in Insp Rept  
 50-261/93-26. Corrective actions: locked high radiation area  
 (LHRA) keys in control room changed out to correct LHRA keys  
 & Administrative Procedure AP-031 will be revised.

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United States Nuclear Regulatory Commission  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
NRC INSPECTION REPORT NO. 50-261/93-26 REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company hereby provides this reply to the Notice of Violation identified in NRC Inspection Report 50-261/93-26.

Enclosure 1 provides 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.

Should you have any questions regarding this matter, please contact Mr. W. J. Dorman at (803) 383-1186.

Very truly yours,

Charles R. Dietz  
Vice President

RES:sgk  
Enclosures  
c: Mr. S. D. Ebnetter  
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## REPLY TO A NOTICE OF VIOLATION

### Violation RII-93-26-01-SL4:

Technical Specification 6.11 requires that procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Administrative Procedure AP-031, Administrative Controls For Entry Into Locked High Radiation Areas, Revision 17, dated March 11, 1993, details the requirements associated with Locked High Radiation Areas, and Very High Radiation Areas. Section 3.4 states that "the Radiation Control Supervisor is responsible for issuing master locked high radiation area and locked high radiation area keys". Section 3.5 states that "the Unit 2 Operations Shift Supervisor is responsible for administratively controlling locked high radiation area keys maintained for emergency use".

Contrary to the above the licensee failed to follow Sections 3.4 and 3.5 of Procedure AP-031 as follows:

1. As required by Section 3.4 of Procedure AP-031, the Radiation Control Supervisor failed to issue new locked high radiation area keys to the Unit 2 Control Room in a timely manner following re-keying of the locks on September 23, 1993. Therefore, for the period September 23 through October 26, 1993, when identified during the onsite inspection, the Control Room did not possess operable keys for locked high radiation area access if needed to respond to an emergency situation (e.g., End Path Procedure, EPP-9, Transfer to Cold Leg Recirculation, Revision 12, dated March 31, 1993).
2. The Unit 2 Operations Shift Supervisor failed to maintain administrative control of the Control Room locked high radiation areas keys as required by Section 3.5 of Procedure AP-031 in that on two occasions personnel were issued keys to perform non-emergency, routine activities. Specifically, on September 17, 1993, key No. 180 was issued to a fire protection worker and on September 21, 1993, key No. 178 was issued to an Instrument and Control Technician.

### REPLY

CP&L acknowledges the violation.

#### 1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. The violation is attributed to an inadequate procedure, AP-031, "Administrative Controls For Entry Into Locked High Radiation Areas" in that the procedure did not address changing out keys in the Control Room.

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

The Corrective Steps that have been taken are as follows:

- A. The Locked High Radiation Area (LHRA) keys in the Control Room were changed out to the correct LHRA keys.
- B. The Radiation Control Supervisors have been trained to prevent a recurrence of this key control event.
- C. Operations shift personnel with access to the key locker were made aware of the importance of not issuing those keys designated for emergency issuance only.
- D. A new small key locker has been hung in the Shift Supervisor's office to place keys that would not be issued routinely. This key locker has been labeled "Do not issue - Emergency use only".

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

In order to preclude recurrence of this violation, Procedure AP-031, "Administrative Controls For Entry Into Locked High Radiation Areas" will be revised to encompass a section for changing Locked High Radiation Area (LHRA) keys/cores. The revision will include a process to maintain accountability for the keys/cores.

4. The Date When Full Compliance Will Be Achieved

Procedure AP-031 will be revised by January 17, 1994, to incorporate the requirement to maintain accountability for the keys/cores.

Violation RII-93-26-03-SL4:

Technical Specification 6.5.1.1.1(a) requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, dated February 1978.

Section 7 of Regulatory Guide 1.33, Appendix A, Revision 2, dated February 1978, recommends that procedures be written covering control of radioactivity for the purpose of limiting materials released to the environment and limiting personnel exposure.

Section 6.8 of Fuel Management Procedure, FMP-021, Control of Material in the Spent Fuel Pool, Revision 0, dated December 20, 1991, states that "materials suspended from the side of the spent fuel pool shall be tied off/attached to stainless steel material and shall be connected to a locking device that is controlled by the health physics group. This is to avoid inadvertent removal of these materials from the spent fuel pool".

Contrary to the above, the licensee failed to follow Section 6.8 of Procedure FMP-021. During the period of approximately October 20 through 26, 1993, a piece of an activated reactor coolant pump bolt contained within a basket, measuring approximately 650 rem/hour contact with the bolt, was suspended from the side of the spent fuel pool by a rope. There was no stainless steel material connected to a locking device controlled by the health physics group to avoid inadvertent removal of the bolt from the spent fuel pool.

### REPLY

1. The Reason for the Violation

CP&L acknowledges that the violation occurred as described. This violation is attributed to a combination of failure to follow procedure FMP-021 for control of materials in the Spent Fuel Pit, and inadequate procedure HPP-007 for handling and storage of contaminated and radioactive materials.

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

Supervision has discussed the importance of implementing FMP-021, "Control of Materials in the Spent Fuel Pool" and the significance of failing to implement this procedure with the individuals involved.

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

In order to preclude recurrence of this violation, the following steps will be taken:

- A. Procedure AP-031, "Administrative Controls For Entry Into Locked High Radiation Areas" will be revised to include administrative controls for areas with the potential to reach Locked High Radiation Area (LHRA) or Very High Radiation Area (VHRA) criteria. HPP-007, "Handling and Storage of Contaminated and Radioactive Materials" will be revised to contain explicit instructions for storing/hanging material from the side of the CV Cavity or the Spent Fuel Pool. Procedure HPP-007 will be revised to include posting of a sign that warns of the hazards of source withdrawal.
- B. References for NRC Information Notice No. 90-33, "Source of Unexpected Occupational Radiation Exposure at Spent Fuel Storage Pools" and procedure FMP-021, "Control of Materials in the Spent Fuel Pool" will be placed in HPP-007, "Handling and Storage of Contaminated and Radioactive Materials" and in AP-031, "Administrative Controls For Entry Into Locked High Radiation Areas".

4. The Date When Full Compliance Will Be Achieved

Procedures AP-031, "Administrative Controls For Entry Into Locked High Radiation Areas" will be revised to include administrative controls for areas with the potential to reach Locked High Radiation Area (LHRA) or Very High Radiation Area (VHRA) criteria. APP-031 will also be revised to reference NRC Information Notice No. 90-33, "Source of Unexpected Occupational Radiation Exposure at Spent Fuel Pools" and FMP-021, "Control of Materials in the Spent Fuel Pool". This revision will be completed by January 17, 1994.

Procedure HPP-007, "Handling and Storage of Contaminated and Radioactive Materials" will be revised to contain explicit instructions for storing/hanging material from the side of the Containment Vessel Cavity for the Spent Fuel Pool. In addition, this procedure will be revised to including references for NRC Information Notice No. 90-33, "Source of Unexpected Occupational Radiation Exposure at Spent Fuel Storage Pools" and FMP-021, "Control of Materials in the Spent Fuel Pool". This procedure revision will be completed by March 16, 1994.