

Official

MAY 28 1991

Docket No. 50-400
License No. NPF-63

Carolina Power and Light Company
ATTN: Mr. Lynn W. Eury
Executive Vice President
Power Supply
P. O. Box 1551
Raleigh, NC 27602

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-400/91-03

Thank you for your response of April 26, 1991, to our Notice of Violation and Notice of Deviation issued on March 27, 1991, concerning activities conducted at your Harris facility.

In your response to the Notice of Violation, you state that "the "mechanics" of removing the sample from the "pig" is simplistic and straight forward." It is our position that there is a reasonable likelihood that this would not be the case, i.e. that removal of the sample from the pig would not be straight forward. It is important to consider, and account for, sample volume changes or losses incurred during the sample acquisition, transport and removal process. These sample losses and/or changes could prevent correct analysis of the sample. This position has been verified by the experiences of other nuclear facilities, who have indicated that it took extensive effort to quantify the sample volume after removal; requiring the development and implementation of a written procedure, much the same as for the sampling and analysis of the diluted sample.

Effective radiation protection precautions would play an important role in the procedure, and should be incorporated. The development of this procedure would be considered a program improvement.

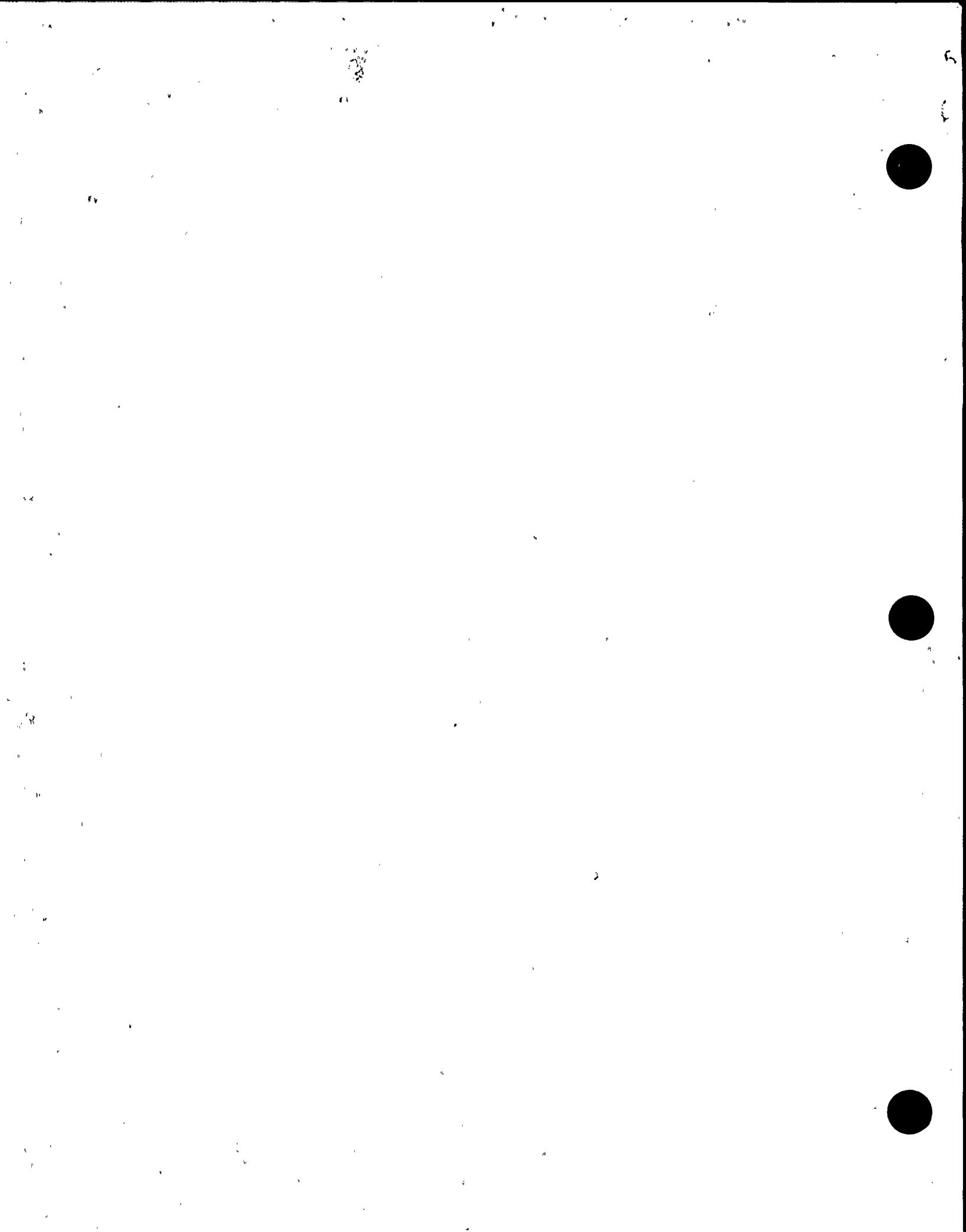
After consideration of your basis for the denial of the violation, we have concluded that the violation, as stated, was valid. Based on the review of the information provided in your response, we have concluded that you have prescribed adequate corrective actions for the violation. Therefore, no further response is required.

We have examined your response to the Notice of Deviation and have concluded that your corrective actions are adequate. Therefore no further response is required.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

We appreciate your cooperation in this manner.

Sincerely,


J. Philip Stohr, Director
Division of Radiation Safety
and Safeguards

cc: R. B. Richey, Vice President
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RII:DRSS
DS
DSeymour
5/17/91

RII:DRSS
T
TDecker
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RII:DRP
H
HChristensen
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RII:DRSS RII:ERCS
DM *JK*
DMCollins GJenkins
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Site reviewed prior to
change in 2.7.92 to remove
10 day review -
b7m 5/24/91