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 ROBINSON, W.R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 930617 ltr re violations noted in Insp Rept 50-400/93-11. Corrective actions: health physics personnel increased radiological surveillance frequency in radioactive matl storage areas to weekly.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company

**HARRIS NUCLEAR PLANT
P. O. Box 165
New Hill, North Carolina 27562**

JUL 16 1993

Letter Number: HO-930122

NRG-822

Document Control Desk
United States Nuclear Regulatory Commission
Washington, DC 20555

**SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400
LICENSE NO. NPF-63
REPLY TO A NOTICE OF VIOLATION**

Gentlemen:

In reference to your letter of June 17, 1993, referring to NRC Inspection Report RII: 50-400/93-11, the attached is Carolina Power and Light Company's reply to the violation identified in Enclosure 1.

It is considered that the corrective actions taken/planned are satisfactory for resolution of the violation.

Thank you for your consideration in this matter.

Very truly yours,

W. R. Robinson
General Manager
Harris Nuclear Plant

MGW:cmg

Attachment

cc: Mr. S. D. Ebnetter (NRC-RII)
Mr. N. B. Le (NRC-NRR)
Mr. J. E. Tedrow (NRC-SHNPP)

MEM/HO-930122/1/OS1
9307220308 930716
PDR ADDCK 05000400
Q PDR



REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/93-11Reported Violation:

Technical Specification 6.11.1 states that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Health Physics Procedure, HPP-800, Handling Radioactive Materials, Revision 0, dated January 1, 1993, provides instructions for controlling material in RCAs. Section 9.1.a. requires, in accordance with 10 CFR 20.1904(a), each container of radioactive material with quantities greater than those listed in 10 CFR Part 20, Appendix C, bear a durable, clearly visible label bearing a radiation symbol and words "Danger, Radioactive Material" or "Caution, Radioactive Material." The label must provide sufficient information, such as radiation levels, radionuclides, and amount of radioactivity, to allow individuals handling, using, or working in the vicinity of such containers to take precautions against exposure. Additionally, Section 6.1.3.b. of Attachment 13 requires a completed Radioactive Material Tag to be attached to the material when removable contamination is detected at a level greater than 100 net counts per minute (cpm) for a survey area of approximately 100 square centimeters (cm²). Section 6.5.2 of Attachment 13 requires tools and scaffolding having fixed contamination, greater than 100 net cpm per probe area, to be marked with magenta paint if they are to be reused.

Contrary to the above, following requests by the inspector for contamination surveys, eleven items in the East Hot Machine Shop were determined not to have a completed Radioactive Material Tag or to be painted magenta, although smearable and/or fixed contamination was detected at levels exceeding the limits established in HPP-800. Additionally, one pressurizer relief valve was identified in the Receiving Warehouse which was not appropriately labeled in accordance with HPP-800.

This is a Severity Level IV violation (Supplement IV).

Denial or Admission:

The violation is admitted.

Reason for the Violation:

The violation occurred due to a failure to properly control radioactive material placed in storage areas. Specifically, items with fixed and/or removable contamination were placed into storage without being properly tagged and bagged or otherwise identified as contaminated as required by plant procedure HPP-800. The existing radioactive material storage and inventory program allowed excessive radioactively contaminated tools and equipment to accumulate, thereby compounding the scope of the problem.

The failure to tag the stored pressurizer relief valve located in the Receiving Warehouse was the result of confusion in procedures regarding the relationship between the posting requirements for "areas" and the tagging/labelling requirements for "containers". The area around the valve was posted in

accordance with HPP-625, Performance of Radiological Surveys. However the valve's container was not tagged/labelled as required by HPP-800 for containers with greater than 10CFR20 Appendix C quantities (i.e. non-exempt quantities).

Corrective Steps Taken and Results Achieved:

Following the detection of contamination on the eleven items in the Hot Machine Shop, items with smearable contamination were bagged and tagged and items with fixed contamination were tagged and/or spray painted magenta in accordance with HPP-800.

Areas designated for radioactive material storage were toured for the purpose of identifying items which are not expected to be reused. As a result, items were earmarked for disposal. Routinely used items (e.g. small tools, hoses, belts) were returned to the Hot Tool Room for issuance, and items with low contamination levels were decontaminated and placed into clean storage.

A Radioactive Materials Tag was placed on the stored pressurizer relief valve in accordance with HPP-800.

Corrective Steps Taken to Avoid Further Violations:

Health Physics (HP) personnel have increased radiological surveillance frequency in radioactive material storage areas to weekly, and specifically include an assessment of radioactive material tagging and bagging.

Standards for radioactive material storage, including radiological controls, housekeeping and inventory requirements, will be developed and implemented into AP-535, Performing Work in RCAs. This action will be completed by August 31, 1993.

A step has been added to HPP-625 to remind HP technicians to tag/label individual containers of radioactive material in accordance with HPP-800 even if the area around the container is posted as a Radioactive Materials Area. A note was added to HPP-800 to clarify container tagging/labelling requirements if a clear determination of exempt quantity status cannot be made. These revisions were completed on May 20, 1993.

In addition to the procedural changes implemented and planned, the overall requirements for posting and tagging/labelling will be reviewed with HP personnel. This will be done by HP supervision during Third Quarter Radiation Control Continuing Training which will be completed by September 30, 1993.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved immediately upon properly bagging and tagging the contaminated material. This was performed prior to completion of the NRC Inspection. Additional corrective actions to prevent recurrence will be completed by September 30, 1993.