



Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

JAN 13 1983

Robinson File No: 13510E

Serial: RSEP/83-65

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
RESUBMITTED RESPONSE TO NRC INSPECTION 82-34

Dear Mr. O'Reilly:

Carolina Power and Light Company has received and reviewed your January 3, 1983 letter that does not accept CP&L's denial of part 1 of Violation A of the subject report. Thank you for considering CP&L's position in this matter. The following response is provided as requested in your letter.

Severity Level IV Violation (IER-82-34-07-SL4)

Technical Specification 6.13.1 requires that any individual or group of individuals permitted to enter high radiation areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area. Also, each entrance or access point to a high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. shall be provided with locked doors to prevent unauthorized entry into such areas.

Contrary to the above, controls for high radiation areas were not adequately established in that:

Part (1) On September 27, 1982, an individual was observed coming out of the "B" waste evaporator room, a high radiation area, without a dose rate instrument. The instrument was observed to be outside of the high radiation area.

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1. Reason For The Violation

The technician in question had been issued a radiation monitoring device which was capable of continuously indicating the radiation dose in the area as per Technical Specification 6.13.1(a). The technician made a survey of the area prior to any work being performed. He was leaving the area when he re-entered in order to check the position of a valve; he gave the survey instrument to a worker right outside of the step-off pad to be protectively wrapped. The technician felt reasonably confident that the previously surveyed radiation level had not been altered in the brief time span from his survey of the area prior to leaving and his re-entrance into that area.

At the time the work was performed in the high radiation area, a survey was made which was "reasonable under the circumstances to evaluate the extent" of a radiation hazard.

2. Corrective Steps Which Have Been Taken And Results Achieved

This occurrence was reviewed with the individual involved to ensure he is aware of the violation against his actions.

3. Corrective Steps Which Will Be Taken To Avoid Further Violation

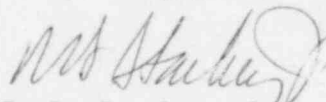
The necessity for an individual to maintain a radiation monitoring device within the high radiation area while the individual is in the area will be re-emphasized to the appropriate plant personnel by January 28, 1983. The requirements for the possession and correct use of a continuous monitoring survey instrument while an individual or group of individuals work or enter a high radiation area will be re-reviewed to ensure that these requirements are being met. Appropriate plant employees will be informed of any additional guidance that results from this re-review.

4. Date When Full Compliance Will Be Achieved

This corrective action will be completed by June 1, 1983.

If you have any questions on this resubmittal, please contact me.

Very truly yours,



R. B. Starkey, Jr.

General Manager

H. B. Robinson SEG Plant

CLW/bss

cc: R. C. DeYoung