



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

Report No.: 50-261/84-31

Licensee: Carolina Power and Light Company
411 Fayetteville Street
Raleigh, NC 27602

Docket No.: 50-261

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection Dates: August 9-10, 1984

Inspection at H. B. Robinson site near Hartsville, South Carolina

Inspector: *T. R. Collins*
T. R. Collins

8/21/84
Date Signed

Approved by: *G. R. Jenkins*
G. R. Jenkins, Section Chief
Division of Radiation Safety and Safeguards

8/21/84
Date Signed

SUMMARY

Areas Inspected

This special unannounced inspection involved 8 inspector-hours on site during regular hours inspecting corrective actions taken by the licensee to control access to locked high radiation areas.

Results

A second example of a previously cited violation was identified related to improper controls over entry into a locked high radiation area.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

R. E. Morgan, General Manager
W. Crawford, Manager, Operations and Maintenance
R. Smith, Manager, Environmental and Radiation Control
F. Gilman, Project Specialist, Regulatory Compliance
C. Wright, Specialist, Regulatory Compliance
R. Denny, Health Physics Supervisor
B. Meyer, Health Physics Supervisor

Other licensee employees contacted included two technicians, two operators, and office personnel.

2. Exit Interview

The inspection scope and findings were summarized on August 10, 1984, with those persons indicated in paragraph 1 above. The inspector discussed with licensee management representatives the controls that have been established for locked high radiation area access control. These controls are discussed in more detail in Paragraph 4 of the Report Details. The inspector stated that the improper entry into a high radiation area on July 28, 1984, constituted a second example of the violation cited in Inspection Report 84-05 and addressed in NRC's letter of March 13, 1984 regarding the proposed imposition of a civil penalty.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Control of Access to Locked High Radiation Areas

This inspection reviewed the corrective actions taken by the licensee to prevent entries into locked high radiation areas without the required radiation survey instruments and to assure compliance with the posted radiological requirements prior to entry.

On July 28, 1984 three individuals were performing hanger inspections (IE Bulletin 79-14) on Radiation Work Permit (RWP) 2001. These individuals entered the Waste Holdup Tank Room (WHUT) which was posted as a Locked High Radiation Area, Contaminated Process Equipment Area and Contamination Area. Also, the WHUT room was posted Contact RC Technician Prior to Entry and survey instrument required for entry. The maximum radiation level in the WHUT room at eighteen inches from the tanks was 1500 mr/hr. The individuals did not wear the required protective clothing for access to the WHUT room, they did not have a radiation survey instrument, and they did not contact a RC Technician prior to entry. Therefore, all three individuals

violated plant procedures and technical specifications for high radiation area access control. In addition, all three individuals became contaminated. This contamination was removed using normal decontamination techniques.

On August 9, 1984, the inspector toured the licensee's facility and reviewed the licensee's interim corrective actions to preclude future events of this type, as stated in their letter dated August 3, 1984. These corrective actions were as follows:

1. Issuance of a locked high radiation key is by the HP Foreman after approval by the Shift Foreman.
2. The HP Foreman only issues a locked high radiation key after verifying that the Shift Foreman has approved the entry(s) and that the requesting individual or the assigned HP coverage has a survey instrument.
3. HP coverage is provided to personnel for entries into locked high radiation areas.
4. Operations personnel maintain locked high radiation keys for use on an emergency basis. Non-emergency access is through the controls described herein.
5. The HP Foreman and Shift Foreman are verbally notified when the entry(s) into the locked high radiation area is complete, and the locked high radiation key has been returned.
6. High radiation areas within the containment that are physically locked are controlled as stated above.
7. Meetings were held by August 10, 1984 with available onsite personnel to emphasize the importance of adhering to procedures, obeying radiation postings, and proper accessing of locked high radiation areas.

In addition to the above specific interim actions and the final corrective actions for this concern (a new Locked High Radiation Key Control System), a comprehensive review of the overall Health Physics program is underway. This review is being conducted by the new Manager-Environmental and Radiation Control. Preliminary results of this review have identified several areas for improvement and a tentative plan is being developed.

The inspector observed individuals working in a Locked High Radiation Area (LHRA), Boric Acid Evaporator Equipment Room, on RWP 2001, to verify that the above mentioned controls were in place. After personal interviews with appropriate licensee personnel (RC Foreman, RC Technician and Shift Foreman) the inspector stated that the corrective actions described in CP&L's letter of August 3, 1984, appeared to be in place. The inspector had no further questions.