CP&L
Carolina Power & Light Company

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

AUG 10 1984

Robinson File No: 13510E Serial: RSEP/84-515

Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street N.W.
Atlanta, Georgia 30323

H. B. ROBINSON SEG PLANT, UNIT 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
IE INSPECTION REPORT IER-84-17

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following response.

A. Severity Level IV Violation (IER-84-17-03-SL4)

NRC Order dated March 14, 1983 requires, in part, that the licensee implement and maintain the post accident monitoring capability set forth in NUREG 0737, Item II.F.1. NUREG 0737, Item II.F.1, attachment 3, specifies that the licensee provide two containment high-range radiation monitors which meet the requirements of Table II.F.1-3. Table II.F.1-3 specifies that an onsite calibration by electronic signal substitution is to be performed for all range decades above 10R/hr.

Contrary to the above, as of May 12, 1982, the two High-Range Primary Containment Radiation Monitors, RM-32 "A" and "B" had not been calibrated by electronic signal substitution through each decade up to 1 E+7 R/hr.

RESPONSE

1. Admission or Denial of the Alleged Violation

Carolina Power and Light acknowledges the alleged violation.

2. Reason For The Violation

The calibration check procedure for RMS-32 A and B was written in accordance with the vendor Technical Manual. The Technical Manual did not describe electronic calibration for the 10^6 and 10^7 R/hr ranges.

3. Corrective Steps Which Have Been Taken

Subsequent discussion with the vendor indicates that there is an additional check which could be done to verify these upper two channels, 10^6 and 10^7 R/hr.

4. Corrective Steps Which Will Be Taken

A procedure to include the 10^6 and 10^7 R/hr ranges will be implemented.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by September 28, 1984.

B. Severity Level IV Violation (IER-84-17-02-SL4)

10 CFR 20.103(a)(3) requires the licensee to use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas.

Contrary to the above, the requirement to use suitable measurements of concentrations of radioactive material in air was not met in that air samples performed on May 24, 1984 to evaluate airborne radioactivity levels in the "A" steam generator channel head were not taken near the breathing zone of the workers.

RESPONSE

1. Admission or Denial of The Alleged Violation

Carolina Power and Light Company acknowledges the violation as stated.

2. Reason for The Violation

The RC Technician rendering continuous coverage did pull an air sample. The nature of the work was to pass material from inside the bowl out through the manway to the pump bay. The Technician pulled an air sample while work was ongoing at the manway believing this to be a representative sample.

3. Corrective Steps Which Have Been Taken

Work in the steam generator bowls is essentially complete until after completion of the primary system hydro. If it becomes necessary to enter a steam generator bowl in the interim, the RC Foremen have been instructed to brief RC Technicians covering the work on the requirements for obtaining representative air samples.

4. Corrective Steps Which Will Be Taken

RC Technicians covering jobs will be trained on the proper techniques of obtaining steam generator bowl air samples. This training shall be completed prior to beginning eddy current inspection work following the primary system hydro of the steam generators.

A study of the adequacy of the Air Sampling Program will be conducted and revisions to the program will be made as necessary to prevent further recurrence by February 28, 1985.

5. Date when Full Compliane Will Be Achieved

Full compliance will be achieved by February 28, 1985.

C. Severity Level IV Violation (IER-84-17-01-SL4)

Technical Specification 6.5.1.1.1 requires that written procedures be established, implemented and maintained covering applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978. Appendix "A" Regulatory Guide 1.33 states that the licensee should have procedures for a radiation work permit (RWP) system.

Health Physics Procedure HP-006, Radiation Work Permits (RWP) requires that individuals know and understand RWP's prior to entering the radiation control area. Procedure HP-006 also specifies that a Health Physics Technician, when rendering continuous coverage for a job, is responsible for assuring RWP requirements are met.

Contrary to the above, Procedure HP-006 was not followed in that: a) on May 24, 1984, individuals entered "A" Steam Generator Channel Head without respiratory protection equipment required by RWP #2051, and b) the Health Physics Technician rendering continuous coverage for this job did not assure that the RWP requirements were met.

RESPONSE

1. Admission or Denial of The Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason for The Violation

Upon identification of facial contamination on two personnel, the Plant staff immediately investigated the incident. The following is a summary of the events:

2. Reason for the Violation (continued)

The RC Technician rendering continuous coverage was unaware that the RWP covering the work required respiratory protection for steam generator bowl entry. The RC Technician questioned the workers on what the respiratory protection requirements were, and it was the consensus of opinion that the RWP respiratory protection requirements were "as posted". The RC Technician made an on the job decision to not require respiratory protection based on his understanding of the following:

(a) Bowl air had been consistently clean (0.25MPC) even during welding and grinding activities.

(b) The job was in a high radiation area (300-400 mR/hr) and could be completed more efficiently without respirators.

(c) Engineering controls were in place. These controls were in the form of a HEPA ventilation system rated at 2000 cfm flowing through a small confined area.

(d) There was no posting that required respiratory protection for entry into the bowl.

After the investigation, it was decided to notify the NRC of the incident even though it was not reportable.

3. Corrective Steps Which Have Been Taken

The RC Technician was counseled and trained immediately following the incident. He acknowledged his errors in judgment, in that, he should have known the requirements for that job before allowing the work to be performed in the steam generator bowl. In addition, the lead RC Technician in containment has been given a notebook of containment RWPs to facilitate distribution of information to workers and RC technicians.

4. Corrective Steps Which Will Be Taken

The corrective actions which were taken are considered adequate to avoid further recurrence.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

If you have any questions concerning this response, please contact my staff or me.

Very truly yours,

R. E. Morgan
General Manager
H. B. Robinson SEG Plant

FMC/ml