

CP&L

Carolina Power & Light Company

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ROBINSON NUCLEAR PROJECT DEPARTMENT
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HARTSVILLE, SOUTH CAROLINA 29550

MAR 29 1985

Robinson File No: 13510E

Serial: RNP/85-595

Dr. J. Nelson Grace, Regional Administrator
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W., Suite 3100
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NRC REGION II INSPECTION REPORT 85-09

Dear Dr. Grace:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report. As requested in the cover letter of the subject report, particular attention to the identification and remedy of the root cause of the violation have been included in the following response to preclude its recurrence.

Severity Level IV Violation (RII-85-09-02-SL4)

Technical Specification 6.13 required that locked doors be provided to prevent unauthorized entry into high radiation areas where the radiation intensity exceeds 1000 mR per hour and that keys to these doors be maintained under administrative control of the Shift Foreman and/or Radiation Control Supervisor.

Contrary to the above, on the following occasions, doors to high radiation areas (greater than 1000 mR/hour) were found unlocked.

- (1) On September 10, 1984, and October 25, 1984, the door into the reactor coolant system filter and volume control tank room was found unlocked.
- (2) On October 3, 1984, the covering over drainage openings into the steam generator/reactor pump bays was removed.
- (3) On December 21, 1984, the door into the waste holdup tank room was found unlocked.
- (4) On January 15, 1985, the CVCS tank room door was found open.

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Response

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the violation.

2. Reason for Violation

The examples cited in the statement of violation occurred for several reasons. Some of the major contributing causes which have been identified are:

- o Mechanical failure of doors and locks.
- o A series of occurrences related to Locked High Radiation Areas which revealed a lack of individual self-discipline with regard to complying with radiological postings and procedures.
- o Personnel training deficiencies resulting in inadvertent failure to follow procedure. Specifically, the incident involving the drainage opening covers was an isolated event, and it was concluded that the personnel involved did not realize that they were compromising a Locked High Radiation Area boundary.

3. Corrective Steps Which Have Been Taken and Results Achieved

Several corrective actions have been taken which address the aforementioned causes. These actions are:

- o Disciplinary action has been exercised against individuals known to have disregarded radiological procedures and postings. These actions have been reinforced by Site and Senior Management by communicating to workers that disregard of procedures and postings will not be tolerated. A resulting improvement in worker attitudes towards procedure compliance is now apparent and should continue to improve.
- o Increased emphasis has been placed on training workers on the procedures for entering and exiting Locked High Radiation Areas in the General Employee Training Program (Level II). Regarding the drainage opening cover removal, a memorandum was sent to all Site Managers from Plant Management explaining the incident and discussing appropriate procedure for compromising a Locked High Radiation Area boundary. Moreover, the Radiation Control Supervisor has personally counseled available Radiation Control Technicians on Locked High Radiation Area door controls and procedural requirements.
- o On each shift, a check of the Locked High Radiation Area doors by Radiation Control Technicians has been implemented as part of the routine shift activities. As noted in the inspection report, this has resulted in the timely identification of Locked High Radiation Area door problems, allowing prompt corrective action to be taken.

- o Locked High Radiation Area doors have been re-keyed and a key accountability program is in place to preclude personnel from obtaining unauthorized copies of keys.
- o Mechanical failures of doors or locks are now repaired in a timely manner. In addition, a schedule for replacing the existing Locked High Radiation Area doors with sturdier doors is in place. In keeping with this schedule, the door for the Waste Holdup Tank Room has already been replaced with the new design door.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

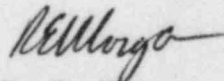
Site and Senior Management remain firm in their commitment to foster a positive worker attitude regarding procedure compliance. Work will continue on the replacement of existing Locked High Radiation Area doors with the new design doors. Thirteen doors are presently scheduled to be replaced by May 31, 1985.

5. Date When Full Compliance Will Be Achieved

Each of the examples of failure to control a Locked High Radiation Area boundary cited in the statement of violation was corrected immediately following identification of the problem. There is no indication that unauthorized personnel entered these areas. The Plant is currently in full compliance with Technical Specification 6.13 and related Plant procedures.

If you have any questions concerning this response, please contact Mr. David C. Stadler at (803) 383-4524, Extension 363.

Very truly yours,



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

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cc: H. E. P. Krug
Document Control Desk