



**Progress Energy**

10 CFR 50, Appendix E

Serial: RNP-RA/03-0060

APR 29 2003

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23

TRANSMITTAL OF EMERGENCY PROCEDURE REVISIONS

Ladies and Gentlemen:

In accordance with 10 CFR 50.4(b)(5) and Appendix E to 10 CFR 50, Progress Energy Carolinas, Inc., also known as Carolina Power and Light Company, is transmitting revisions to H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Emergency Implementing Procedures. The procedure revisions and effective dates are listed in the attachment to this letter.

A description of the procedure changes is provided on the "Summary of Changes" page for the emergency procedures. Please replace the superseded procedures with the enclosed revisions.

If you have any questions concerning this matter, please contact me.

Sincerely,

C. T. Baucom  
Supervisor – Licensing/Regulatory Programs

CAC/cac

Attachment

Enclosures

c: L. A. Reyes, NRC, Region II (2 copies)  
NRC Resident Inspector, HBRSEP  
C. P. Patel, NRC, NRR (w/o Attachment and Enclosures)

Progress Energy Carolinas, Inc.  
3581 West Entrance Road  
Hartsville, SC 29550

A 045

### **Procedure Revisions and Effective Dates**

<b>Procedure</b>	<b>Revision No.</b>	<b>Effective Date</b>
EPCLA-03, "Generic Instructions"	3	04/08/03
EPNOT-04, "TSC NRC Emergency Communicator"	6	04/08/03

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 2

PART 5

**EPCLA-03**

***GENERIC INSTRUCTIONS***

REVISION 3

## SUMMARY OF CHANGES

PRR 86956

STEP #	REVISION COMMENTS
Entire Procedure	Converted to WORD 2000. Formatting changes as required to accommodate WORD.
8.3.3.2	Changed reference to AP-022 to PRO-NGGC-0204.
8.3.3.2.2	Changed procedure control to Plant Support Group.
8.3.4	Added generic statement to replace N/A that there are no records generated by this procedure.

## TABLE OF CONTENTS

SECTION	PAGE
8.3.1 <b>PURPOSE</b> .....	4
8.3.2 <b>RESPONSIBILITIES</b> .....	4
8.3.3 <b>INSTRUCTIONS</b> .....	4
8.3.3.1 Generic Guidance.....	4
8.3.3.2 EAL Development and Maintenance.....	5
8.3.4 <b>RECORDS</b> .....	7
8.3.5 <b>ATTACHMENTS</b> .....	7

### 8.3.1 PURPOSE

1. This procedure provides generic guidance applicable to all sections of EPCLA-00.
2. This procedure provides the requirements for the conduct of the Emergency Action Levels (EALs) Procedure Program. The specific areas controlled by this procedure are EAL Development and Maintenance. (ACR-00429) (CR 99-00828) (CR 99-00766)

### 8.3.2 RESPONSIBILITIES

1. Supervisor-Emergency Preparedness

The Supervisor-Emergency Preparedness is responsible for the implementation of the EAL Maintenance Program. This includes the recommendation of revisions to the EALs and approval of the transition document.

2. Manager-Regulatory Affairs

The Manager-Regulatory Affairs is responsible for approval of all revisions to the EALs.

### 8.3.3 INSTRUCTIONS

#### 8.3.3.1. Generic Guidance

1. Procedure steps which have been previously implemented as the result of earlier classifications need not be repeated unless warranted by changing conditions.

<b>EXAMPLE:</b> Sounding of the site evacuation alarm for both Site Area Emergency and General Emergency.
---

2. To the extent practical, emergency response activities should be accomplished in parallel to expedite notification of off-site agencies.
  - Notifications should be made per EPNOT-00, Notification and Emergency Communications.

#### 8.3.3.1 (Continued)

3. Portions of this procedure may be implemented from the Control Room, Technical Support Center or Emergency Operations Facility.
4. Dynamic situations which arise in an emergency condition may require that steps be performed out of sequence or alternate methods devised to accomplish the intent of the step.
  - a. Deviations which do not violate license requirements may be approved by the SEC or ERM.
  - b. Deviations which violate license requirements shall be implemented per 10 CFR 50.54 (x, y, and z). Time permitting SEC or ERM approval shall also be obtained.

#### 8.3.3.2 EAL Development and Maintenance

1. EAL Development includes the creation of new procedures and the revision of existing procedures. The process involves the following documents that supplement the procedure revision process as defined in PRO-NGGC-0204, Procedure Review and Approval.
  - EPCLA-02, Emergency Action Level Procedure User's Guide.

### 8.3.3.2 (Continued)

2. Upon successful development / corrections of the EALs, copies of the procedure will be mounted or laminated for distribution by the Plant Support Group or Emergency Preparedness. The number and type of EALs to be distributed can be found using NRCS (or its equivalent) or PLP-007. PLP-007 contains single page size reproductions of the EALs. Items to consider when revising the EALs is as follows: (CR 99-00766)
  - The signed copy of the EALs when revised, is printed on Mylar (or equivalent) and sent to Document Control.
  - The EALs are part of the Emergency Plan. When revising the EALs, PLP-007 should also be updated. This will require independent (TWO) safety reviews. The changes will be reviewed by the PNSC per PLP-007.
3. The EAL Transition Document contains the step by step comparison of the EAL to NUREG-0654. It may also include the basis for steps and any associated commitments. The EAL Transition Document contains the justification for the step differences between the EALs and NUREG when differences exist. In addition, the EAL Transition Document may contain any item that increases the understanding of why the EAL appears in its present form. Typical examples of such items include licensing commitments and Plant Management policies. Consider the following material for inclusion into the Transition Document.
  - Licensing commitments.
  - Plant Management directives and policies.
  - NRC and INPO recommendations.
  - Audit commitments, recommendations and observations.
  - Plant operating experience.
  - Industry events.



#### 8.3.3.2 (Continued)

4. The Transition Document should be revised concurrently with the EALs to allow the document to be reviewed with the EAL procedure change package. If the Transition Document cannot be reviewed and approved concurrently with the EAL, it should be processed as soon as reasonably achievable to maintain the EAL supporting documentation current. The EAL Transition Document shall be approved by the Supervisor-Emergency Preparedness.
5. The EAL Maintenance Program ensures the EALs remain current and controls the documentation that supports the plant specific EALs. The program is administered by the Emergency Preparedness (EP) Staff as follows:
  - Comments are provided to the EP Staff via EP Improvement Forms or similar document.
  - Comments are reviewed by a member of the EP Staff for incorporation into the EALs or supporting documents.
  - The reviewer determines if the comment warrants the initiation of a procedure revision or if the comment can be held in the applicable work control data base until it is incorporated in the next procedure revision.
  - The EALs and supporting documents are revised in compliance with the requirements listed in Section 8.3.3.6 of this procedure.

#### 8.3.4 RECORDS

There are no records generated by this procedure.

#### 8.3.5 ATTACHMENTS

N/A

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 2

PART 5

## **EPNOT-04**

# ***TSC NRC EMERGENCY COMMUNICATOR***

REVISION 6

## SUMMARY OF CHANGES

PRR 83007

Step #	Revision Comments
Entire Procedure	Converted to WORD 2000 including necessary formatting changes.
8.4.4	Replaced N/A with the generic statement the procedure does not generate records.

## TABLE OF CONTENTS

SECTION	PAGE
<b>QUICK START GUIDE .....</b>	<b>4</b>
8.4.1 <b>PURPOSE.....</b>	<b>5</b>
8.4.2 <b>RESPONSIBILITIES .....</b>	<b>5</b>
8.4.3 <b>INSTRUCTIONS .....</b>	<b>5</b>
8.4.4 <b>RECORDS .....</b>	<b>6</b>
8.4.5 <b>ATTACHMENTS.....</b>	<b>6</b>
8.4.5.1 <b>Event Notification Worksheet.....</b>	<b>7</b>

## NRC EMERGENCY COMMUNICATOR QUICK START GUIDE

**NOTE:** Blanks are provided for place keeping ✓'s only, logs are the official record.  
This is a summary level guide and does not replace the procedure steps.

1. Sign in. \_\_\_\_\_
2. Check equipment status. \_\_\_\_\_
3. Log on to Electronic Display System (EDS). \_\_\_\_\_
4. Review previous emergency notifications and NRC notifications. \_\_\_\_\_
5. Notify Site Emergency Coordinator (SEC) and EOF Emergency Communicator when ready to assume duties. \_\_\_\_\_
6. Refer to procedure. \_\_\_\_\_

#### **8.4.1 PURPOSE**

1. To provide instructions for notifications by the NRC Emergency Communicator to the Nuclear Regulatory Commission (NRC).

#### **8.4.2 RESPONSIBILITIES**

1. Accurately transmit information to the NRC.

#### **8.4.3 INSTRUCTIONS**

1. Determine the status of NRC notifications with the Control Room.
  - a. If initial contact is required, use Attachment 8.4.5.1, Event Notification Worksheet.
  - b. Information subsequent to initial notifications is typically responding to questions and providing verbal feedback, as such, no specific form is required.
    - Records shall be maintained of responses which require approval by the SEC.
2. Notify the EOF Emergency Communicator and the SEC when you are ready to assume position duties.
3. Obtain SEC approval for information provided on the Event Notification Worksheet and responses to questions which do not contain information already approved for release.
  - a. Information posted on status boards and valid plant data from the Emergency Response Facility Information System (ERFIS) or Electronic Display System (EDS) are approved for release.
  - b. Any question which involves speculation about the future condition of the plant should be directed to appropriate personnel for an "official" response. This shall be approved by the SEC.

#### 8.4.3 (Continued)

4. Establish contact with the NRC.
  - a. Use an Emergency Telecommunication System (ETS) phone and dial the number listed on the sticker on the phone, or
  - b. Meridian phone and number listed in the ERO phone book.
5. Respond to NRC questions and requests with latest available information.
  - a. Keep the EOF Emergency Communicator informed of issues which emerge.
6. Man the phone continuously when requested by the NRC.
7. Verify transmission of Emergency Response Data System (ERDS) data after activation of the system.
  - a. ERDS must be activated within 1 hour of the declaration of an Alert or higher.
8. Notify NRC personnel of drill or event termination as appropriate.

#### 8.4.4 RECORDS

There are no records generated by this procedure.

#### 8.4.5 ATTACHMENTS

- 8.4.5.1 Event Notification Worksheet

NRC FORM 361 COMMISSION (12-2000)				U.S. NUCLEAR REGULATORY OPERATIONS CENTER			
<b>REACTOR PLANT EVENT NOTIFICATION WORKSHEET</b>							
<b>EN #</b>							
NRC OPERATION TELEPHONE NUMBER: PRIMARY – 301-816-5100 or 800-532-3469*, BACKUPS – [1st] 301-951-0550 or 800-449-3694*, [2nd] 301-415-0550 and [3rd] 301-415-0553							
<small>*Licensees who maintain their own ETS are provided these telephone numbers</small>							
NOTIFICATION TIME		FACILITY OR ORGANIZATION		UNIT		NAME OF CALLER	
		H. B. ROBINSON		2			
						CALL BACK # 843-857-	
EVENT TIME & ZONE		EVENT DATE		POWER/MODE BEFORE		POWER/MODE AFTER	
<b>EVENT CLASSIFICATIONS</b>				<b>1-Hr. Non-Emergency 10 CFR 50.72(b)(1)</b>			
GENERAL EMERGENCY		GEN/AAEC		TS Deviation		ADEV	
SITE AREA EMERGENCY		SIT/AAEC		<b>4-Hr. Non-Emergency 10 CFR 50.72(b)(2)</b>			
ALERT		ALE/AAEC		(i) TS Required S/D		ASHU	
UNUSUAL EVENT		UNU/AAEC		(iv)(A) ECCS Discharge to RCS		ACCS	
50.72 NON-EMERGENCY (see next columns)				(iv)(B) RPS Actuation (scram)		ARPS	
PHYSICAL SECURITY (73.71)		DDDD		(xi) Offsite Notification		APRE	
MATERIAL/EXPOSURE		B???		<b>8-Hr. Non-Emergency 10 CFR 50.72(b)(3)</b>			
FITNESS FOR DUTY		HFIT		(ii)(A) Degraded Condition		ADEG	
OTHER UNSPECIFIED REQMT. (see last column)				(ii)(B) Unanalyzed Condition		AUNA	
INFORMATION ONLY		NINF		(iv)(A) Specified System Actuation		AESF	
				<b>60-Day Optional 10 CFR 50.73(a)(1)</b>			
				Invalid Specified System Actuation			
				<b>Other Unspecified Requirement (Identify)</b>			
				NONR			
				NONR			
<b>DESCRIPTION</b>							
Include: Systems affected, actuations and their initiating signals, causes, effect of event on plant, actions taken or planned, etc. (Continue on back)							
NOTIFICATIONS		YES	NO	WILL BE	ANYTHING UNUSUAL OR <input type="checkbox"/> YES (EXPLAIN ABOVE) <input type="checkbox"/> NO		
NRC RESIDENT					NOT UNDERSTOOD?		
STATE(s)					DID ALL SYSTEMS <input type="checkbox"/> YES <input type="checkbox"/> NO		
LOCAL					FUNCTION AS REQUIRED?		
OTHER GOV AGENCIES					MODE OF OPERATION UNTIL CORRECTED		ESTIMATE FOR RESTART DATE.
MEDIA/PRESS RELEASE							ADDITIONAL INFO ON BACK <input type="checkbox"/> YES <input type="checkbox"/> NO



## ATTACHMENT 8.4.5.1

Page 2 of 2

## ADDITIONAL INFORMATION

PAGE 2 OF 2

RADIOLOGICAL RELEASES: CHECK OR FILL IN APPLICABLE ITEMS <i>(specific details/explanations should be covered in event description)</i>							
<input type="checkbox"/> LIQUID RELEASE	<input type="checkbox"/> GASEOUS RELEASE	<input type="checkbox"/> UNPLANNED RELEASE	<input type="checkbox"/> PLANNED RELEASE	<input type="checkbox"/> ONGOING	<input type="checkbox"/> TERMINATED		
<input type="checkbox"/> MONITORED	<input type="checkbox"/> UNMONITORED	<input type="checkbox"/> OFFSITE RELEASE	<input type="checkbox"/> T. S. EXCEEDED	<input type="checkbox"/> RM ALARMS	<input type="checkbox"/> AREAS EVACUATED		
<input type="checkbox"/> PERSONNEL EXPOSED OR CONTAMINATED		<input type="checkbox"/> OFFSITE PROTECTIVE ACTIONS RECOMMENDED			<i>*State release path in description</i>		
	Release Rate (Ci/sec)	% T. S. LIMIT	HOO GUIDE	Total Activity (Ci)	% T. S. LIMIT	HOO GUIDE	
Noble Gas			0.1 Ci/sec			1000 Ci	
Iodine			10 uCi/sec			0.01 Ci	
Particulate			1 uCi/sec			1 mCi	
Liquid (excluding tritium and dissolved noble gases)			10 uCi/min			0.1 Ci	
Liquid (tritium)			0.2 Ci/min			5 Ci	
Total Activity							
	PLANT STACK	CONDENSER/AIR EJECTOR	MAIN STEAM LINE	SG BLOWDOWN	OTHER		
RAD MONITOR READINGS							
ALARM SETPOINTS							
% T. S. LIMIT (if applicable)							
RCS OR SG TUBE LEAKS: CHECK OR FILL IN APPLICABLE ITEMS: <i>(specific details/explanations should be covered in event description)</i>							
LOCATION OF THE LEAK (e.g., SG #, valve, pipe, etc.)							
LEAK RATE	UNITS gpm/gpd	T.S. LIMITS	SUDDEN OR LONG-TERM DEVELOPMENT				
LEAK START DATE	TIME	COOLANT ACTIVITY PRIMARY AND UNITS	SECONDARY				
LIST OF SAFETY RELATED EQUIPMENT NOT OPERATIONAL:							
EVENT DESCRIPTION (continued from front)							
NRC HEADQUARTERS DUTY OFFICER CONTACTED _____ / _____ / _____ AM/PM <div style="display: flex; justify-content: space-around; width: 100%;"> <span>NAME</span> <span>DATE</span> <span>TIME</span> </div>							

EPNOT-04

Rev. 6

Page 8 of 8