



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

September 15, 2006

Carolina Power & Light Company
ATTN: Mr. T. D. Walt
Vice President
H. B. Robinson Steam Electric Plant, Unit 2
3581 West Entrance Road
Hartsville, SC 29550

SUBJECT: NRC INSPECTION REPORT NO. 05000261/2006008

Dear Mr. Walt:

On August 14-18, 2006, the U. S. Nuclear Regulatory Commission (NRC) conducted an inspection at your H. B. Robinson Steam Electric Plant, Unit 2. The enclosed inspection report documents the inspection findings, which were discussed on August 18, 2006, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspector reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this letter, please contact us.

Sincerely,

/RA/

Brian R. Bonser, Chief
Plant Support Branch 2
Division of Reactor Safety

Docket No. 50-261
License No. DPR-23

Enclosure: (See page 2)

Enclosure: NRC Inspection Report 0500261/2006008
w/Attachment: Supplemental Information

cc w/encl:

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ATTN: Mr. T. D. Walt
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Docket No. 50-261
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Enclosure: (See page 2)

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NAME	DESAI	BONSER	KREH				
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E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos: 50-261

License No: DPR-23

Report No: 05000261/2006008

Licensee: Carolina Power & Light Company

Facility: H. B. Robinson Steam Electric Plant, Unit 2

Location: 3581 West Entrance Road
Hartsville, SC 29550

Dates: August 14-18, 2006

Inspector: J. Kreh, Emergency Preparedness Inspector

Approved by: Brian R. Bonser, Chief
Plant Support Branch 2
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000261/2006008; 08/14-18/2006; H. B. Robinson Steam Electric Plant, Unit 2;
Emergency Preparedness Baseline Inspection

This report covers an announced inspection conducted by a Region II emergency preparedness inspector. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations.

None

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP2 Alert and Notification System (ANS) Testing

a. Inspection Scope

The inspector evaluated the adequacy of licensee methods for testing the alert and notification system in accordance with NRC Inspection Procedure 71114, Attachment 02, "Alert and Notification System Testing." The applicable planning standard 10 CFR 50.47(b)(5) and related requirements contained in Section IV.D of Appendix E to 10 CFR Part 50 were used as reference criteria. The evaluation criteria contained in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1; and Federal Emergency Management Agency (FEMA) Report REP-10, "Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants" were also applied. This inspection activity represents one sample on a biennial cycle.

The inspector reviewed various documents which are listed in the Attachment to this report.

b. Findings

No findings of significance were identified.

1EP3 Emergency Response Organization (ERO) Augmentation

a. Inspection Scope

The inspector reviewed the ERO augmentation staffing requirements and the process for notifying ERO personnel to ensure the readiness of key staff for responding to an event and the capability for timely facility activation. The results of periodic ERO communications drills were reviewed. The inspector examined the provisions for a backup notification system. A sample of problems identified from augmentation drills and ERO pager system tests was reviewed to assess the effectiveness of corrective actions.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 03, "Emergency Response Organization Augmentation." The applicable planning standard 10 CFR 50.47(b)(2) and related requirements contained in Appendix E to 10 CFR Part 50 were used as reference criteria. This inspection activity represents one sample on a biennial cycle.

The inspector reviewed various documents which are listed in the Attachment to this report.

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level (EAL) and Emergency Plan Changes

a. Inspection Scope

The inspector reviewed the Emergency Plan changes for Revisions 59 and 60 (the latter was the version in effect at the time of the inspection). The EAL modifications made in Revision 60 to address NRC Bulletin 2005-02 were reviewed in detail.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 04, "Emergency Action Level and Emergency Plan Changes." The applicable planning standard 10 CFR 50.47(b)(4) and related requirements contained in 10 CFR 50.54(q) and Appendix E to 10 CFR Part 50 were used as reference criteria. This inspection activity represents one sample on an annual cycle.

The inspector reviewed various documents which are listed in the Attachment to this report.

b. Findings

Introduction. The inspector determined that there were several inconsistencies between the EALs in PLP-007, Robinson Emergency Plan, Revision 60, and the EAL guidance provided in NUREG-0654, Appendix 1, Revision 1, which nominally comprises the basis for the licensee's emergency classification scheme. Further NRC review and internal agency discussions will be required to determine whether the changes made over time have resulted in a "blending" of NUREG-0654 and NUMARC/NESP-007 EAL schemes in the licensee's emergency classification methodology, and to determine whether such changes constitute decreases in the effectiveness of the licensee's Emergency Plan.

This is categorized as an unresolved item (URI) pending completion of further NRC staff review.

Description. The inspector noted differences between the formally approved and the current versions of the NUREG-0654-based emergency classification scheme or EALs contained in the Robinson Emergency Plan. The inspector preliminarily determined that most of the differences appeared to be attributable to changes based on the NRC staff guidance contained in EPPOS [Emergency Preparedness Position] -1, dated June 1, 1995. EPPOS-1 was intended to provide guidance to the NRC staff regarding the acceptability of incorporating selected NUMARC/NESP-007 EALs (including both deletions and changes allowed by the NUMARC/NESP-007 methodology) into a NUREG-0654-based classification scheme. The NRC's intention was that licensees wishing to adopt changes listed in EPPOS-1 would request prior NRC approval for such changes. Further NRC review will be required to determine the extent of condition and how to disposition this potential finding.

Analysis. This potential finding affects the Emergency Preparedness Cornerstone and is considered to be more than minor because the Emergency Preparedness attribute of procedure quality was affected. This, in turn, affects the Emergency Preparedness objective of ensuring that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. Due to the nature of this issue (affecting the regulatory process), traditional enforcement would be applied instead of the Significance Determination Process (SDP).

Enforcement. 10 CFR 50.54(q) states, in part, that the licensee may make changes to emergency plans without Commission approval only if the changes do not decrease the effectiveness of the plans, and the plans, as changed, continue to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. Section IV.B of Appendix E states, in part, that a revision to an EAL must be approved by the NRC before implementation if the licensee is changing from one EAL scheme to another EAL scheme (e.g., a change from an EAL scheme based on NUREG-0654 to one based on NUMARC/NESP-007 or NEI 99-01).

Proposed changes that decrease the effectiveness of the approved Emergency Plan may not be implemented without application to and approval by the Commission. The licensee made changes to its Emergency Plan which appeared to reduce the effectiveness of the Plan and appeared to be inconsistent with NUREG-0654 EAL scheme, and to utilize an alternative EAL scheme. These changes were not submitted to the NRC for approval prior to implementation. Pending further NRC review necessary to provide the proper scope regarding the significance of the blending of the EAL schemes and EAL changes that were made to the Robinson Emergency Plan, this finding is identified as URI 05000261/2006008-001, Blending of EAL Schemes.

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

a. Inspection Scope

The inspector reviewed the corrective actions identified through the emergency preparedness program in an effort to ascertain the significance of the issues and to determine whether repetitive problems were occurring. The facility's self-assessments and audits were reviewed to assess the licensee's ability to be self-critical, thus avoiding complacency and degradation of its emergency preparedness program. In addition, the inspector reviewed the licensee's self-assessments and audits to assess the completeness and effectiveness of a sample of emergency preparedness-related corrective actions. Documentation of all emergency declarations since the December 2004 inspection was reviewed in detail.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 05, "Correction of Emergency Preparedness Weaknesses and Deficiencies." The applicable planning standard 10 CFR 50.47(b)(14) and related requirements contained in Appendix E to 10 CFR Part 50 were used as reference criteria. This inspection activity represents one sample on a biennial cycle.

The inspector reviewed various documents which are listed in the Attachment to this report.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspectors reviewed the licensee's procedure for developing the data for the Emergency Preparedness PIs, which are: (1) Drill and Exercise Performance (DEP); (2) ERO Drill Participation; and (3) Alert and Notification System (ANS) Reliability. The inspectors examined data reported to the NRC for the five-quarter period April 1, 2005 to June 30, 2006. Procedural guidance for reporting PI information and records used by the licensee to identify potential PI occurrences were also reviewed. The inspectors verified the accuracy of the PI for ERO DEP through review of a sample of drill and event records. The inspectors reviewed selected training records to verify the accuracy of the PI for ERO drill participation for personnel assigned to key positions in the ERO. The inspectors verified the accuracy of the PI for ANS reliability through review of a sample of the licensee's records of periodic system tests.

The inspection was conducted in accordance with NRC Inspection Procedure 71151, "Performance Indicator Verification." The applicable planning standard 10 CFR 50.9 and NEI 99-02, "Regulatory Assessment Performance Indicator Guidelines," Revisions 3 and 4, were used as reference criteria. This inspection activity represents three samples on an annual cycle.

The inspectors reviewed various documents which are listed in the Attachment to this report.

b. Findings

No findings of significance were identified.

4OA6 Meetings, including Exit

On August 18, 2006, the inspector presented the inspection results to Mr. T. Walt, Vice President, and other members of his staff who acknowledged the findings. The inspector stated that additional information may be requested relative to the URI discussed in Section 1EP4.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

C. Baucom, Licensing Supervisor
B. Clark, Manager, Nuclear Assessment Section
E. Kapopoulos, Plant General Manager
J. Lucas, Manager, Support Services - Nuclear
G. Ludlam, Manager, Training
W. Noll, Director, Site Operations
T. Tovar, Radiation Control Superintendent
T. Walt, Vice President
S. Wheeler, Supervisor, Emergency Preparedness

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000261/2006008-01	URI	Blending of EAL Schemes. (Section 1EP4)
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Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Section 1EP2: Alert and Notification System Testing

Procedures

EPPRO-2, Maintenance and Testing, Revision 24
EPPRO-7, Operation and Maintenance of the Alert and Notification System Revision 1

Records and Data

Documentation of 2005 Telecom preventive maintenance (per Attachment 10.3 of EPPRO-7)
Documentation of 2005-2006 siren mechanical and electrical preventive maintenance
(per Attachment 10.4 of EPPRO-7)
Siren system availability test records for January 2005 through July 2006

Section 1EP3: Emergency Response Organization (ERO) Augmentation

Procedures

EPPRO-2, Maintenance and Testing, Revision 24

Records and Data

Documentation of ERO Communications Drills conducted 01/25/2005, 04/26/2005, 0728/2005,
11/10/2005, 02/07/2006, 05/23/2006

Section 1EP4: Emergency Action Level (EAL) and Emergency Plan Changes

Plans and Procedures

Robinson Emergency Plan, Revision 59
Robinson Emergency Plan, Revision 60
EPCLA-02, Emergency Action Level User's Guide, Revision 14

Records and Data

10 CFR 50.54(q) Emergency Preparedness Program Evaluation for Revision 59
10 CFR 50.54(q) Emergency Preparedness Program Evaluation for Revision 60
10 CFR 50.54(q) Emergency Preparedness Program Evaluation for EAL-1 (Rev. 14) and EAL-2
(Revision 20)

Section 1EP5: Correction of Emergency Preparedness Weaknesses and Deficiencies

Procedures

CAP-NGGC-0200, Corrective Action Program, Revision 17

Audits and Self-Assessments

NAS Report File No. R-EP-05-01, Robinson Nuclear Plant Emergency Preparedness Assessment Report

NAS Report File No. R-EP-06-01, Robinson Nuclear Plant Emergency Preparedness Assessment Report

Self-Assessment Report No. 141652, RASCAL Implementation at Robinson Nuclear Plant

Self-Assessment Report No. 141648, Cross-Functional Self-Assessment of the Robinson Emergency Plan and Implementation Procedures

Self-Assessment Report No. 176155, Emergency Plan and Implementing Procedures

Records and Data

Documentation packages (scenario/time line/drill notification forms/critique report) for ERO drill on 11/08/2005

Documentation packages (Control Room log/event time line/event notification forms/critique report/NCRs) for Notification of Unusual Event declaration on 12/27/2004

Nuclear Condition Reports (NCRs)

147116, KPI for ANS is Red

147577, 2004 DEP Performance Indicator rollup

148132, Dialogic modem failure

153054, DEP Performance Indicator data

154529, Drill press release deficiencies

154999, Accident monitoring protocols for failed fuel indications

155072, Misinterpretation of EAL-1 by drill participants

155074, Problems with preparation of emergency notification forms

155075, Training on EPPRO-7, Revision 0

155885, Radiation Control/Operations interface in the Operational Support Center

156492, Alert declaration not made during the 04/12/2005 drill

159007, Confirmation received on inadvertent siren activation

175529, Emergency notification form errors during drill

195550, Call collisions during 05/23/2006 communications drill

195551, ERO personnel called to fill more than one ERO position

198228, ERO communications and equipment failures and alarms

198661, Siren system alarm increase

198849, Communication between the met tower and siren computer lost

Section 40A1: Performance Indicator (PI) Verification

Records and Data

Siren System Availability Test Records for April 2005 - June 2006

Documentation (scenario/time line/event notification forms/critique report) for ERO drill on 11/08/2005

Documentation of DEP Opportunities from Operations Simulator evaluations on 04/04/2005, 11/17/2005, 11/22/2005, 11/30/2005, 12/07/2005, 03/01/2006, 05/31/2006

Records of drill and exercise participation by selected key ERO personnel in 2005

LIST OF ACRONYMS AND INITIALISMS

ANS	Alert and Notification System
DEP	Drill and exercise performance
EAL	Emergency Action Level
EPPO	Emergency Preparedness Position
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
NAS	Nuclear Assessment Section
PI	Performance Indicator
SDP	Significance Determination Process
URI	Unresolved Item