



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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

July 15, 2008

Carolina Power and Light Company
ATTN: Mr. Tom Walt
Vice President
H. B. Robinson Steam Electric Plant, Unit 2
3851 West Entrance Road
Hartsville, SC 29550

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT - NRC EMERGENCY
PREPAREDNESS INSPECTION REPORT 05000261/2008501

Dear Mr. Walt:

On June 19, 2008, the U.S. Nuclear Regulatory Commission (NRC) completed an Emergency Preparedness inspection at H. B. Robinson Steam Electric Plant. The enclosed inspection report documents the inspection results, which were discussed on June 19, 2008, 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 inspectors 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).

Sincerely,

/RA/

Brian R. Bonser, Chief
Plant Support Branch 1
Division of Reactor Safety

Docket Nos. 50-261
License Nos. DPR-23

Enclosure: NRC Inspection Report No. 05000261/2008501
w/Attachment: Supplemental Information

cc w/encl: (See Page 2)

July 15, 2008

Carolina Power and Light Company
ATTN: Mr. Tom Walt
Vice President _ Robinson Plant
H. B. Robinson Steam Electric Plant
Unit 2
3851 West Entrance Road
Hartsville, SC 29550

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT - NRC EMERGENCY
PREPAREDNESS INSPECTION REPORT 05000261/2008501

Dear Mr. Walt:

On June 19, 2008, the U.S. Nuclear Regulatory Commission (NRC) completed an Emergency Preparedness inspection at Browns Ferry Nuclear Power Plant. The enclosed inspection report documents the inspection results, which were discussed on June 19, 2008, 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 inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Based on the results of this inspection, no findings of significance were identified.

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cc w/encl: page 2

*See Previous Concurrence

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ADAMS: Yes ACCESSION NUMBER: _____

OFFICE	RII: DRS	RII:DRP	RII:DRS				
SIGNATURE	BBonser /RA/ for	/RA/	/RA/				
NAME	L. Miller	R. Musser	B. Bonser				
DATE	7/ /2008	07/15/08	07/15/08				
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

cc w/encl:
Eric McCartney
Director Site Operations
Carolina Power & Light Company
Electronic Mail Distribution

Ernest J. Kapopoulos, Jr.
Plant General Manager
Carolina Power & Light Company
Electronic Mail Distribution

Paul Fulford
Manager
Performance Evaluation and Regulatory
Affairs PEB5
Carolina Power & Light Company
Electronic Mail Distribution

C. A. Castell
Supervisor
Licensing/Regulatory Programs
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant
3581 West Entrance Road
Hartsville, SC 29550

C. T. Baucom
Manager
Support Services - Nuclear
Carolina Power & Light Company
Electronic Mail Distribution

Susan E. Jenkins
Assistant Director, Division of Waste
Management
Bureau of Land and Waste Management
Department of Health and Environmental
Control
Electronic Mail Distribution

R. Mike Gandy
Division of Radioactive Waste Mgmt.
S.C. Department of Health and
Environmental Control
Electronic Mail Distribution

Beverly O. Hall
Chief, Radiation Protection Section
Department of Environmental Health
N.C. Department of Environment and
Natural Resources
Electronic Mail Distribution

David T. Conley
Associate General Counsel
Legal Dept.
Progress Energy Service Company, LLC
Electronic Mail Distribution

John H. O'Neill, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, NW
Washington, DC 20037-1128

Chairman
North Carolina Utilities Commission
Electronic Mail Distribution

Robert P. Gruber
Executive Director
Public Staff - NCUC
4326 Mail Service Center
Raleigh, NC 27699-4326

Public Service Commission
State of South Carolina
P.O. Box 11649
Columbia, SC 29211

S. D. West
Superintendent Security
H. B. Robinson Steam Electric Plant
Progress Energy
Electronic Mail Distribution

Senior Resident Inspector
Carolina Power and Light Company
H. B. Robinson Steam Electric Plant
U.S. NRC
2112 Old Camden Rd
Hartsville, SC 29550

Letter to Thomas D. Walt from Brian Bonser dated July 15, 2008

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT - NRC INTEGRATED
INSPECTION REPORT 05000261/2008

Distribution w/encl:

RIDSNRRDIRS

PUBLIC

M. Vaaler, NRR (PM – Harris and Robinson)

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos: 50-261

License Nos: DPR-23

Report Nos: 05000261/2008501

Licensee: Carolina Power & Light Company

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

Location: Hartsville, SC

Dates: June 16 - 19, 2008

Inspector: Lee Miller, Senior Emergency Preparedness Inspector

Approved by: Brian R. Bonser, Chief
Plant Support Branch 1
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000261/2008-501; 06/16-19/2008; H.B. Robinson Steam Electric Plant, Unit 2; Emergency Preparedness Baseline Inspection.

The report covered an announced inspection by one 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."

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations.

None

Enclosure

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP2 Alert and Notification System Testing

a. Inspection Scope

The inspector evaluated the adequacy of the licensee's methods for testing the alert and notification system in accordance with NRC Inspection Procedure 71114, Attachment 02, "Alert and Notification System Evaluation". The applicable planning standard 10 CFR Part 50.47(b)(5) and its related 10 CFR Part 50, Appendix E, Section IV.D requirements were used as reference criteria. The 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, was also used as a reference.

The inspector reviewed various documents which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the alert and notification system on an biennial basis.

b. Findings

No findings of significance were identified.

1EP3 Emergency Response Organization Augmentation

a. Inspection Scope

The inspector reviewed the licensee's Emergency Response Organization (ERO) augmentation staffing requirements and process for notifying the ERO to ensure the readiness of key staff for responding to an event and timely facility activation. The qualification records of key position ERO personnel were reviewed to ensure all ERO qualifications were current. A sample of problems identified from augmentation drills or system tests performed since the last inspection were reviewed to assess the effectiveness of corrective actions.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 03, "Emergency Response Organization Staffing and Augmentation System." The applicable planning standard, 10 CFR 50.47(b)(2) and its related 10 CFR 50, Appendix E requirements were used as reference criteria.

The inspector reviewed various documents which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the ERO staffing and augmentation system on a biennial basis.

Enclosure

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

Since the last NRC inspection of this program area, Revisions 65, 66, and 67 of the Robinson Emergency Plan was implemented based on the licensee's determination, in accordance with 10 CFR 50.54(q), that the changes resulted in no decrease in the effectiveness of the Plan, and that the revised Plan continued to meet the requirements of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. The inspector conducted a sampling review of the Plan changes and implementing procedure changes made between September 2007 and June 2008 to evaluate for potential decreases in effectiveness of the Plan. However, this review was not documented in a Safety Evaluation Report and does not constitute formal NRC approval of the changes. Therefore, these changes remain subject to future NRC inspection in their entirety.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 04, "Emergency Action Level and Emergency Plan Changes." The applicable planning standard (PS), 10 CFR 50.47(b)(4) and its related 10 CFR 50, Appendix E requirements were used as reference criteria.

The inspector reviewed various documents which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the EAL and emergency plan changes on an annual basis.

b. Findings

No findings of significance were identified.

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

a. Inspection Scope

The inspector reviewed the corrective actions identified through the EP program to determine the significance of the issues and to determine if repeat 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 their EP program. In addition, inspector reviewed licensee's self-assessments and audits to assess the completeness and effectiveness of all EP-related corrective actions.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 05, "Correction of Emergency Preparedness Weaknesses." The applicable planning standard, 10 CFR 50.47(b)(14) and its related 10 CFR 50, Appendix E requirements were used as reference criteria.

The inspector reviewed various documents which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the correction of emergency preparedness weaknesses on a biennial basis.

Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

a. Inspection Scope

Cornerstone: Emergency Preparedness

The inspector sampled licensee submittals for three Performance Indicators (PI) listed below. For each of the submittals reviewed, the inspector reviewed the period from March 2007 through March 2008. To verify the accuracy of the PI data reported during that period, PI definitions and guidance contained in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Indicator Guideline," Revision 5, were used to verify the basis in reporting for each data element.

- Emergency Response Organization Drill/Exercise Performance (DEP)
- Emergency Response Organization Readiness (ERO)
- Alert and Notification System Reliability (ANS)

The inspectors reviewed portions of the raw PI data developed from monthly performance indicator reports and discussed the methods for compiling and reporting the PIs with cognizant emergency preparedness personnel. The inspector also independently screened drill and exercise opportunity evaluations, drill participation reports, and drill evaluations. Selected reported values were calculated to verify their accuracy. The inspectors compared graphical representations from the most recent PI report to the raw data to verify that the data was correctly reflected in the report. Reviewed documents are listed in the Attachment to this report.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

.1 (Closed) NRC Temporary Instruction (TI) 2525/175, Emergency Response Organization, Drill/Exercise Performance Indicator, Program Review

The inspector completed Temporary Instruction TI 2515/175, Emergency Response Organization, Drill/Exercise Performance Indicator, Program Review. Appropriate documentation of the results was provided to NRC, HQ, as required by the TI.

This completes the Region II inspection requirements for this TI for H.B. Robinson Steam Electric Plant, Unit 2.

4OA6 Meetings, including Exit

On June 19, 2008, the lead inspector presented the inspection results to Mr. R. West and other members of your staff. The inspector confirmed that proprietary information was not provided during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

T. Walt, Site Vice President
E. Kapopoulos, Plant General Manager
D. Gardner, Shift Superintendent Operations
S. Wheeler, Supervisor Emergency Preparedness
J. Lucas, Manager - Nuclear Assessment Section
T. Bonnette, Emergency Preparedness
T. Pilo, Emergency Preparedness - Corporate
G. Sanders, Licensing

LIST OF DOCUMENTS REVIEWED

1EP2 Alert and Notification System Testing

Procedures and Documentation

190-08-071204-01, Robinson Nuclear Plant EPZ Siren Acoustic Study, Rev. 1
WPS-2900 Series High Power Voice & Siren System - Operating and Troubleshooting Manual
EPPRO-07, Operation and Maintenance of the Alert and Notification System, Rev. 5
EPPRO-02, Maintenance and Testing, Rev. 29
Robinson Nuclear Plant siren replacement project information 2006-2008

Records and Data

Siren mechanical and electrical preventive maintenance package for 2006
Siren electrical preventive maintenance package for 2007

Corrective Actions - Action Request (AR)

283438, Siren PM Program contained inaccurate acceptance criteria
283445, Revise EPPRO-02 to allow immediate activation of sirens from another control point

1EP3 Emergency Response Organization Augmentation

Procedures

EPPRO-03, Training and Qualification, Rev. 24
EPPRO-06, Operation and Maintenance of the Dialogic System, Revision 2

Records and Data

Unannounced Augmentation Drill package, September 5, 2006

Enclosure

Quarterly Communications test, May 6, 2008
Quarterly Communications test, February 20, 2008
Quarterly Communications test, 1st Quarter 2006 to 4th Quarter 2007

Corrective Actions - Action Request (AR)

283866, Six-year plan look-ahead
283869, Simulator WEBEOC archiving not consistently performed
283870, Simulated control cells for AO communicator for DEP PI
283868, Provide additional guidance in EPPRO-04 for simulator DEP

1EP4 Emergency Action Level and Emergency Plan Changes

Procedures

REG-NGGC-0010, 10 CFR 50.59 and Selected Regulatory Reviews, Rev. 11

E-Plan Changes

Change package for PLP-007, Robinson Emergency Plan, Rev. 65, 66, and 67
Change package for EPCLA-01, Emergency Control, Rev. 21, 22, 23, and 24
Change package for EPCLA-02, EAL Users Guide, Rev. 14
Change package for EPPRO-01, Program and Responsibilities, Rev. 21, 22, 23, and 24
Change package for EPEO-01, Emergency Response Manager, Rev. 10, 11,12, and 13
Change package for EPRAD-03, Dose Projections, Rev. 19 and 20

Corrective Actions - Action Request (AR)

283816, Change to EP procedures without a 10 CFR 50.54(q)

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

Procedures

Audits and Self-Assessments

R-EP-06-01, Robinson Nuclear Plant Emergency Preparedness Assessment Report
R-EP-07-01, Robinson Nuclear Plant Emergency Preparedness Assessment Report
R-EP-08-01, Robinson Nuclear Plant Emergency Preparedness Assessment Report
Cross-Functional Self-Assessment of E-Plan (176155), June 16- July 23, 2006
Self-Assessment of ERO Training Program (176147), July 31- August 3, 2006

Records and Data

Drill Package for November 5, 2007
Drill Package for October 29, 2007
Drill Package for May 24, 2007 Health Physics and medical emergency Drill
Drill Package for January 15, 2007

Corrective Actions - Action Request (AR)

178839, Recommended changes to improve accountability practices.
 205173, Determine requirements for camera in TSC.
 132480, Robinson Emergency Plan incorrectly describes operation of Continuous Air Monitors
 242092, Use of an unqualified drill controller
 252533, Confusion during drill on determination of an emergency release
 252534, PAR notification time not met
 252568, Scenario development issue with Rascal developed data
 283703, RNP NAS Performance of 10 CFR 50.54(t)
 283871, EP surveillances and grace periods

OA1 Performance Indicator VerificationProcedures

EPPRO-04, EP Performance Indicators, Rev. 13
 REG-NGGC-009, NRC Performance Indicators and Monthly Operating Report Data, Rev. 5

Records and DataCorrective Actions - Problem Evaluation Report (PER)

283867, Add "First Voice Contact" to ENF (Att 10.1) and guidance to record notification time

LIST OF ACRONYMS

ANS	Alert and Notification System (ANS) Testing
DEP	Emergency Response Organization Drill/Exercise Performance
EAL	Emergency Action Level
ERO	Emergency Response Organization
NEI	Nuclear Energy Institute
PI	Performance Indicator
PS	Planning Standard
TI	Temporary Instruction