



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
SAM NUNN ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW, SUITE 23T85  
ATLANTA, GEORGIA 30303-8931

October 2, 2009

Mr. Eric McCartney  
Vice President  
Carolina Power and Light Company  
H.B. Robinson Steam Electric Plant Unit 2  
3581 West Entrance Road  
Hartsville, SC 29550

**SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT, NOTIFICATION OF INSPECTION  
AND REQUEST FOR INFORMATION**

Dear Mr. McCartney:

During the period of November 16-20, 2009, the NRC will perform the baseline Occupational Radiation Safety Cornerstone Inspection Procedure 71121.01, Access Controls to Radiologically Significant Areas at Robinson. In addition, the NRC will also perform sections of Inspection Procedure 71151, Performance Indicator Verification as it applies to radiation safety during the inspection period. Experience has shown that this inspection is resource intensive both for the NRC inspectors and your staff.

In order to minimize the impact to your on-site resources and to ensure a productive inspection, we have enclosed a request for documents needed for this inspection. It is important that all of these documents are up-to-date and complete, in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection. We request that the requested information be provided to our staff by November 2, 2009. An address to which the information, preferably on CD, can be sent is provided on the enclosed document request.

We have discussed the schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be Garrett Sanders of your organization. If there are any questions about this inspection or the material requested, please contact the inspector, Heather J. Gepford at (404) 562-4659.

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: Robinson Steam Electric Plant, Notification of Inspection and Request for Information

cc w/encl.: (See page 3)

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PUBLICLY AVAILABLE

NON-PUBLICLY AVAILABLE

SENSITIVE

NON-SENSITIVE

ADAMS:  Yes ACCESSION NUMBER: \_\_\_\_\_

SUNSI REVIEW COMPLETE

OFFICE	RII:DRS	RII:DRS	RII:DRP					
SIGNATURE	HJG /RA/	BRB /RA/	JGW /RA for/					
NAME	HGepford	BBonser	RMusser					
DATE	09/30/2009	10/02/2009	10/02/2009					
E-MAIL COPY?	YES	NO	YES	NO	YES	NO	YES	NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DRS\INPSB1\INFORMATION REQUEST LETTERS\ROBINSON\ROBINSON DOC  
REQUEST LETTER (IR 09-05).DOC

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4

Letter to Eric McCartney from Brian Bonser October 2, 2009

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT, NOTIFICATION OF INSPECTION  
AND REQUEST FOR INFORMATION

Distribution w/encl:

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## **Pre-Inspection Document Request**

Public Radiation Safety Cornerstone

Licensee: Robinson Steam Electric Plant  
Docket Number(s): 50-261

Inspection Dates: November 16-20, 2009:

71121.01 Access Control to Radiologically Significant Areas  
71151 Performance Indicator Verification (Occupational and Public Radiation Safety Cornerstones)

The most recent inspection for inspection procedures 71121.01 and 71151 was October 2008.

Documentation is requested from the date of the previous inspection of a given area to the present. We would prefer as much of the information as possible in electronic form. An index to the CD contents is also helpful. For those items requesting a list of documents/areas, the inspector will select documents/areas from the list for on-site review.

If you have any questions, please call Heather Gepford at 404-562-4659. Thank you in advance for all your effort in putting together this material.

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### Assistance Requested During On-Site Inspection

- Identification of work activities during the inspection for inspector observations, including notification of pre-job briefings.
- Health physics assistance in plant walk-downs assessing access control, e.g. verifying the posting and locking of entrances to locked-high radiation areas and very high radiation areas, and spent fuel pool controls.
- Walk-down of the ISFSI.

### General Information Request

1. Telephone numbers of contacts
2. Plant, Radiation Protection organizational charts
3. List of radiation protection procedures
4. Corrective Action Program procedures
5. Audits and self-assessments performed since October 2008 encompassing the areas of (1) radiation protection, (2) access control to radiologically significant areas, and (3) ISFSI.

### 71121.01 Access Control to Radiologically Significant Areas

1. Site and corporate procedures associated with the access control program. Procedures should include:
  - Radiological surveys, postings, and radiation control barricades
  - Security and control of high radiation sources/objects stored in pools
  - Radiation Work Permits

Enclosure

- Radiological Job-Coverage
  - Controlling access to High Radiation Areas (HRAs), High Dose Rate High Radiation Areas (HDR-HRAs), and Very High Radiation Areas (VHRAs)
  - Key controls for all high radiation areas
  - Radioactive material control, including contamination and hot particles
  - Dosimetry monitoring (electronic dosimeters, multi-badging, etc.)
  - Calculations of internal exposures
2. List of the 10 most exposure significant work areas within radiation areas, high radiation areas (<1R/hr), or airborne radioactivity areas in the plant. This may include areas with low dose rates but high collective dose. Identify any high radiation areas with significant dose rate gradients (factor of 5 or more), including underwater diving activities.
3. List or map of HRAs, LHRAs, HDR-HRAs (>25 rem in one hour @ 30 cm), and VHRAs. Include areas with the potential to become a HRA during routine operations or outages.
4. RWPs for the 5 highest dose rate areas or tasks; RWPs for airborne areas.
5. Internal and skin dose assessments, including calculations, for any internal exposures greater than 10 mrem CEDE or skin doses greater than 500 mrem since October 2008.
6. List of corrective action reports generated since October 2008 related to access controls, including the following:
  - Access controls, including high radiation area radiological incidents
  - Radiological events caused by radiation worker errors
  - Radiological events caused by radiation protection technician errors

#### Operation of an ISFSI (to be evaluated using IP 71121.01)

1. Procedures associated with the ISFSI facility. Procedures should include:
  - Radiological surveys, postings, and radiation control barricades.
  - Environmental monitoring (including TLDs).
  - Loading of casks.
  - Routine activities.
2. Radiation surveys of the ISFSI since October 2008.
3. ALARA reviews and planning and associated RWPs for cask loading activities.
4. Environmental monitoring results (e.g. TLDs).
5. Radiological records for the loading of casks since October 2008.
6. Records of contamination incidents since October 2008.
7. List of corrective action reports related to the ISFSI with respect to radiation protection (i.e. access controls, ALARA, contamination, radiation levels, etc.) since October 2008.

#### 71151 Performance Indicator (PI) Verification

1. Procedure(s) for identifying, notification, tracking, and correcting PI occurrences.
2. Monthly PI reports since October 2008, and copies of associated PERs for Occupational Exposure Control Effectiveness and RETS/ODCM Radiological Effluent occurrences.
3. List of all corrective action documents since October 2008 using keywords such as: HRA, LHRAs, VHRA, unintended dose, unlocked door, etc.
4. List of all dose rate alarms >1 R/hr and dose alarms since October 2008.

#### Mailing Address

#### Inspector Contact Information:

Heather J. Gepford  
 (404) 562-4659  
 Heather.Gepford@nrc.gov

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