



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

February 26, 2010

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: ROBINSON NUCLEAR PLANT NOTIFICATION OF INSPECTION AND
REQUEST FOR INFORMATION

Dear Mr. McCartney:

During the periods of April 19-23, 2010, and May 10-14, 2009, the NRC will conduct baseline radiation safety inspection activities at the Robinson Nuclear Plant. The inspection will evaluate activities in the Occupational Radiation Safety cornerstone using NRC Inspection Procedures (IP) 71124.01, 71124.02, 71124.03, and 71124.08, focusing on radiation protection activities associated with radiological hazard assessment and exposure controls, ALARA, radioactive solid waste processing, and radioactive material handling, storage, and transportation. The inspection will also review the occupational and public radiation safety performance indicators using IP 71151.

This will be the first time that IPs 71124.01, 71124.02, 71124.03, and 71124.08, implemented January 1, 2010, are performed at Robinson. 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, thereby minimizing the number of additional documents requested during the preparation and/or the onsite portions of the inspection. The inspector has requested that the subject informational material be made available to the NRC staff by April 1, 2010, to allow preparation for the inspection.

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 lead inspector, Heather 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.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

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

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

Enclosure: Robinson Nuclear Plant, Notification of Inspection and Request for Information

cc w/encl.: (See page 3)

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OFFICE	RII:DRS	RII:DRS					
SIGNATURE	HJG /RA/	BRB /RA/					
NAME	HGepford	BBonser					
DATE	02/26/2010	02/26/2010					
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DRSII\PSB1\INFORMATION REQUEST LETTERS\ROBINSON\ROBINSON DOC REQUEST LETTER - RHAZ ALARA AIRBORNE SHIPPING (IR 10-03).DOC

cc w/encl:

Eric McCartney
Vice President
H. B. Robinson Steam Electric Plant Unit 2
Carolina Power & Light Company
Electronic Mail Distribution

R. J. Duncan, II
Vice President
Nuclear Operations
Carolina Power & Light Company
Electronic Mail Distribution

Brian C. McCabe
Manager, Nuclear Regulatory Affairs
Progress Energy Carolinas, Inc.
Electronic Mail Distribution

Christos Kamilaris
Director
Fleet Support Services
Carolina Power & Light Company
Electronic Mail Distribution

Curt A. Castell
Supervisor
Licensing/Regulatory Programs
Carolina Power & Light Company
Electronic Mail Distribution

B. C. White
Manager
Support Services - Nuclear
Carolina Power & Light Company
Electronic Mail Distribution

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

Joseph W. Donahue
Vice President
Nuclear Oversight
Carolina Power and Light Company
Electronic Mail Distribution

Chairman
North Carolina Utilities Commission
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

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

Scott Saunders
Plant General Manager
Carolina Power & Light Company
Electronic Mail Distribution

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

W. Lee Cox, III
Section Chief
Radiation Protection Section
N.C. Department of Environmental
Commerce & Natural Resources
Electronic Mail Distribution

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

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

CP&L

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Letter to Eric McCartney from Brian Bonser dated February 25, 2010

SUBJECT: ROBINSON NUCLEAR PLANT NOTIFICATION OF INSPECTION AND
REQUEST FOR INFORMATION

Distribution w/encl:

C. Evans, RII

L. Slack, RII

OE Mail

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PUBLIC

RidsNrrPMRobinson Resource

Pre-Inspection Document Request
Occupational Radiation Safety Cornerstone

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

Inspection Dates: April 19-23, 2010 and May 10-15, 2010

Procedure(s): 71124.01, Radiological Hazard Assessment and Exposure Controls
71124.02, Occupational ALARA Planning and Controls
71124.03, In-Plant Airborne Radioactivity Control and Mitigation
71124.08, Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation
71151, Performance Indicator Verification

Documentation is requested from October 2008 to the present for inspection procedures 71124.02, 71124.03, and 71124.03. For IPs 71124.08 and 71151, we would like documentation from October 2009 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.

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 radiological hazards and exposure controls, e.g. verifying the posting and locking of entrances to locked-high radiation areas and very high radiation areas, spent fuel pool controls, and radioactive material storage areas.

General Information Request

1. Telephone numbers of contacts
2. Plant, Radiation Protection, and Chemistry organizational charts
3. List of radiation protection procedures
4. Most recent DAW 10 CFR Part 61 analytical results.
5. Offsite Dose Calculation Manual
6. Corrective Action Program and Performance Indicator collection/reporting procedures
7. FSAR sections related to radiation protection program and activities, ventilation systems (used for controlling airborne radioactivity), and solid radioactive waste processing.
8. Audits and self-assessments performed since October 2008 that encompass the areas of (1) radiation protection, (2) control of radiologically significant areas (including airborne), (3) radioactive material control, (4) respiratory protection, (5) radioactive solid waste handling, (6) radioactive material packaging and shipping, and (7) ISFSI.

Enclosure

71124.01: Radiological Hazard Assessment and Exposure Controls

1. Site and corporate procedures associated with assessing and controlling radiological hazards. Procedures should include:
 - a. Radiological surveys, postings, and radiation control barricades
 - b. Security and control of high radiation sources/objects, including those stored in pools
 - c. Radiation Work Permits
 - d. Radiological Job-Coverage
 - e. Controlling access to High Radiation Areas (HRAs), High Dose Rate High Radiation Areas (HDR-HRAs), and Very High Radiation Areas (VHRAs), including key controls
 - f. Radioactive material control, including contamination, hot particles, and survey/release of material for unrestricted use
 - g. Dosimetry monitoring (electronic dosimeters, multi-badging, whole body counting/internal dose assessment, etc.)
2. Description of any changes to plant operations that could result in a new radiological hazard for workers or members of the public.
3. List of the most exposure significant radiologically risk-significant work activities planned for the outage, including at least five activities scheduled during the week of the inspection.
4. List or map of HRAs, LHRAs, and VHRAs. Include areas with the potential to become a HRA during routine operations or outages.
5. RWPs for the 5 highest dose rate areas or outage tasks and RWPs for airborne areas.
6. Inventory of nonexempt licensed materials, including storage location.
7. List of unusual dosimetry occurrences, including electronic dosimeter malfunctions/alarms.
8. List of corrective action program (CAP) condition reports generated since October 2009 related to radiological hazard assessment and control, including the following:
 - a. Exposure controls, including high radiation area radiological incidents
 - b. Radiation monitoring (e.g. surveys, contamination, airborne)
 - c. Radiological events caused by radiation worker errors
 - d. Radiological events caused by radiation protection technician errors

Operation of an ISFSI (to be evaluated using IP 71124.01):

1. Procedures associated with the ISFSI facility. Procedures should include:
 - a. Radiological surveys, postings, and radiation control barricades
 - b. Environmental monitoring (including TLDs)
 - c. Loading of casks
 - d. Routine activities
2. Radiation surveys and environmental monitoring results (e.g. TLDs) of the ISFSI since October 2009.

3. Radiological records, including ALARA reviews/planning and RWPs, for the loading of casks since October 2009.
4. List of CAP condition reports generated since October 2009 related to the ISFSI with respect to radiation protection (i.e. access control, ALARA, radiation levels, etc.).

71124.02: Occupational ALARA Planning and Controls

1. Site and corporate procedures associated with maintaining occupational exposures ALARA. Include procedural guidance for processes used to estimate and track exposures from specific work activities, method(s) of adjusting exposure estimates or re-planning work when unexpected changes in scope or emergent work are encountered, and performance of post-job reviews.
2. Documentation of plant collective exposure history, current exposure trends, and ongoing or planned outage activities that present exposure challenges
3. List of work activities ranked by actual or estimated exposure that (1) are in progress and (2) were completed during the previous outage. The inspectors will select activities from the list for review the ALARA work activity evaluations, exposure estimates, and exposure mitigation requirements.
4. Historical trends and current status of significant tracked plant source changes in plant fuel performance issues or changes in plant primary chemistry
5. Audits and self-assessments performed of the ALARA program, including the previous outage's ALARA reviews/summaries.
6. List of CAP condition reports generated since October 2008 related to ALARA planning and controls.

71124.03: In-Plant Airborne Radioactivity Control and Mitigation

1. Site and corporate procedures associated with airborne radioactivity control and mitigation. Procedures should include:
 - a. Maintenance, inspection, and use of respiratory protection equipment including self-contained breathing apparatus (SCBA).
 - b. Use of installed plant systems including containment purge, spent fuel pool ventilation, and auxiliary building ventilation.
 - c. Use of temporary ventilation systems (e.g. HEPA/charcoal NPUs, tents, etc.)
2. List of recent activities in which respiratory protection equipment was used (planned outage activities should also be included in the list)
3. Records of air testing (i.e. Grade D certification) for supplied-air devices and SCBA bottles since October 2008.

4. List of CAP condition reports generated since October 2008 related to (1) the control and mitigation of in-plant airborne radioactivity and (2) respiratory protection.

71124.08: Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation

1. Site and corporate procedures associated with radioactive waste processing and handling, storage, and transportation of radioactive material (RAM), including:
 - a. Storage and handling of RAM including non-RCA and satellite RCA locations.
 - b. Waste stream mixing, sampling, concentration averaging, and use of scaling factors.
 - c. Monitoring impact of long-term storage (e.g. buildup of gases produced by waste decomposition, chemical reactions, container deformation, loss of container integrity, re-release of free-flowing water).
 - d. Transferring of resin and/or sludge into shipping/disposal containers; dewatering and waste stabilization.
 - e. Preparing packages and documentation for shipping radioactive materials.
2. List of RAM storage areas, including satellite RCAs.
3. Process Control Program.
4. List of changes to the radioactive waste processing systems since October 2008, and copies of the associated 50.59 screening documentation.
5. Log of radioactive material shipments (LSA I, II, III; SCO I, II, Type A, or Type B) since October 2008. (The inspectors will select 3-5 packages to review in detail.)
6. List of CAP condition reports generated since October 2008 related to radioactive solid waste processing and packaging, handling, storage, and shipping of radioactive materials.

71151 Performance Indicator (PI) Verification

1. Monthly PI reports since October 2009, and copies of associated condition reports for Occupational Exposure Control Effectiveness and RETS/ODCM Radiological Effluent occurrences
2. List of all corrective action documents since October 2009 using keywords such as: HRA, LHRA, VHRA, unintended dose, unlocked door, etc.
3. List of all dose rate alarms > 1 R/hr and dose alarms since October 2009.
4. Liquid and gaseous effluent release permits which specify the monthly (October 2009 – March 2009), quarterly (4th quarter 2009 and 1st quarter 2010), and annual (calendar year 2009) curies released by isotope and associated public dose assessments.

Inspector Contact Information:

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

Mailing Address

US Nuclear Regulatory Commission, Region II
ATTN: Heather Gepford
61 Forsyth St SW
Suite 23T85
Atlanta, Ga 30303