



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

December 6, 2011

Mr. Randy Gideon
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 - NRC EMERGENCY
PREPAREDNESS INSPECTION REPORT 05000261/2011501

Dear Mr. Gideon:

On November 17, 2011, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the H. B. Robinson Steam Electric Plant, Unit 2. The enclosed inspection report documents the inspection results, which were discussed on November 17, 2011, 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.

No findings were identified during this inspection.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if any, 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 Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

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

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

Enclosure:
Inspection Report 05000261/2011501
w/Attachment: Supplemental Information

cc w/encl.: (See page 2)

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Distribution w/Encl.

See page 4

(*) See previous concurrence page

X PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE X NON-SENSITIVE
ADAMS: X Yes ACCESSION NUMBER:ML113420229 X SUNSI REVIEW COMPLETE X FORM 665 ATTACHED

OFFICE	RII: DRS/PSB1	RII: DRS/PSB1	RII: DRP	RII: DRP			
SIGNATURE	RA/BB For MS *	RA/BB	RA *	RA *			
NAME	M. SPECK	B. BONSER	R. MUSSER	J. DODSON			
DATE	12/05/2011	12/05/2011	12/02/2011	12/02/2011			
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

cc w/encl:

Division of Radiological Health
TN Dept. of Environment & Conservation
401 Church Street
Nashville, TN 37243-1532

Sandra Threatt, Manager
Nuclear Response and Emergency
Environmental Surveillance
Bureau of Land and Waste Management
Dept. of Health and Environmental Control
Electronic Mail Distribution

Robert J. Duncan II
Vice President
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Brian C. McCabe
Manager, Nuclear Oversight
Shearon Harris Nuclear Power Plant
Progress Energy
Electronic Mail Distribution

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

Joseph W. Donahue
Vice President
Nuclear Oversight
Progress Energy
Electronic Mail Distribution

David T. Conley
Senior Counsel
Legal Department
Progress Energy
Electronic Mail Distribution

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

Richard Haynes
Director, Division of Waste Management
Bureau of Land and Waste Management
S.C. Department of Health and
Environmental Control
Electronic Mail Distribution

Kelvin Henderson
General Manager
Nuclear Fleet Operations
Progress Energy
Electronic Mail Distribution

Thomas Cosgrove
Plant General Manager
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Donna B. Alexander
Manager, Nuclear Regulatory Affairs
(interim)
Progress Energy
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

Greg Kilpatrick
Operations Manager
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

(cc w/encl. continued on page 3)

(cc w/encl. continued from page 2)

Mark Yeager
Division of Radioactive Waste Mgmt.
S.C. Department of Health and Environmental Control
Electronic Mail Distribution

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

Chairman
North Carolina Utilities Commission
Electronic Mail Distribution

Henry Curry
Training Manager
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
H. B. Robinson Steam Electric Plant
2112 Old Camden Rd
Hartsville, SC 29550

William R. Gideon
Director Site Operations
H. B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Christos Kamilaris
Manager, Support Services
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Rich Rogalski
Supervisor, Licensing/Regulatory Programs
H. B. Robinson Steam Electric Plant
Electronic Mail Distribution

John W. Flitter
Director of Electric & Gas Regulation
South Carolina Office of Regulatory Staff
Electronic Mail Distribution

Letter to Randy Gideon from Brian Bonser dated December 6, 2011.

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT - NRC EMERGENCY
PREPAREDNESS INSPECTION REPORT 05000261/2011501

Distribution w/Encl:

C. Evans, RII EICS (Part 72 Only)
L. Douglas, RII EICS (Linda Douglas)
OE Mail (email address if applicable)
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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos.: 05000261

License Nos.: DPR-23

Report No.: 05000261/2011501

Licensee: Carolina Power and Light Company

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

Location: Hartsville, SC

Dates: November 14, 2011, through November 17, 2011

Inspectors: M. Speck, Senior Emergency Preparedness Inspector
J. Dodson, Senior Project Engineer
T. Chandler, Senior Resident Inspector

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

Enclosure

SUMMARY OF FINDINGS

IR 05000261/2011501; 11/14/2011 – 11/17/2011; H. B. Robinson Steam Electric Plant, Unit 2; Exercise Evaluation and Baseline Inspection.

The report covered an announced inspection by an emergency preparedness inspector, a senior project engineer and one senior resident 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

None

B. Licensee-Identified Violations

None

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation

a. Inspection Scope

Prior to the inspection activity, the inspectors conducted an in-office review of the exercise objectives and scenario submitted to the NRC to determine if the exercise would test major elements of the emergency plan as required by 10 CFR 50.47(b)(14). This inspection activity represents one sample on a biennial cycle.

The onsite inspection consisted of the following review and assessment:

- The adequacy of the licensee's performance in the biennial exercise conducted on November 15, 2011, regarding the implementation of the Risk Significant Planning Standards (RSPSs) in 10 CFR 50.47 (b)(4), (5), (9), and (10), which address emergency classification, offsite notification, radiological assessment, and protective action recommendations respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the Control Room simulator, Technical Support Center (TSC), Operations Support Center (OSC), and Emergency Operations Facility (EOF).
- Other performance areas besides the RSPS, such as the emergency response organization's (ERO) recognition of abnormal plant conditions, command and control, intra-and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Federal Emergency Management Agency (FEMA)/Department of Homeland Security (DHS) exercise reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10 CFR 50.47(b)(14).
- The post-exercise critique process and the presentation to the licensee's senior management conducted on November 17, 2011, to evaluate the licensee's self-assessment of its ERO performance during the exercise and to ensure compliance with 10 CFR 50 Appendix E, Section IV.F.2.g.

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

b. Findings

No findings were identified.

Enclosure

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

Since the last NRC inspection of this program area, revisions 75, 76, 77, and 78 to the Robinson Emergency Plan were implemented. The licensee determined that in accordance with 10 CFR 50.54(q), 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 inspectors conducted a sampling review of the implementing procedure changes made between September 1, 2010, and November 15, 2011, 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 inspectors reviewed the documents listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the emergency action level and emergency plan changes on an annual basis.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

a. Inspection Scope

Cornerstone: Emergency Preparedness

The inspectors sampled licensee submittals for the three performance indicators (PI) listed below. For each of the submittals, the inspectors reviewed the period from July 1, 2010, through September 30, 2011. 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 Performance Indicator Guideline, Revision 6, 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 appropriate emergency preparedness personnel. The inspectors 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 were identified.

4OA6 Meetings, including Exit

On November 17, 2011, the lead inspector presented the inspection results to Mr. R. Gideon and other members of station management. The inspector confirmed that proprietary information was not provided during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

R. Gideon, Site Vice President
T. Cosgrove Plant General Manager
B. Matherne, Manager - Outage and Scheduling
G. Kilpatrick, Manager - Operations
S. Bull, Manager - Nuclear Oversight
R. Hightower, Licensing Supervisor
R. Rogalski, Licensing
J. Stephenson Fleet Emergency Preparedness Manager
T. Pilo Emergency Preparedness Supervisor
N. Baker, Emergency Preparedness
J. Baranski, Emergency Preparedness
L. Grant, Emergency Preparedness
L. Hall, Emergency Preparedness
M. Nelson, Emergency Preparedness
C. Thompson, Emergency Preparedness

LIST OF DOCUMENTS REVIEWED

1EP1 Exercise Evaluation

Procedures

CAP-NGGC-0200, Condition Identification and Screening Process, Rev. 34
CAP-NGGC-0205, Condition Evaluation and Corrective Action Process, Rev. 14
EPCLA-01, Emergency Control, Rev. 33
EPCLA-04, Emergency Action Level Technical Bases Document, Rev. 2
EPSPA-01, Evacuation and Accountability, Rev. 18
EPEOF-00, Activation and Operation of the Emergency Operations Facility, Rev. 17
EPEOF-01, Emergency Response Manager, Rev. 14
EPEOF-06, Dose Projection Team Leader, Rev. 8
EPRO-05, Scenario Development and Drill Control Guidelines, Rev. 19
EPOSC-00, Activation and Operation of the Operational Support Center, Rev. 22
EPOSC-01, Operational Support Center Leader, Rev. 23
EPOSC-04, Emergency Work Control, Rev. 10
EPTSC-00, Activation and Operation of the Technical Support Center, Rev. 14
EPTSC-01, Site Emergency Coordinator, Rev. 16
EPTSC-02, Plant Operations Director, Rev. 10
EPTSC-03, Emergency Repair Director, Rev. 5
EPTSC-04, Radiological Control Director, Rev. 18
EPTSC-07, Damage Assessment, Rev. 9
EPTSC-08, Technical Analysis Director, Rev. 7
EPSPA-01, Evacuation and Accountability, Rev. 18
EPSPA-03, Administration of Potassium Iodide, Rev. 10
EPRAD-03, Dose Projections, Rev. 27

Records and Data

Control Room (Simulator), Technical Support Center, Operations Support Center, Emergency Operations Facility, Joint Information Center - Documentation packages (logs, event notification forms, Protective Action Recommendations, Media releases, and Radiological Dose/Core damage Assessments)

Corrective Action Documents

499632 Drill OSI/PI scripts not updated for OSC equipment change
 499640 Invalid OSI/PI data was displayed on several displays used by ERO personnel
 499708 Request for RC technician in OSC to contact DHEC during exercise
 499713 OSC barrier breaches by non-ERO personnel
 499714 Evaluate TSC to NRC EC turnover – approached the 60 minute time limit
 499715 Security team leader found that procedure attachments were marked on
 499717 Security officer unable to secure door leading to EOC/TSC building
 499721 Lowering CV pressure not communicated to TSC in a timely manner
 499725 Miscommunication between field and control room to reset breakers
 499727 Activation of TSC not timely (58 minutes). Delayed due to conference call
 499730 Create a new ERO position for OPS communicator between Simulator & TSC
 499731 Security ESTL failed to relocate a Security officer when wind shifted
 499736 At drill start OSI/PI data aligned to operating plant data rather than simulator data
 499737 ENMON teams (both) exceeded RWP dose rate limit
 499752 Chemistry coordinator failed to notify OSC of inability to obtain samples
 499755 Chemistry technicians were called directly from control room rather than OSC
 499756 No phone or clock set up at Security desk
 499759 Investigate purchase of steam suits for use in drills involving steam conditions
 499761 R11 and R12 monitors never had abnormal alarms
 499762 Briefing rooms were not used during drill. Establish expectations for use of rooms
 499765 PARs exceeded 10 mile EPZ. Provide procedure guidance for recommendations
 499766 Two of the same sub-priorities assigned for two different missions
 499770 Additional habitability sign in hall or by Security desk needed
 499774 Mission dispatch time not recorded correctly in OSC for V12-9 mission
 499775 ERD failed to notify OSC of SI initiation
 499776 Add monthly test of intercom phones in EPPRO-02 attachment 10.3
 499778 The first ERO members responding to TSC could not gain access using badge
 499793 Request for dosimetry technician to contact DHEC during exercise
 499857 Offsite dose reported by DHEC in JIC did not match ENF/Progress Energy dose
 499906 Offsite agencies at JIC were not able to maintain wireless internet connection
 499915 JIC telephone problems related to new uconnect VOIP phones
 500055 “A” EDG running status provided by controller was incorrect
 500060 OPS recommendation to not start CV spray during EP exercise
 500071 OPS simulator crew requested additional “initial conditions” information in future
 500084 Hospital evaluator suspected one PIC was drifting
 500088 Simulator controller did not update controllers on return to service of “A” EDG
 500091 Investigate time required to provide dose projection data to state and counties
 500095 Additional guidance needed on use of EDMG procedures
 500097 WEBEOC time stamps for log entries were not accurate
 500098 Dose Projection team misread a spreadsheet which occupied EOF staff time
 500099 Technical basis for the inability to start loads was not properly validated for drill
 500100 EPPRO-04, EP PIs, is inconsistent with NEI 99-02 guidance
 500102 Emergency drill validation of containment pressure during LOCA scenarios

- 500129 Update release start time instructions to perform dose projections
- 500204 Possible ANS siren KPI data corrections require investigation

EP4: Emergency Action Level and Emergency Plan Changes

Procedures

REG-NGGC-0010, 10 CFR 50.59 and Selected Regulatory Reviews, Rev. 16

Records and Change Packages

- PLP-007, Robinson Emergency Plan, Rev. 75
- PLP-007, Robinson Emergency Plan, Rev. 76
- PLP-007, Robinson Emergency Plan, Rev. 77
- PLP-007, Robinson Emergency Plan, Rev. 78
- Emergency Action Level Matrix-All Conditions, Rev. 2
- Emergency Action Level Matrix-All Conditions, Rev. 3
- Emergency Action Level Matrix-Hot Conditions, Rev. 2
- EPNOT-01, CR/EOF Emergency Communicator, Rev. 37
- EPNOT-03, EOF Public Information Emergency Communicator, Rev. 14
- EPCLA-01, Emergency Control, Rev. 33
- EPSPA-01, Evacuation and Accountability, Rev. 18
- EPRAD-03, Dose Projections, Rev. 27

Corrective Action Documents

474404; EAL Matrix requires correction

40A1 Performance Indicator Verification

Procedures

- REG-NGGC-0009, NRC Performance Indicators and Monthly Operating Report Data, Rev. 11
- EPPRO-03, Training and Qualification, Rev. 30
- EPPRO-04, Alert and Notification System Reliability, Rev. 18

Records and Data

Documentation of Performance Indicator data July 1, 2010, to September 30, 2011, for DEP, ANS, and ERO

LIST OF ACRONYMS

ADAMS	Agency-wide Documents Access and Management System
ANS	Alert and Notification System
CFR	Code of Federal Regulations
DEP	Drill/Exercise Performance
DHS	Department of Homeland Security
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
OSC	Operations Support Center
PARS	Publicly Available Records
PI	Performance Indicator
PS	Planning Standard
RSPS	Risk Significant Planning Standard
TSC	Technical Support Center