



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

July 27, 2012

Mr. William R. Gideon
Vice President
Progress Energy
H. B. Robinson Steam Electric Plant, Unit 2
3581 West Entrance Rd
Hartsville, SC 29550

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT- NOTIFICATION OF CONDUCT
OF A TRIENNIAL FIRE PROTECTION BASELINE INSPECTION (NRC
INSPECTION REPORT NO. 05000261/2012008)

Dear Mr. Gideon:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region II staff will conduct a triennial fire protection baseline inspection at H.B. Robinson Steam Electric Plant in October 2012. The inspection team will be led by Mr. Reinaldo Rodriguez, NRC Senior Reactor Inspector, of the Region II Office. The team will be composed of personnel from the NRC Region II Office. The inspection will be conducted in accordance with Inspection Procedure 71111.05T, the NRC's baseline fire protection inspection procedure dated January 1, 2012.

On July 24, 2012, during a conversation between Mr. Alan L. Holder of your staff, and Mr. Rodriguez, our respective staffs confirmed arrangements for a three-day information gathering onsite visit and a two-week onsite inspection. The schedule for the inspection is as follows:

- Information gathering visit: September 11 - 13, 2012
- Week 1 of onsite inspection: October 1 - 5, 2012
- Week 2 of onsite inspection: October 15 - 19, 2012

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, to become familiar with the H.B. Robinson Steam Electric Plant fire protection program, fire protection features, and post-fire safe shutdown capabilities and plant layout, mitigating strategies to address Section B.5.b of NRC Order EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures," dated February 25, 2002, and Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(hh)(2). The types of documents the team will be interested in reviewing, and possibly obtaining, are listed in Enclosures 1 and 2. Please contact Mr. Rodriguez prior to preparing copies of the materials listed in the Enclosures. The inspection team will try to minimize your administrative burden by specifically identifying those documents required for inspection preparation.

During the information gathering visit, the team will also discuss the following inspection support administrative details: office space; specific documents to be made available to the team in their office space; arrangements for unescorted site access (including radiation protection training,

security, safety and fitness for duty requirements); and the availability of knowledgeable plant engineering, operations and licensing organization personnel to serve as points of contact during the inspection.

We request that during the inspection weeks you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the Robinson fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest for the fire protection portion of the inspection are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. For the B.5.b portion of the inspection, those documents implementing your mitigating strategies and demonstrating the management of your commitments for the strategies are of specific interest. Also, personnel should be available at the site during the inspection that are knowledgeable regarding those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room (including the electrical aspects of the relevant post-fire safe shutdown analyses), reactor plant fire protection systems and features, and the Robinson fire protection program and its implementation.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact Mr. Rodriguez at (404) 997-4498, or me at (404) 997-4511.

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> <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Michael F. King, Chief
Engineering Branch 2
Division of Reactor Safety

Docket No.: 50-261

License No.: NPF-23

Enclosures: 1. Triennial Fire Protection Inspection Support Documentation
2. Mitigating Strategies Support Documentation

cc w/encl. (See page 4)

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| DATE | 7/27/2012 | 7/27/2012 | 7/27/2012 | 7/ /2012 | 7/ /2012 | 7/ /2012 | 7/ /2012 |
| E-MAIL COPY? | YES NO | YES NO | YES NO | YES NO | YES NO | YES NO | YES NO |

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cc w/encls:
Division of Radiological Health
TN Dept. of Environment & Conservation
401 Church Street
Nashville, TN 37243-1532

Donald W. Barker
Manager, Nuclear Oversight
H. B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Robert J. Duncan II
Vice President
Nuclear Operations
Progress Energy
Electronic Mail Distribution

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

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

Richard Hightower
Supervisor
Licensing/Regulatory Programs
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

(cc w/encls cont'd – See page 5)

(cc w/encls cont'd)
Greg Kilpatrick
Operations Manager
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

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

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

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

Letter to William R. Gideon from Michael F. King dated July 27, 2012.

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Distribution w/encls:

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Triennial Fire Protection Program Supporting Documentation

Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit. Electronic media is preferred, if readily available. (The preferred file format on CD-ROM or DVDROM is “.pdf”). The CD/DVD-ROM should be indexed, hyperlinked, readable, and searchable to facilitate ease of use. Please provide 5 copies of each CD/DVD-ROM submitted. Information in “lists” should contain enough information to be easily understood by someone who has knowledge of the technology. The lead inspector will discuss specific information needs with the licensee staff and may request additional documents or electronic information.

1. The current version of the fire protection program and fire hazards analysis.
2. Corrective action closeouts as part of operator manual actions corrective actions.
3. List of identified fire induced circuit failure configurations for the selected fire areas/zones (to be determined during information gathering visit).
4. Corrective actions for fire-induced circuit failures, both single and multiple spurious actuations for the selected fire areas/zones (to be determined during information gathering visit).
5. Cable routing for components and equipment credited for safe shutdown for the selected fire areas/zones (to be determined during information gathering visit).
6. List of protected safe shutdown train equipment for the selected fire areas/zones (to be determined during information gathering visit).
7. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).
8. Fire brigade training program and pre-fire plans.
9. Post-fire safe shutdown systems and separation analysis.
10. Post-fire alternative shutdown analysis.
11. Piping and instrumentation diagrams showing the components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability.
12. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment.
13. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.
14. Plant layout drawings which identify the general location of the post-fire emergency lighting.

15. Plant operating procedures which would be used and describe shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room, procedures which would be used to implement alternative shutdown capability in the event of a fire in the control or cable spreading room.
16. Maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.
17. Maintenance procedures that routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
18. A list of significant fire protection and post-fire safe shutdown related design change packages and evaluations according to Generic Letter 86-10, "Implementation of Fire Protection Requirements."
19. The reactor plant's Individual Plant Examination for External Events (IPEEE), results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information.
21. Organization charts of site personnel (including fire protection staff personnel).
22. If applicable, drawings of potential reactor coolant/recirculation pump lube oil system leakage points and associated lube oil collection systems.
23. Licensing basis documents for fire protection (safety evaluation reports, pertinent sections of the final safety analysis report, exemptions, deviations, letters to/from the NRC regarding fire protection/fire safe shutdown, etc.).
24. Procedures/instructions that control the configuration of the plant's fire protection program, features, and post-fire safe shutdown methodology, and system design.
25. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations.
26. Procedures/instructions that govern the implementation of plant modifications, maintenance, special operations, and their impact on fire protection.
27. Internal and external self-assessments, audits, peer-assessments or similar reviews related to post-fire safe shutdown capability or the fire protection program completed since the previous NRC fire protection triennial inspection.
28. Recent quality assurance surveillances of fire protection activities.
29. A listing of open and closed fire protection condition reports (problem reports/nuclear condition reports/event analysis reports/problem identification, and resolution reports) since the last triennial inspection.

Mitigating Strategies Supporting Documentation

Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit. The current version of these documents is expected unless specified otherwise. Electronic media is preferred, if readily available. (The preferred file format on CD-ROM or DVDROM is “.pdf”). The CD/DVD-ROM should be indexed, hyperlinked, readable, and searchable to facilitate ease of use. Please provide 5 copies of each CD/DVD-ROM submitted. The lead inspector will discuss specific information needs with the licensee staff and may request additional documents or electronic information.

1. A list of all modifications to regulatory commitments made to meet the requirements of Section B.5.b of NRC Order, EA-02-026, “Order for NRC Interim Safeguards and Security Compensatory Measures,” dated February 25, 2002, the subsequently imposed license conditions, and Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(hh)(2).
2. Lists of procedures/guidelines that were revised or generated to implement the mitigation strategies. These could be extensive damage mitigation guidelines (EDMGs), severe accident management guidelines (SAMGs), emergency operating procedures (EOPs), abnormal operating procedures (AOPs), etc.
3. A matrix that shows the correlation between the mitigation strategies identified in Nuclear Energy Institute 06-12, Revision 2, “B.5.b Phase 2 & 3 Submittal Guideline,” issued December 2006, and the site-specific procedures or guidelines used to implement each strategy.
4. Engineering evaluations/calculations that were used to verify engineering bases for the mitigation strategies.
5. Piping and instrumentation diagram for systems relied upon in the mitigation strategies. These could be of the type used for training.
6. A list of modification packages or simplified drawings or descriptions of modifications that were made to plant systems to implement the mitigation strategies.
7. Copies of procedures used to inventory equipment (hoses, fittings, pumps, etc.) required to implement the mitigation strategies.
8. A list of B.5.b strategies, if any, that have implementing details that differ from those documented in the submittals and the safety evaluation report.
9. A copy of site general arrangement drawing(s) that show the majority of buildings/areas referenced in B.5.b documents.
10. Training records, training matrix, and lesson plans related to B.5.b.
11. Copies of Memoranda of Understanding (MOUs) (e.g., with local fire departments) required to implement any mitigating strategies.