

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION II 245 PEACHTREE CENTER AVENUE NE, SUITE 1200 ATLANTA, GEORGIA 30303-1257

June 19, 2013

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 – NRC EMERGENCY PREPAREDNESS INSPECTION REPORT 05000261/2013503

Dear Mr. Gideon:

On May 23, 2013, 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 that were discussed on May 23, 2013, 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 Title 10 of the *Code of Federal Regulations* (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

W. Gideon

Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management 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 05000261/2013-503 w/Attachment: Supplemental Information

cc: (See pages 3 and 4)

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

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Inspection Report 05000261/2013-503 w/Attachment: Supplemental Information

cc: (See pages 3 and 4)

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 ☐ NON-PUBLICLY AVAILABLE
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 ADAMS: X Yes
 ACCESSION NUMBER:
 ML13170A170
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OFFICE	RIII:DRS/PSB	RII:DRS/PSB1	RII:DRS/PSB2	RII:DRP	RII:DRS/PSB1	
SIGNATURE	JLB2 via e-mail	WTL	JDG1	GTH1	BRB1	
NAME	J. Beavers	W. Loo	J. Graham	G. Hopper	B. Bonser	
DATE	6/ 17 /2013	6/ 12 /2013	6/ 17 /2013	6/ 17 /2013	6/ /2013	
E-MAIL COPY	YES NO	YES NO	YES NO	YES NO	YES NO	

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cc: (continued on page 4)

cc: (continued from page 3)

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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No: 05000261

License No: DPR-23

Report No: 05000261/2013-503

Licensee: Carolina Power and Light Company

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

Location: Hartsville, SC

Dates: May 20, 2013 through May 23, 2013

Inspectors: J. Beavers, Emergency Preparedness Inspector

M. Garza, Emergency Response Specialist J. Graham, Physical Security Inspector

R. Jickling, Senior Emergency Preparedness Inspector

W. Loo, Senior Health Physicist

Approved by: Brian R. Bonser, Chief

Plant Support Branch 1 Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000261/2013503; 5/20/2013 – 5/23/2013; H. B. Robinson Steam Electric Plant, Unit 2; Exercise Evaluation – Hostile Action (HA) Event; Exercise Evaluation – Scenario Review; Performance Indicator Verification.

The report covered an announced inspection by two emergency preparedness inspectors, an emergency response specialist, a physical security inspector, and a senior health physicist. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4.

A. NRC-Identified and Self-Revealing Findings

No findings were identified.

B. <u>Licensee-Identified Violations</u>

None.

REPORT DETAILS

REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP7 Exercise Evaluation – Hostile Action (HA) Event (71114.07)

a. <u>Inspection Scope</u>

Title 10 of the *Code of Federal Regulations* (10 CFR) 50, Appendix E, Section IV.F.2.j, requires in part that nuclear power reactor licensees, in each eight calendar year exercise cycle, provide the opportunity for their emergency response organization (ERO) to demonstrate proficiency in the key skills necessary to respond to a hostile action (HA) directed at the plant site. H. B. Robinson designed the May 21, 2013, exercise to satisfy that requirement, and the NRC inspected the H. B. Robinson HA event exercise to assess H. B. Robinson's ability to effectively implement their Emergency Plan during a HA event, and adequately protect public health and safety. This overall exercise inspection activity represented the completion of one sample on a biennial cycle.

The exercise evaluation consisted of the following reviews and assessments:

- The adequacy of the licensee's performance in the biennial exercise conducted on May 21, 2013, regarding the implementation of the Risk Significant Planning Standards (RSPSs) in 10 CFR 50.47 (b)(4), (5), (9), and (10), which addresse 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), Incident Command Post (ICP), and Emergency Operations Facility (EOF).
- A review of other performance areas, such as: the licensee ERO's recognition of abnormal plant conditions; command and control, including interactions with site security staff; intra- and inter-facility communications; prioritization of mitigating activities; utilization of repair and field monitoring teams; interface with offsite agencies, including local law enforcement agencies; staffing and procedure adequacy; 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 adequacy of the licensee's post-exercise critiques, to evaluate H.B. Robinson's self-assessment of its ERO performance during the May 21, 2013, exercise and to ensure compliance with 10 CFR Part 50, Appendix E, Section IV.F.2.g.

The inspectors reviewed various documents, which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the exercise evaluation on a biennial basis.

b. Findings

No findings were identified.

1EP8 <u>Exercise Evaluation – Scenario Review (71114.08)</u>

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 using IP 71114.08, "Exercise Evaluation - Scenario Review," 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 inspectors reviewed various documents, which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the exercise evaluation on a biennial basis.

b. <u>Findings</u>

No findings were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

a. <u>Inspection Scope</u>

The inspectors sampled licensee submittals relative to the Performance Indicators (PI) listed below for the period from April 1, 2012, through March 31, 2013. 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," was used to confirm the basis in reporting for each data element.

<u>Cornerstone</u>: <u>Emergency Preparedness</u>

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

For the specified review period, the inspectors examined data reported to the NRC, procedural guidance for reporting PI information, and records used by the licensee to identify potential PI occurrences. The inspectors verified the accuracy of the DEP

through review of a sample of drill and event records. The inspectors reviewed selected training records to verify the accuracy of the ERO PI for personnel assigned to key positions in the ERO. The inspectors verified the accuracy of the PI for ANS reliability through review of a sample of the licensee's records of periodic system tests. Licensee procedures, records, and other documents reviewed within this inspection area are listed in the Attachment.

This inspection activity satisfied one inspection sample for each of the three Emergency Preparedness PI, (i.e., DEP, ERO, and ANS) on an annual basis.

b. Findings

No findings were identified.

4OA6 Meetings, including Exit

On May 23, 2013, the lead inspector presented the inspection results to Mr. R. Gideon, Site Vice President, and other members of the plant staff. The inspectors confirmed that proprietary information was not provided during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

- M. Adams, Nuclear Oversight
- M. Austin, Fleet Emergency Preparedness
- N. Baker, Emergency Preparedness
- L. Faulk, Security Manager
- S. Brown, Operations
- S. Connelly, Regulatory Affairs
- D. Sittall, Nuclear Oversight
- G. LaGarde, Emergency Preparedness
- T. Grigg, Training
- L. Gruut, Emergency Preparedness
- L. Hall, Emergency Preparedness
- S. Hall, Radiological Protection
- R. Hightower, Supervisor Regulatory Affairs
- A. Lucas, Emergency Preparedness
- A. Maysam, Regulatory Affairs
- M. Nelson, Emergency Preparedness
- S. Peavyhouse, Manager Organizational Effectiveness
- T. Pilo, Emergency Preparedness Supervisor
- J. Stephenson, Fleet Emergency Preparedness
- J. Wild, Regulatory Affairs
- S. Williams, Chemistry Manager

LIST OF DOCUMENTS REVIEWED

1EP7 Exercise Evaluation – Hostile Action (HA) Event

Procedures

PLP-007, Robinson Emergency Plan, Rev. 79

EPCLA-01, Emergency Control, Rev. 35

EPCLA-04, Emergency Action Level Technical Bases Document, Rev. 7

AOP-034, Security E, Rev. 22

AOP-036, SFP Events, Rev. 2

PLP-021, Chemical Storage, Inventory, Spill and Hazard Communication Program, Rev. 28

EPEOF-00, Activation and Operation of the Emergency Operations Facility, Rev. 18

EPTSC-00, Activation and Operation of the Technical Support Center, Rev. 15

Records and Data

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

Corrective Action Documents

607711	HAB Exercise Mitigation Urgency and Priorities
607768	HAB Exercise First Responder Callout
607771	HAB Exercise Concurrent Take Cover Announcement and Evacuation Alarm
607807	HAB Exercise Difficulties with Access Restoration
607810	HAB Exercise Difficulties with Site Ingress and Egress
607814	HAB Exercise Dispatch of Field Monitoring Team Issues
607820	HAB Exercise ERO Activation Code Conflicting Messages
607827	HAB Exercise Controller and Participant Interface
607829	EP Assembly Location Capacity Issue
607988	HAB Exercise Activation Timeliness during HAB
608020	HAB Exercise LLEA Protocols for Release of Non-Essential Personnel

<u>1EP8 Exercise Evaluation – Scenario Review</u>

Procedures

EPPRO-05, Scenario Development and Drill Control Guideline, Rev. 22

Records and Data

Robinson Nuclear Plant 2013 Hostile Action Based Exercise Scenario

Corrective Action Documents

607476 HAB Exercise Scenario Submittal Issue

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 April 1, 2012, to March 31, 2013, for DEP, ANS, and ERO

LIST OF ACRONYMS

ADAMS Agency-wide Documents Access and Management System

ANS Alert and Notification System DEP Drill/Exercise Performance

DHS Department of Homeland Security
EOF Emergency Operations Facility
ERO Emergency Response Organization
FEMA Federal Emergency Management Agency

HA Hostile Action

ICP Incident Command Post NEI Nuclear Energy Institute

NRC Nuclear Regulatory Commission
OSC Operations Support Center
PI Performance Indicator

PS Planning Standard

RSPS Risk Significant Planning Standard

TSC Technical Support Center