UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	Docket No. 50-261
CAROLINA POWER AND LIGHT COMPANY	)	
	)	
(H. B. Robinson Steam Electric Plant, Unit No. 2)	)	

ORDER CONFIRMING LICENSEE COMMITMENTS
ON POST-TMI RELATED ISSUES

I.

Carolina Power and Light Company (the licensee) is the holder of Facility Operating License No. DPR-32 which authorizes the operation of the H. B. Robinson Steam Electric Plant, Unit No. 2 (the facility) at steady-state power level not in excess of 2300 megawatts thermal (rated power). The facility is a pressurized water reactor (PWR) located at the licensee's site in Darlington County, South Carolina.

II.

Following the accident at Three Mile Island Unit No. 2 (TMI-2) on March 28, 1979, the Nuclear Regulatory Commission (NRC) staff developed a number of proposed requirements to be implemented on operating reactors and on plants under construction. These requirements include Operational Safety, Siting and Design, and Emergency Preparedness and are intended to provide substantial

additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

(1) For applicable items that have been completed, confirmation of completion and the date of completion, (2) for items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and (3) justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

III.

Carolina Power and Light Company responded to Generic Letter 82-05 by letter dated April 15, 1982, as supplemented by letters dated December 21, 1982 and February 7, 1983; Carolina Power and Light Company responded to Generic Letter 82-10 by letter dated June 9, 1982, as supplemented by letter dated December 7, 1982. In these submittals, the licensee confirmed that some of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

There are six items from Generic Letter 82-10 that, as noted in the Table (Attachment 2), have licensee schedules to be determined and are therefore not included in this Order. Some of the items addressed in this Order are considered by the licensee to be completed or to require no modifications. The staff's evaluation of the licensee's delays for the remaining items is provided herein:

II.B.3 Post Accident Sampling

This item will be delayed by the licensee and will be completed by July 1983. The portion of this work requiring an outage was completed during the last refueling outage. The outage was extensive because it included a 10 year inservice inspection program requiring engineering and construction resources to be redirected from the design and construction of the movable shield wall

portion of the modification. Installation has been slowed due to a number of vendor recommended field changes which has delayed the systems initial start-up, flush and testing. Additional problems are expected during the initial start-up sequence due to design complexity and newness. During the interim period, previously estabished procedures for obtaining post-accident samples will remain in effect that were approved as TMI Lessons Learned Category A items.

III.D.3.4 Control Room Habitability

The licensee is not required by NUREG-0737 to adhere to an implementation date. However, the licensee is required to furnish a schedule indicating a completion date for this activity. The licensee's letter dated June 9, 1982, in response to Generic Letter 82-10, committed to a completion date of January 1984. However, NRC letter dated October 1, 1982 required the licensee to address all deficiencies identified in their contractors report. The licensee's letter dated December 7, 1982 committed to a response on or by June 1, 1983 and to provide a new schedule for implementation for any modifications and corrections found necessary with their response to our letter dated October 1, 1982. Therefore, the licensee's commitment date for III.D.3.4 implementation is to be re-determined by June 1983.

We find, based on the above evaluation, that: 1) the licensee has taken corrective actions regarding the delays and has made a responsible for the effort to implement the NUREG-0737 requirements noted; 2) there is good cause several delays (unexpected design complexity, interface problems, and equipment delays); and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore, the licensee's commitment should be confirmed by Order.

IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described in the Attachments to this Order in the manner described in the licensee's submittals noted in Section III herein no later than the dates in the Attachments.

V.

The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order. This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

for Robert A. Purple, Deputy Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 14th day of March, 1983.

Attachments:
1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

PLANT NAME: H. B. Robinson
Steam Electric Plant, Unit 2

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
I.A.3.1	Simulator Exams	10/1/81	Include simulator exams in licensing examinations.	Complete
II.B.2	Plant Shielding	1/1/82	Modify facility to provide access to vital areas under accident conditions.	Complete
II.B.3	Post-accident sampling	1/1/82	Install upgrade post-accident sampling capability.	July 1983
II.B.4	Training for Mitigating Core Damage	10/1/81	Complete training program.	Complete
II.E.1.2	Aux FW Indication & Flow Indicator	7/1/81	Modify instrumentation to level of safety grade.	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 5 - lower containment pressure setpoint to level compatible with normal operation.	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 7 - isolate purge and vent valves on radiation signal.	Complete

*Where complete date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

PLANT NAME: H. B. Robinson
Steam Electric Plant, Unit 2

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
II.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors.	Complete
		1/1/82	(2) Provide capability for effluent monitoring of iodine.	Complete
		1/1/82	(3) Install in-containment radiation-level monitor.	Complete
		1/1/82	(4) Provide continuous indication of containment pressure.	Complete
		1/1/82	(5) Provide continuous indication of containment water level.	Complete
		1/1/82	(6) Provide continuous indication of hydrogen concentration in containment.	Complete

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

ATTACHMENT 2

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
I.A.1.3.1	Limit Overtime	10/1/82 per Gen. Ltr. 82-12 dtd. 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Gen. Ltr. No. 82-12, dtd. June 15, 1982.	Complete
I.A.1.3.2	**Minimum Shift Crew	To be superseded by Proposed Rule.	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units.	To be addressed when Final Rule is issued.
I.C.1	**Revise Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability.	To be determined.
II.D.1.2	RV and SV Test Programs	7/1/82	Submit plant specific reports on relief and safety valve program.	Complete
II.D.1.3	Block Valve Test Program	7/1/82	Submit report of results of test program.	Complete
II.K.3.30 & 31	**SBLOCA Analysis	1 yr. after staff approval of model	Submit plant specific analyses.	To be determined following staff approval of model.
III.A.1.2	**Staffing Levels for Emergency Situations	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined.
III.A.1.2	**Upgrade Emergency Support Facilities	"" ""	"" ""	"" ""
III.A.2.2	**Meteorological Data	"" ""	"" ""	"" ""
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study	To be determined in June 1983

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

**Not Part of Confirmatory Order