



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

OCT 04 1985

Report No.: 50-261/85-29

Licensee: Carolina Power and Light Company
P. O. Box 1551
Raleigh, NC 27602

Docket No.: 50-261

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection Conducted: September 9 - 13, 1985

Inspector: *R. R. Marston* *10/1/85*
foa R. R. Marston Date Signed

Approved by: *A. L. Cunningham* *10/1/85*
A. L. Cunningham, Acting Chief Date Signed
Emergency Preparedness Section
Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine, unannounced inspection entailed 27 inspector-hours onsite in the area of emergency preparedness.

Results: Of the areas inspected, no violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *R. E. Morgan, General Manager
- *F. L. Lowery, Operations Manager
- R. G. Rieck, Manager of Control and Administration
- *D. C. Stadler, Director of Regulatory Compliance
- *H. J. Young, Director of QA/QC
- *D. W. Labelle, Sr. Engr., Onsite Nuclear Safety
- *C. L. Wright, Sr. Specialist, Regulatory Compliance
- V. L. Smith, Sr. Training Specialist
- *W. F. Trolenberg, OT & TS Emergency Preparedness Project Specialist
- *M. C. Morrow, Emergency Preparedness Specialist
- R. D. Croak, Document Control Specialist
- T. R. Byron, Shift Foreman
- E. A. Lee, Shift Foreman
- D. W. McCaskill, Shift Foreman
- *J. C. Sturdavant, Regulatory Compliance Technician
- *S. E. Wallace, Emergency Preparedness Tech. Aide

Other Organizations

- T. W. Livingston, Chief, Hartsville Fire Department
- J. Gardner, R.N., Director of Nursing, Byerly Hospital
- P. M. Alexander, M.D., Associate, Hartsville Family Practice
- R. Brock, Chief of Operations, Lake Robinson Volunteer Rescue Squad
- J. P. McKelvy, Acting Director, Darlington County Emergency Preparedness Agency

NRC Resident Inspector

H. C. Whitcomb

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on September 13, 1985, with those persons indicated in paragraph 1 above. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Emergency Detection and Classification (82201)

Pursuant to 10 CFR 50.47(b)(4) and 10 CFR Part 50, Appendix E, Sections IV.B and IV.C, this program area was inspected to determine whether the licensee used and understood a standard emergency classification and action level scheme.

The inspector verified that the licensee's notification procedures included criteria for initiation of offsite notifications and for development of protective action recommendations. The notification procedures required that offsite notifications be made promptly after declaration of an emergency.

The inspector discussed with licensee representatives the coordination of EALs with State and local officials. Licensee documentation showed that the licensee had discussed the EALs during March 1985 with State and local officials, and that these officials agreed with the EALs used by the licensee.

Interviews were held with three Shift Foremen to verify that they understood the relationship between core status and such core damage indicators as containment dome monitor, inadequate-core-cooling indicator, high-range effluent monitor, containment hydrogen monitor, and vessel coolant level. All interviewees appeared knowledgeable of the various core damage indications and their relationship to core status.

The responsibility and authority for classification of emergency events and initiation of emergency action were prescribed in licensee procedures and in the emergency plan. Interviews with selected key members of the licensee's emergency organization revealed that these personnel understood their responsibilities and authorities in relation to accident classification, notification, and protective action recommendations.

Walk-through evaluations involving accident classification problems were conducted with three Shift Foremen. All personnel interviewed promptly and properly classified the hypothetical accident situations presented to them, and appeared to be familiar with appropriate classification procedures.

No violations or deviations were identified.

5. Protective Action Decision-Making (82202)

Pursuant to 10 CFR 50.47(b)(9) and (10) and 10 CFR Part 50, Appendix E, Section IV.D.3, this area was inspected to determine whether the licensee had 24-hour-per-day capability to assess and analyze emergency conditions and make recommendations to protect the public and onsite workers, and whether offsite officials had the authority and capability to initiate prompt protective action for the public.

The inspector discussed responsibility and authority for protective action decision-making with licensee representatives and reviewed pertinent

portions of the licensee's emergency plan and procedures. The plan and procedures clearly assigned responsibility and authority for accident assessment and protective action decision-making. Interviews with members of the licensee's emergency organization revealed that these personnel understood their authorities and responsibilities with respect to accident assessment and protective action decision-making.

Walk-through evaluations involving protective action decision-making were conducted with three Shift Foremen. Personnel interviewed appeared to be cognizant of appropriate onsite protective measures and aware of the range of protective action recommendations appropriate to offsite protection. Personnel interviewed were aware of the need for timeliness in making initial protective action recommendations to offsite officials. Interviewees demonstrated adequate understanding of the requirement that protective action recommendations be based on core condition and containment status even if no release is in progress.

No violations or deviations were identified.

6. Changes to the Emergency Preparedness Program (82204)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and 10 CFR 50, Appendix E, Sections IV and V, this area was reviewed to determine whether changes were made to the program since the last routine inspection (August 1984) and to note how these changes affected the overall state of emergency preparedness.

The inspector discussed the licensee's program for making changes to the emergency plan and implementing procedures. The inspector reviewed the licensee's procedure (AP-004, Development, Review and Approval of Procedures, Revisions, and Temporary Changes) governing review and approval of changes to the plan and procedures. The inspector verified that changes to the plan and procedures were reviewed and approved by management. It was also noted that all such changes were submitted to NRC within 30 days of the effective date, as required.

Discussions were held with licensee representatives concerning recent modifications to facilities, equipment, and instrumentation. Licensee representatives stated that the Technical Support Center (TSC) and Emergency Operations Facility (EOF) were moved to a new building and a new (ROLM) telephone system with an autodial feature was installed. The Plan and Procedures were being upgraded to reflect these changes.

The organization and management of the emergency preparedness program were reviewed. The inspector verified that there were no significant changes in the organization or assignment of responsibility for the plant and corporate emergency planning staffs since the last inspection, except for the addition of a Manager of Control and Administration to relieve the General Manager of some of his administrative details. The inspector's discussion with licensee representatives also disclosed that there were no significant changes in the organization and staffing of the offsite support

agencies since the last inspection, except for the retirement of the Darlington County Emergency Preparedness Director.

The inspector reviewed the licensee's program for distribution of changes to the emergency plan and procedures. Document control records for calendar year 1984 showed that appropriate personnel and organizations were sent copies of plan and procedural changes, as required.

No violations or deviations were identified.

7. Knowledge and Performance of Duties (Training) (82206)

Pursuant to 10 CFR 50.47(b)(15) and 10 CFR Part 50, Appendix E, Section IV.F, this area was inspected to determine whether emergency response personnel understood their emergency response roles and could perform their assigned functions.

The inspector reviewed the description (in the emergency plan) of the training program, training procedures, and selected lesson plans, and interviewed members of the instructional staff. Inspection disclosed that the licensee had established a formal emergency training program.

Records of training for key members of the emergency organization for the period March 1984 through August 1985 were reviewed. The training is generally accomplished for members (non-licensed) of the onsite organization by means of a self-study guide and take-home test. The training procedure, PEP-653, "Performance of Training, Exercises, and Drills," specified elements of training for each position in the emergency organization. Training programs did not exist for each position, however. For example, a Radiological Control Director took the Site Emergency Coordinator course and the Dose Projection Personnel course. It could not be clearly verified from the study guides and other records that all the elements for each position specified in PEP-653 were completed. The inspector stated that the following would be an inspector followup item:

Clarify training elements in the Procedure and Study Guides to ensure all elements required for a position are met (50-261/85-29-01).

The inspector also discussed training and coordination with representatives of the Hartsville Fire Department, Byerly Hospital, Hartsville Family Practice, the Lake Robinson Volunteer Rescue Squad, and the Darlington County Emergency Preparedness Agency. No problems were reported in either area. The inspector noted that the licensee did not have records for training provided to all offsite agencies. The inspector stated that the following would be an inspector followup item:

Maintain records of emergency response training provided to offsite support agencies (50-261/85-29-02).

The inspector conducted walk-through evaluations with selected key members of the emergency organization. During these walk-throughs, individuals were

given various hypothetical sets of emergency conditions and data and asked to talk through the response they would make if such an emergency actually existed. The individuals demonstrated familiarity with emergency procedures and equipment, and no problems were observed in the areas of emergency detection and classification, notifications, and protective action decision-making.

No violations or deviations were identified.

8. Licensee Audits (82210)

Pursuant to 10 CFR 50.47(b)(14) and (16) and 10 CFR 50.54(t), this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program.

Records of audits of the program were reviewed. The records showed that an independent audit of the program was conducted by Corporate Quality Assurance during September 1984. This audit fulfilled the 12-month frequency requirement for such audits. The audit records showed that the State and local government interfaces were evaluated. A licensee representative stated that any findings discovered in this area would be made available to State and local government authorities. Audit findings and recommendations were presented to plant and corporate management. A review of past audit reports indicated that the licensee complied with the five-year retention requirement for such reports.

The licensee's program for follow-up action on audit findings was reviewed. Licensee procedures required follow-up on deficient areas identified during audits. The inspector reviewed licensee records dated October 1984 which indicated that corrective action was taken on identified problems, as appropriate. The licensee had established a tracking system as a management tool in following up on actions taken in deficient areas.

No violations or deviations were identified.

9. Inspector Follow-up (92701)

- a. (Closed) Inspector Follow-up Item (IFI) (50-261/84-28-01): Documentation of Annual review of EALS with offsite agencies. The inspector reviewed documents acknowledging that a review of the Emergency Plan and Procedures (including EALs) was conducted. The documents were signed by representatives of State and local emergency preparedness agencies.
- b. (Closed) IFI 50-261/84-28-03: Proper classification and protective action recommendation for an event involving loss of physical control of the plant to intruders. The inspector determined that provisions were made for classification of this event and provision of appropriate protective action recommendations.

- c. (Closed) IFI 50-261/84-28-04: Develop mechanism to translate protective action recommendations from sectors to zones. The inspector noted that a note was added to the protective action recommendation figure in PEP-105 to use the EPZ map to determine applicable zones.
- d. (Closed) IFI 50-261/84-28-05: Conduct a periodic drill or study to verify augmentation times. The inspector reviewed documentation which showed that a notification drill was held on February 28, 1985.
- e. (Closed) IFI 50-261/84-28-06: Expanding the scope of the audit of the interface with state and local support agencies. The inspector verified that the scope of the audit was expanded in this area through a review of audit checklists.