



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

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Report No.: 50-261/92-01

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

Docket Nos.: 50-260

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection Conducted: January 21-24, 1992

Inspector: *F. N. Wright* 2/5/92  
 F. N. Wright, Date Signed

Inspector: *W. M. Sartor, Jr.* 2/5/92  
 W. M. Sartor, Jr. Date Signed

Approved by: *W. H. Rankin, Jr.* 2/5/92  
 W. H. Rankin, Jr. Date Signed  
 Emergency Preparedness Section  
 Radiological Protection and Emergency  
 Preparedness Branch  
 Division of Radiation Safety and Safeguards

SUMMARY

Scope:

This routine, announced inspection was conducted to assess the operational readiness of the site emergency preparedness program, and included a review of the following program elements: (1) Emergency Plan and associated implementing procedures; (2) facilities, equipment, instrumentation, and supplies; (3) organization and management control; (4) training; and (5) independent and internal reviews and audits.

Results:

In the areas inspected, no violations or deviations were identified. Emergency facilities and equipment were properly maintained. Independent internal audits of the emergency preparedness program were a program strength. The overall conclusion of this inspection was that the emergency preparedness program was being maintained in a state of operational readiness.

## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*S. Billings, Technical Aide, Regulatory Compliance
- \*R. Chambers, Plant General Manager
- \*C. Dietz, Vice President, Robinson Nuclear Power Department
- \*M. Gann, Specialist, Emergency Preparedness
- \*R. Howell, Senior Specialist, Nuclear Assessment  
Department (NAD)
- \*P. Jenny, Manager, Emergency Preparedness
- \*J. Kloosterman, Manager, Regulatory Compliance
- T. Page, Production Assistant, Training Department
- B. Ritchie, Senior Specialist, Radiation Control Support-  
ALARA

Other licensee employees contacted during the inspection included engineers, operators, security force members, technicians, and administrative personnel.

#### Nuclear Regulatory Commission

- L. Garner, Senior Resident Inspector
- K. Jury, Resident Inspector

\*Attended exit interview

### 2. Emergency Plan and Implementing Procedures (82701)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), Appendix E to 10 CFR Part 50, and Section 5.1 of the Emergency Plan, this area was inspected to determine whether significant changes were made in the licensee's emergency preparedness program since the inspection in February 1991, to assess the impact of any such changes on the overall state of emergency preparedness at the facility, and to determine whether the licensee's actions in response to actual emergencies were in accordance with the Emergency Plan and its implementing procedures.

The inspection reviewed the licensee's system for making changes to the Emergency Plan and the Emergency Plan Implementing Procedures (EIPs). The inspector confirmed through selective review that licensee management approved revisions to the EIPs and the Emergency Plan as required. The inspector selected several recent implementing procedure changes and made random checks of controlled copies of procedures in Emergency Response Facilities (ERFs) to verify copies of the procedures were being properly maintained. Copies of the Emergency Plan and EIPs located in the Technical Support Center (TSC) and Emergency Operations

Facility (EOF) were properly controlled and contained current revisions. The inspectors noted that approximately 40% of the emergency preparedness procedures had been revised in some form in 1991. Most of the changes were minor and were made in accordance with routine procedure controls.

The inspector verified that current (i.e., updated within the past three years) letters of agreement existed between the licensee and the local governmental and medical support organizations listed in the Emergency Plan. Also verified was the licensee's conduct of the required annual review of EALs with off-site agencies.

No violations or deviations were identified.

3. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701)

Pursuant to 10 CFR 50.47(b)(8) and (9), 10 CFR 50.54(q), and Section IV.E of Appendix E to 10 CFR Part 50, this area was inspected to determine whether the licensee's ERFs and associated equipment, instrumentation and supplies were maintained in a state of operational readiness, and to assess the impact of any changes in this area upon the emergency preparedness program.

The inspector toured the following ERFs: Operations Support Center, TSC, and EOF. Selective examination of emergency equipment and supplies therein indicated that an adequate state of readiness was being maintained.

Discussions were also held with a licensee representative concerning modifications to facilities, equipment, and instrumentation since the last inspection. The inspector determined that the licensee's emergency preparedness facilities had not changed significantly in 1991 and no immediate changes were proposed.

The inspector reviewed surveillance test procedure, RST-003, Emergency Kit Inventory, Revision (Rev) 18, dated August 6, 1991 and reviewed completed surveillance documentation for various ERF emergency preparedness equipment and supplies made in the fourth quarter of 1991. A review of applicable records indicated that the equipment was being properly maintained in a state of operational readiness.

The inspector also monitored a communications check on the licensee's communication equipment to State and local authorities. The communications check was successful.

The inspector reviewed the licensee's testing program for the sirens included in the Alert and Notification System. Documentation of sirens test conducted during 1991 indicated an overall system availability of 97 percent.

Based upon ERF walk-downs, review of the Emergency Plan, inspection of completed surveillance procedures, and statements by licensee representatives, the inspector concluded that no degradation of ERF capabilities had occurred since previous inspection was made in February 1991.

No violations or deviations were identified.

4. Organization and Management Control (82701)

Pursuant to 10 CFR 50.47(b)(1) and (16), Section IV.A of Appendix E to 10 CFR Part 50, and Section 5.3 of the Emergency Plan, this area was inspected to determine the effects of any changes in the licensee's emergency organization and/or management control systems on the emergency preparedness program, and to verify that any such changes were properly factored into the Emergency Plan and EPIPs.

Due to numerous emergency preparedness program weaknesses identified by the licensee and the NRC during an emergency exercise conducted in the fall of 1991, the licensee recognized the need to reevaluate the overall effectiveness of its emergency preparedness program. To accomplish the task the licensee initiated an Emergency Preparedness Improvement Program. The program essentially called for better accountability and definition of emergency preparedness responsibilities for Emergency Response Organization (ERO) managers. As part of that plan, individual ERO managers were directed to conduct a "table top" meeting with personnel supporting their functional area. From those meetings the managers were to develop a list of required emergency preparedness tasks for which they were responsible. The improvement program tasked those ERO managers with ensuring that:

- All supporting personnel were appropriately trained to perform assigned tasks and responsibilities,
- Procedures were developed to provide an appropriate level of instruction to accomplish assigned tasks and responsibilities, and
- Initial training and retraining were adequate to ensure technical knowledge for the accomplishment of assigned tasks and responsibilities.

The managers were also required to develop a flow chart depicting the sequence for carrying out assigned tasks which was to be used for identifying inefficiencies in the functional process.

At the time of the inspection the licensee was in the process of initiating those activities and it was too early to evaluate the adequacy or implementation of the plan. However, through interviews with licensee personnel the inspector determined that the plan was receiving an appropriate level of management support and commitment.

Prior to January 1992, the site Emergency Preparedness Group consisted of an Emergency Preparedness Specialist and Senior Specialist which reported to the Manager of Emergency Preparedness and Security. As part of the Emergency Preparedness Improvement Program, the licensee moved the Emergency Preparedness function and responsibility from the Manager of Emergency Preparedness and Security to a newly created Manager of Emergency Preparedness whom reported directly to the Robinson Site Vice President. The change was made to direct additional management attention and support to the emergency preparedness program. The inspectors reviewed the qualifications of the Manager of Emergency Preparedness and determined that the employee had sufficient background experience to contribute to the improvement program. The Senior Emergency Preparedness Specialist position was recently vacated and the licensee was in the process of filling that position during the inspection.

The inspector reviewed the licensee's management strategy for ensuring compliance with the Emergency Plan requirements addressing the planning standard of 10 CFR 50.47(b)(2), which specifies that "timely augmentation of response capabilities is available." The applicable requirements were contained in Emergency Plan Section 5.3.2. The plan required the on-site emergency response organization be augmented with additional emergency response personnel within 30 to 45 minutes. The Emergency Plan stated that the on-site emergency response organization will continue to be augmented such that within 60-75 minutes after notification, additional personnel will be added to provide the necessary support and meet the intent of NUREG 0737, Supplement 1, Table 2.

The licensee conducted monthly augmentation drills through September of 1991 and quarterly thereafter to improve augmentation response capabilities. Most of the drills were conducted during normal day shift working hours with a few made just prior to or following normal work hours. The licensee demonstrated the ability to augment the emergency response staff and meet the Emergency Plan objectives in the

drills. The plan also required an augmentation drill, requiring travel to the site, be conducted at least once every 24 months. The licensee conducted an augmentation drill in 1991 in which employees were required to travel to the site. The licensee satisfactorily demonstrated the ability to augment the on-shift emergency organization in accordance with Emergency Plan requirements.

No violations or deviations were identified.

5. Training (82701)

Pursuant to 10 CFR 50.47(b)(2) and (15), Section IV.F of Appendix E to 10 CFR Part 50, and Section 5.b.1.1. of the Emergency Plan for a description of the training program and implementing procedures: PEP-653, Performance Training, Drills, and Exercises, Rev.5, dated August 4, 1988 and TI-305, Emergency Preparedness Training Program Rev. 10, dated January 10, 1992.

The licensee maintained a formal emergency preparedness training program. The status of the training program was reviewed by selecting key positions from the licensee's emergency response organization and reviewing their training records to verify training requirements were being implemented. A review of the training records for each of the selected individuals revealed that each one had received the required training and that training was current.

The licensee was in the process of evaluating the adequacy of the emergency preparedness training program as part of the Emergency Preparedness Improvement Program. In addition to determining if existing training programs were adequate and the ERO staff was properly trained, the licensee was reviewing the coaching and leadership role provided by the ERO managers staff to maintain proficiency of assigned ERO functions.

No violations or deviations were identified.

6. Independent and Internal Reviews/Audits (82701)

Pursuant to 10 CFR 50.47(b)(14) and (16) and 10 CFR 50.47(t), this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program, and whether the licensee had a corrective action system for deficiencies and weaknesses identified during exercises and drills.

Documentation of the required annual audit of the Emergency Plan and EPIPs was provided to the inspector. The review was performed during the period of June and July 1991 and

was documented in Robinson Nuclear Plant Emergency Preparedness Assessment R-EP-91-1, which was issued September 3, 1991. The assessment identified 3 adverse conditions requiring documented corrective actions. The inspector reviewed the licensee's corrective actions which were completed or on schedule for completion.

The inspector also noted that the report documented several issues that were identified as concerns and submitted to management with recommendations for consideration and action. These items were not cited as adverse conditions since they were not direct violations of licensee commitments. However, some of these findings had accurately pointed out emergency preparedness program weaknesses which could be related to emergency preparedness exercise weaknesses which were later identified in the 1991 emergency preparedness graded exercise. For example, Concern number 2 in the Emergency Preparedness Assessment R-EP-91-1 stated, in part, "...A number of the ERO members surveyed feel that they do not receive adequate training to effectively perform their duties.... The report recommended, in part, ... The managers responsible for the various areas of the ERO should assemble, train, and drill the members reporting to them on a quarterly basis to ensure a state of readiness for all members at all times... Following the fall emergency preparedness graded exercise, management involvement in the emergency preparedness training process was identified as an area needing attention and included in the Emergency Preparedness Improvement Plan. This example demonstrated the potential benefit of identifying program weaknesses in NAD reports if they are given serious consideration and review and corrective actions are made when applicable.

In conversations with the Specialist that conducted the emergency preparedness assessment the inspector determined that the NAD policy for assessment report content was changing. According to the assessor, the existing policy emphasized concise reports which would focus on adverse conditions with little or no emphasis on NAD assessor concerns. The inspector pointed out the value of the auditors findings in the licensee's emergency preparedness assessment report to licensee management, which acknowledged the value of it's assessment resources.

The licensee had an on-going NAD emergency preparedness assessment during the inspection that was scheduled to last several months during the early stages of the Emergency Preparedness Improvement Program. The inspector discussed the scope of the on-going NAD assessment with the assessor and determined that the scope was appropriate considering changing emergency preparedness activities. The inspector

reported to licensee management that NAD's assessment program for emergency preparedness program appeared to be a program strength.

No violations or deviations were identified.

7. Exit Interview

The inspection scope and results were summarized on January 24, 1992, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results. Although proprietary information was reviewed during the inspection, none is contained in this report. Dissenting comments were not received from the licensee.