



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

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Report No.: 50-261/92-26

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

Docket Nos.: 50-261

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection Conducted: September 21-25, 1992

Inspector: *F. N. Wright* *10/15/92*
 For F. N. Wright Date Signed

Approved by: *W. H. Rankin* *10/15/92*
 For W. H. Rankin, Chief 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. During the inspection the inspector also reviewed the status of the licensee's Emergency Preparedness Improvement Program and observed an Emergency Preparedness Combined Functional Drill.

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

- A. Anderson, Consultant, Paragon Technical
- *C. Baucom, Manager, Regulatory Compliance
- R. Chambers, Plant General Manager
- *C. Dietz, Vice President, Robinson Nuclear Project
- M. Gann, Specialist, Emergency Preparedness (EP)
- *R. Howell, Senior Specialist, Nuclear Assessment Department (NAD)
- R. Indelicato, Manager Corporate EP
- *P. Jenny, Manager, EP
- T. Lucas, Specialist, EP
- R. Norris, Heating Ventilation and Air Conditioning (HVAC) Specialist
- T. Page, Production Assistant, Training Department
- A. Sanders, Manager, Training Department

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

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- L. Garner, Senior Resident Inspector
- C. Ogle, Resident Inspector

*Attended exit interview

2. Status of Emergency Preparedness Improvement Program (EPIP)

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 the EPIP. Elements of the improvement program included; assessment and upgrading the EP organization, commitment to conduct monthly drills, enhancement of scenario development and drill control, use of simulator in exercises, evaluation of the appropriateness of Emergency Action Level determination process, pursuit of industry good practices, evaluation of Emergency Response Organization (ERO) responsibilities, improvement of the EP training program and ERO proficiency, and installation of additional management involvement and responsibility in the EP program.

A review of the licensee's progress in implementing the EP improvement plan was made. Most of the plan's task had been

completed with the exception of those associated with the EP training program. The licensee initially planned to have most of the EP improvement plan completed by the end of the first quarter in 1992. However, as work progressed the licensee determined that a comprehensive rework of the licensee's EP training program was needed to make significant program improvements. At the time of the inspection, most of the EPIP items were to be completed by the end of 1992. The full implementation of the new EP training program, however, was not expected to be completed until the end of 1993. The scope of the training program improvements is discussed in paragraph 6 of the inspection report.

In 1991, the licensee created a 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 EP program. In February 1992, the licensee filled a vacant EP Specialist position and added clerical support to the EP staff. The licensee had also obtained a specialist in June of 1992 to assist the training department in determining EP training program needs and improving the EP training program.

The inspector reviewed licensee records of drills which had been performed monthly in 1992. The drills included tabletop exercises and combined functional drills. The inspector noted, with the exception of one table top exercise, the licensee had done a good job documenting the results of those drills and continued to identify EP program areas needing additional improvements.

The inspector determined, through interviews with licensee personnel, that the improvement plan was receiving an appropriate level of management support and commitment.

No violations or deviations were identified.

3. 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 January 1992, 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 inspector reviewed the licensee's system for making changes to the Emergency Plan and the Plant Emergency Procedures (PEPs). The inspector confirmed through

selective review that licensee management approved revisions to the PEPs 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 PEPs located in the ERFs were properly controlled and contained current revisions. The inspectors noted that approximately 25 percent of the emergency preparedness procedures had been revised in some form in 1992. Most of the changes were minor and were made in accordance with routine procedure controls.

A licensee audit R-EP-92-02, conducted in April and May of 1992 by the Nuclear Assessment Department (NAD) staff reported, in Issue EP.1-1, that there had been insufficient attention to the quality of the EP program implementing procedures. The inspector determined that the PEPs had been exempt from a facility administrative procedure requirement to review procedures on a two year frequency for adequacy. According to the Manager of EP, the EP procedures would be included into that administrative procedure and would be subject to the two year review requirement in the future. The inspector also learned that the licensee plans to revise approximately 90 percent of their procedures in 1993 as part of the EPIP. Many procedure reviews were being made in efforts to improve the EP training program. As part of the EPIP, to increase plant management staff involvement in EP program, responsible managers would also be responsible for reviewing assigned EP procedures.

No violations or deviations were identified.

4. 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 (OSC), Technical Support Center (TSC), and Emergency Operations Facility (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 representatives concerning modifications to facilities, equipment, and

instrumentation since the last inspection. The inspector reviewed licensee plans for facility modifications to the TSC and EOF. The proposed changes were enhancements to improve facility capabilities and operability. The licensee had also initiated a project titled "Starship" which was created to improve the communication and information capabilities of the ERFs. One element of the program involved the display of information from the Emergency Response Facility Information System computer. The licensee modified the format of information presented on computer monitors to match the format utilized on facility status boards. These new formats were available and used successfully during the September 21, 1992 Combined Functional Drill. The licensee was also working on development of an electronic offsite notification message which would be assembled by various parties responsible for supplying notification message information to the facility communicators. The message would be reviewed by the Site Emergency Coordinator and transmitted by fax simultaneously to offsite agencies. The licensee expects the system to speed up the notification message process.

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 third quarter of 1992. A review of applicable records indicated that the equipment was being properly maintained in a state of operational readiness.

The inspector reviewed PEP 655, Inventory of Technical Support Center and Emergency Operations Facility Supplies and Equipment, Rev 7, dated May 7, 1992 and reviewed completed inventory documentation made after the June tabletop exercise held June 19, 1992. A review of the applicable records indicated that the equipment was being properly maintained in a state of operational readiness.

The inspector reviewed the licensee's documentation for siren testing and maintenance program. In a previous inspection an inspector identified documentation problems with the siren testing and maintenance records. The documentation of maintenance activities lacked details regarding siren conditions, siren test results, personnel performing the test, etc. The licensee documented the issue in ACR 92-207 and had taken steps to corrected the problem. The inspector determined that the maintenance of the sirens was performed by the licensee's Transmission Maintenance staff. On July 9, 1992, the Manager of EP met with the Transmission Maintenance Supervisor to improve records of siren maintenance. The parties agreed to utilize a new form to document the maintenance activities. The licensee began

using the new form later that month and the inspector reviewed completed records utilizing the new forms. All reviewed records clearly identified nature of siren problems and corrective action taken.

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 June 1992.

No violations or deviations were identified.

5. 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 PEPs.

The inspector determined that the licensee had eliminated the Headquarters Communication Center (HCC) as an emergency response organization and facility. Prior to the change, the HCC was responsible for making public information functions in the early stages of an accident before the Joint Information Center (JIC) was activated. The inspector learned that when an emergency was previously declared at a Carolina Power and Light (CP&L) facility, the public information functions would be handled by the Corporate Communications Department in the early stages until the HCC was activated. Once the HCC was activated, and a turnover was completed, the HCC would handle public information until the JIC was activated. The emergency public information function appeared to be simplified with the dissolution of the HCC. With the absence of the HCC the Corporate Communications Department would perform the public information functions in their facilities until the JIC was activated. The inspector reviewed the licensee's 10 CFR 50.54q analysis, Justification for Dissolving the HCC, and determined that the change should not impact the ability of the licensee to generate early emergency public information. The inspector learned that the licensee planned to make required changes to the Emergency Plan and include it in an annual Emergency Plan submittal for NRC approval.

No violations or deviations were identified.

6. 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, this area was inspected to determine whether the licensee's emergency response personnel were receiving appropriate EP training.

The licensee's training department, in cooperation with other facility departments, corporate office, and other CP&L sites, was engaged in a significant effort to improve the EP training program. The licensee's approach for improving the EP training program appeared comprehensive and systematic. EP training program improvement tasks included, in part, the following:

- develop and provide training for exercise weaknesses identified during the 1991 graded exercise,
- a job analysis of the ERO positions and procedures to determine the training needs,
- development of job performance measures for position qualification and job performance evaluation.
- training of managers for administering the qualification training portion of ERO training,
- development of ERO lesson plans that were job specific, and
- providing established ERO training.

The training program progress appeared steady. Some improvements in the EP training program, such as the training to correct problems identified as exercise weaknesses in 1991 and training of managers to provide training, were complete or near completion. However, some improvements, such as the development of new lesson plans, were complex or large scope with long term completion dates. The licensee planned to have the entire EP training program implemented and all training completed by the end of 1993. Licensee representatives estimated the short term training improvements were approximately 80 percent complete and the long term improvements were only about 15 percent completed. CP&L representatives reported that the training program improvements would be shared with the company's other

reactor sites to improve their EP training programs. The licensee also reported that the Nuclear Educational Training and Scheduling data base had been modified to improve the licensee's ability to monitor personnel training status.

No violations or deviations were identified.

7. 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.

The inspector reviewed the following licensee audits:

- R-EP-92-01, Robinson Nuclear Project Emergency Preparedness Program, dated February 25, 1992 and conducted January 1992, and
- R-EP-92-02, Robinson Nuclear Project Emergency Preparedness Program, dated May 28, 1992 and conducted April 13, 1992 through May 5, 1992.

R-EP-92-01 report identified several management control problems and R-EP-92-02 report identified numerous ERO training and qualification weaknesses and insufficient attention to the quality of the EP implementing procedures. Audits performed by NAD identified findings that were insightful and addressed appropriate program areas requiring improvements. The inspector reviewed the licensee's corrective actions which were completed or on schedule for completion.

The inspector discussed the scope of the next NAD assessment with the assessor and reviewed the audit inspection plan for the next EP audit. The audit scope and plan were detailed, inclusive and appropriate considering changing emergency preparedness activities. The inspector reported to licensee management that NAD's assessment program for the EP program appeared to be a program strength.

No violations or deviations were identified.

8. Follow-up of Open Items

The inspector reviewed licensee progress for the following open items; however, due to limited observation these items will not be closed and will be reviewed during the next graded exercise in November, 1992.

Exercise Weakness 50-261/91-26-03, Failure to provide complete information regarding the simulated emergency to State and local governments.

Exercise Weakness 50-261/91-26-04, Failure to demonstrate the ability to conduct damage control activities in a timely manner.

Exercise Weakness 50-261/91-26-06, Failure to demonstrate adequate assessment of the radiological consequences of the simulated accident dose assessment.

Exercise Weakness 50-261/91-26-07, Failure to fully demonstrate the formulation of protective action recommendations.

9. Emergency Preparedness Combined Functional Drill

During the inspection the licensee performed a combined functional drill which was observed by the inspector. The inspector's objectives were to review the licensee's response and interactions within the ERO during the exercise. The inspector observed good interaction between the ERF Managers and staff. Command and control in the Drill Control Room, TSC and EOF were excellent. The licensee was effective in demonstrating improved emergency response performance during their Emergency Preparedness Combined Functional Drill in the areas observed.

Strengths observed during the drill included:

- use of the Control Room Simulator in an interactive mode with players,
- prompt and correct classification of the accident conditions by the Shift Supervisor, and
- prompt staffing and activation of the ERFs.

Areas needing improvement included:

- timeliness of notifications to offsite emergency response agencies,
- message content of Notifications to offsite emergency response agencies (messages lacked important information and minor details),

- the OSC staff received minimum challenge during the exercise, and
- presentation of offsite dose information during briefings in the EOF.

The drill was the licensee's first with control room operators interacting with the simulator and appeared to improve control room exercise play. The inspector did not observe the licensee's critique process or have an opportunity to review the staff's findings concerning the drill. The inspector reported that the issues would be reviewed in the annual graded exercise with increased exercise evaluation support.

No violations or deviations were identified.

10. Licensee Response for Notification Of Unusual Event (NOUE) declared August 22, 1992

The inspector reviewed records pertaining to the emergency declarations which had occurred following the previous inspection. The records indicated that only one NOUE had been declared. On Saturday, August 22, 1992 an Unusual Event was declared at 10:25 a.m. due to a loss of offsite power. As a precautionary the licensee activated the OSC and TSC. Repairs to the start-up transformer were completed and normal power restored to the emergency busses at 12:24 a.m. on Sunday August 23, 1992. The Unusual Event was terminated at 01:24 a.m.

The inspector reviewed records pertaining to the emergency declaration which had occurred on August 22, 1992. The documentation of the event indicated that notifications to State and local governments and the NRC were made in accordance with applicable requirements and the event was properly classified. Activation and staffing of the ERFs was accomplished in accordance with the licensee's emergency plan and implementing procedures. An assessment of the ERO response and performance was made by the staff and a list of lessons learned was documented.

No violations or deviations were identified.

11. Exit Interview

The inspection scope and results were summarized on September 25, 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.