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 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Documents that util expects facility to be in full compliance w/EPA-400-R-92-001, "Manual of Protective Action Guides & Protective Actions" by 940215.

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Carolina Power & Light Company  
Robinson Nuclear Plant  
PO Box 790  
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Robinson File No.: 11720  
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United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
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H. B. ROBINSON STEAM ELECTRIC PLANT , UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
STATUS OF IMPLEMENTATION OF EPA-400-R-92-001,  
"MANUAL OF PROTECTIVE ACTION GUIDES AND PROTECTIVE ACTIONS"

Gentlemen:

This letter is to document that Carolina Power & Light Company (CP&L) expects the H. B. Robinson Plant, Unit 2 to be in full compliance with the above referenced document by February 15, 1994. The delay in implementation of EPA 400 is due to inability to commence training on EPA 400 until after the date previously scheduled for the 1993 Annual Exercise, a concurrent unplanned outage affecting availability of personnel for training, and late delivery of the dose assessment software affecting the tie into the Emergency Response Facility Information System.

The H. B. Robinson Plant, Unit 2 previously scheduled an Annual Exercise on November 30, 1993. On November 21, 1993, CP&L requested an exemption from 10 CFR Part 50, Appendix E, pursuant to 10 CFR 50.12, to defer the onsite portion of the exercise until the First Quarter of 1994. This exemption was verbally granted in a telephone call with the NRC on November 23, 1993. At the same time, an unscheduled outage has commenced which has tied up a significant portion of the Emergency Response Organization. Hence, the principal training burden for EPA 400 remains. In addition, software delays have impacted the ability for the new dose assessment software to be tied into the Emergency Response Facility Information System. The delay in implementation until February 15, 1994, will allow the ability to train and drill on the EPA 400 changes prior to the rescheduled exercise in the latter part of March, 1994.

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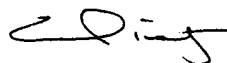
Highway 151 and SC 23 Hartsville SC

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The State of South Carolina and local governments have agreed to the following approach for an interim methodology until EPA 400 can be implemented. The principal interface with offsite agencies, who expect to implement by January 1, 1994, is the notification form and the output of dose assessment. The notification form will be implemented on January 1, 1994, as planned. Robinson Unit 2 dose assessment procedures will remain the same in the interim, and doses will be reported to offsite agencies calculated in the old manner. The State of South Carolina will, however, compare the value against the new EPA Protective Action Guides, expressed as 1 rem whole body and 5 rem child thyroid.

Questions regarding this matter may be referred to Ms. P. C. H. Jenny at (803) 383-1247.

Very truly yours,



Charles R. Dietz  
Vice President

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