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SUBJECT: Informs NRC of corrective actions taen by CP & L to eliminate areas of decreased effectiveness of emergency plan.

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Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29550

Robinson File No.: 13510
Serial: RNP/94-0268

FEB 04 1994

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON (HBR) STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REVIEW OF REVISIONS 24 AND 25 TO EMERGENCY PLAN FOR HBR STEAM
ELECTRIC PLANT

Gentlemen:

The purpose of this letter is to inform the NRC of the corrective actions taken by Carolina Power & Light Company's (CP&L) Robinson Nuclear Plant to eliminate areas of decreased effectiveness of the Emergency Plan. The NRC's review of CP&L's Emergency Plan, Revision 24, determined this revision contained changes that appeared to decrease the effectiveness of the Plan. Both of the changes in question were identified in the Emergency Action Level (EAL) Flowchart, consisting of two pages designated EAL-1 and EAL-2. The NRC letter dated December 21, 1993, requested that these EAL Flowcharts be modified to reflect Revision 3 wording in the areas of concern. Due to these findings, an additional concern was raised by your staff regarding the adequacy of the review process to assure compliance with 10 CFR 50.54(q).

EAL Flowcharts were approved by the PNSC in early January, 1994, as Revision 6 and, a telecopy was provided to the NRC. Revision 6 of the EALs incorporated the wording used in the previous Revision 3. Appropriate training has been completed with procedural approval on January 26, 1994.

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A cause determination was completed to determine how the change was approved. The first cause was determined to be the plant's 50.54(q) determination evaluation was insufficient to trigger a thorough review for the original basis. A new 50.54(q) Evaluation Review Form has been developed including instructions on use of the new Emergency Preparedness Review Form. The Emergency Preparedness (EP) Staff has completed training on the use of the new form. This change will be incorporated into procedure within the First Quarter of 1994. The second cause was that the EAL basis documentation was not consulted.

Greater emphasis has been added via the new form to ensure sufficient reviews will be performed consulting the basis document in the future.

Please refer any questions regarding this submittal to Mr. J. S. Kozyra at (803) 383-1186.

Very truly yours,



Warren J. Dorman - Acting Manager
Regulatory Affairs

DTG:lst

c: Mr. S. D. Ebnetter
Ms. B. L. Mozafari
Mr. W. T. Orders