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 AUTH. NAME AUTHOR AFFILIATION
 CLINE, W.E. Region 2 (Post 820201)
 RECIP. NAME RECIPIENT AFFILIATION
 HINNANT, C.S. Carolina Power & Light Co.

SUBJECT: Advises that Revs 26 & 27 to emergency plan inconsistent w/
 provisions of 10CFR50.47(b) & App E to 10CFR50.

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October 3, 1994

Carolina Power and Light Company
ATTN: Mr. C. S. Hinnant
Vice President
H. B. Robinson Steam Electric Plant
Unit 2
P. O. Box 790
Hartsville, SC 29550-0790

Gentlemen:

SUBJECT: REVISIONS 26 AND 27 TO EMERGENCY PLAN FOR H. B. ROBINSON PLANT,
UNIT 2, DOCKET NO. 50-261

Our review of the subject submittals has determined that Revision 26 to your Emergency Plan contains changes that appear to be inconsistent with the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50, as follows: (1) the deletion of numerical dose limits for emergency workers from Section 5.4.4.3 and the following two subsections, and (2) the addition of a provision in Section 5.6.1 which appears to permit drill participation to be considered as completely fulfilling the requirements for initial training or annual retraining of a member of the emergency response organization. A meeting at the Robinson site between P. Jenny and others of your staff and J. Kreh of my staff on September 20, 1994 resulted in a commitment to correct the Plan inconsistencies delineated above, as well as several other minor discrepancies, in Revision 28 of your Plan, which is currently expected to be issued by December 31, 1994. If your understanding of this commitment is different from that documented here, you should contact this office immediately.

In addition, a purely administrative problem with Revision 26 was that the vertical bars in the right margin used to mark Plan changes (as required by Section 5.6.2.1 of the Plan) were "lost" in the duplication process on many of the revised pages. This was a repeat of the problem encountered with Revision 24 and verbally brought to the attention of your staff at the time of our review (December 1993). Adverse Condition Report No. 94-01336 was issued on September 7, 1994 in an effort to prevent further recurrence of this defect.

With respect to Revision 27 of the Emergency Plan, our review has concluded that the changes therein meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

Please be reminded that 10 CFR 50.54(q) requires that proposed changes which decrease the effectiveness of your Emergency Plan may not be implemented without application to and approval by the Commission. However, changes may be made without Commission approval if such changes do not decrease the

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effectiveness of the Plan, and the Plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. If a change is made without approval, you should furnish copies in accordance with 10 CFR 50.54(q). Also, any changes to the Emergency Plan Implementing Procedures should be made in accordance with the requirements of Appendix E to 10 CFR Part 50.

Should you have any questions regarding this letter, please contact Mr. Kenneth P. Barr of our staff on 404-331-0335.

Sincerely,

**ORIGINAL SIGNED BY
WILLIAM E. CLINE**

William E. Cline, Chief
Radiological Protection and
Emergency Preparedness Branch
Division of Radiation Safety
and Safeguards

Docket No. 50-261
License No. DPR-23

cc: M. P. Pearson
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