

October 11, 1995

OFFICIAL RECORD COPY

Carolina Power & Light Company
ATTN: Mr. C. S. Hinnant
Vice President
H. B. Robinson Steam Electric Plant
Unit 2
3581 West Entrance Road
Hartsville, SC 29550

SUBJECT: MEETING SUMMARY - ROBINSON

Dear Mr. Hinnant:

This refers to the Emergency Preparedness (EP) meeting conducted in the Region II office on October 4, 1995. The purpose of the meeting was to discuss the upcoming revision to the Robinson Emergency Action Level (EAL). The changes would:

1. Incorporate EP memo, "Branch Position on Acceptable Deviations to Appendix 1 to NUREG-0654/FEMA-REP-1," from R. L. Emch, Acting Chief, EP Branch, Office of Nuclear Reactor Regulation.
2. Place certain terms and definitions used in EP into a procedure; as an example, Reactor Coolant System leakage.

It is our opinion that the meeting was beneficial and provided a better understanding of the issues and status of the facility.

In accordance with 10 CFR 2.790, of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely,

KS

Kenneth P. Barr, Acting Chief
Radiological Protection and
Emergency Preparedness Branch
Division of Radiation Safety
and Safeguards

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

Enclosures: (See page 2)

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Enclosures: 1. List of Attendees
2. Licensee Handout

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OFFICIAL RECORD COPY DOCUMENT NAME: P. ROBMTG.SUM

LIST OF ATTENDEES

Nuclear Regulatory Commission

- K. Barr, Acting Chief, Radiological Protection and Emergency Preparedness (RPEP) Branch, Division of Radiation Safety and Safeguards (DRSS)
- W. Sartor, Senior Radiation Specialist, Emergency Preparedness Section (EPS), RPEP, DRSS
- J. Kreh, Radiation Specialist, EPS, RPEP, DRSS
- G. Salyers, Emergency Preparedness Specialist, EPS, RPEP, DRSS

Carolina Power and Light Company

- R. Krich, Manager, Regulatory Affairs
- P. Jenny, Manager, Emergency Preparedness
- G. Johnson, NAS - Operations Assessor



PRESENTATION TO NUCLEAR REGULATORY COMMISSION REGION II

OF

PROPOSED EMERGENCY ACTION LEVEL (EAL)

ENHANCEMENTS

PRESENTED BY

ROD M. KRICH AND PAT C. H. JENNY

DATE: OCTOBER 4, 1995

BACKGROUND

- REGULATORY GUIDE 1.101 REV. 3, "EMERGENCY PLANNING AND PREPAREDNESS FOR NUCLEAR POWER REACTORS - NRC ENDORSES NUMARC EALS IN AUGUST, 1992, "LICENSEES MAY USE EITHER NUREG 0654/FEMA-REP-1 OR NUMARC/NESP-007 IN DEVELOPING THEIR EAL SCHEME BUT MAY NOT USE PORTIONS OF BOTH METHODOLOGIES."
- BRANCH TECHNICAL POSITION (BTP), "ACCEPTABLE DEVIATIONS TO APPENDIX 1 TO NUREG-0654/FEMA-REP-1" DATED JULY 11, 1994 "HOWEVER, THE PAPER DOES NOT PROVIDE A COMPREHENSIVE LIST OF POSSIBLE IMPROVEMENTS THAT COULD BE MADE THROUGH UTILIZING THE TECHNICAL BASES IN NUMARC/NESP-007. CHANGES TO LICENSEE CLASSIFICATION SCHEMES THAT ARE NOT COVERED BY THIS PAPER CAN BE EVALUATED ON THEIR INDIVIDUAL MERITS AND THEIR COMPLIMENT TO THE SCHEME AS A WHOLE."
- NEI ENDORSES THE BTP IN MAY 1995
- EP PEER GROUP DECIDES TO ADOPT THE BTP AND OTHER NUMARC CHANGES IN SUBSEQUENT EAL REVISIONS, JUNE, 1995 MAKING PRESENTATION OF RECOMMENDATION TO REG. AFFAIRS PEER GROUP IN AUGUST, 1995.
- ON 9/25/95 RECEIVED ACCEPTANCE OF CP&L'S REQUEST NOT TO INCORPORATE THE TSC INTO THE PROTECTED AREA.

IMPLEMENTATION

- PRESENT TO SITE MANAGEMENT
- DISCUSS WITH NRC REGION II
- PNSC
- CONDUCT TRAINING

PROPOSED CHANGES TO EMERGENCY ACTION LEVEL PROCEDURES, EAL-1, EAL-2, AND THE EMERGENCY ACTION LEVEL USER'S GUIDE OMM-031. THESE CHANGES ARE BASED ON A LETTER TO WILLIAM E. CLINE, DRSS/REP, REGION II FROM RICHARD L. EMCH, JR., ACTING CHIEF EMERGENCY PREPAREDNESS BRANCH. THE SUBJECT OF THE LETTER WAS "BRANCH POSITION ON ACCEPTABLE DEVIATIONS TO APPENDIX 1 TO NUREG-0654/FEMA-REP1"

BTP - BRANCH TECHNICAL POSITION PAPER
 UEM - UNUSUAL EVENT MATRIX
 SU - SYSTEMS MALFUNCTION, UNUSUAL EVENT LEVEL
 SA - SYSTEMS MALFUNCTION, ALERT LEVEL
 SS - SYSTEMS MALFUNCTION, SITE AREA EMERGENCY LEVEL

CHANGE TO EALS OR OMM-031	JUSTIFICATION
DELETE EAL-2, UEM, F-1: LOSS OF ALL REPRESENTATIVE METEOROLOGICAL DATA	BTP,#6: DUE TO THE SHIFT IN EMPHASIS FROM CLASSIFICATION BASED UPON DOSE ASSESSMENT TO CLASSIFICATION BASED UPON PLANT CONDITIONS, LOSS OF METEOROLOGICAL INSTRUMENTATION IS NO LONGER CONSIDERED TO MEET THE THRESHOLD OF AN UNUSUAL EVENT. ... IN ADDITION, LOSS OF THIS INSTRUMENTATION DOES NOT REPRESENT A SIGNIFICANT LOSS OF ASSESSMENT CAPABILITY.
ADD EAL-2, UEM, F: UNPLANNED LOSS OF 7 OR MORE ANNUNCIATOR PANELS FOR GREATER THAN 15 MINUTES	BTP, REVISIONS SU3: UNPLANNED LOSS OF MOST OR ALL SAFETY SYSTEM ANNUNCIATORS FOR GREATER THAN 15 MINUTES. THIS EAL RECOGNIZES THE DIFFICULTY ASSOCIATED WITH MONITORING CHANGING PLANT CONDITIONS WITHOUT THE USE OF A MAJOR PORTION OF THE ANNUNCIATION OR INDICATION EQUIPMENT. MOST IS DEFINED AS APPROXIMATELY 75% OF THE ANNUNCIATORS. USING 10 PANELS, 75% OF 10 IS 7.5 PANELS. HENCE 7 PANELS COMPRISES "MOST".

CHANGE TO EALS OR OMM-031	JUSTIFICATION
<p>DELETE EAL-2, UEM, J3: CONTAMINATED INJURED INDIVIDUAL REQUIRING OFF SITE MEDICAL TREATMENT</p>	<p>BTP, DELETIONS, 1: TRANSPORTATION OF CONTAMINATED INJURED INDIVIDUAL FROM SITE TO OFFSITE HOSPITAL. THIS EVENT DOES NOT MEET THE THRESHOLD OF THE EMERGENCY CLASS AND IS NOT A PRECURSOR TO A MORE SERIOUS EVENT. THE EVENT IS REPORTABLE IN ACCORDANCE WITH 10 CFR 50.72 AS A NON-EMERGENCY.</p>
<p>DELETE EAL-2, UEM, K1: UNPLANNED ECCS DISCHARGE TO VESSEL</p>	<p>BTP, DELETIONS, 7: THE EMERGENCY CORE COOLING SYSTEM (ECCS) INITIATED AND DISCHARGED TO THE VESSEL. THIS INITIATING CONDITION DOES NOT DIFFERENTIATE BETWEEN REQUIRED AND INADVERTENT ACTUATIONS OF ECCS AND, THEREFORE, ITS DISPOSITION MUST BE JUSTIFIED IN TWO PARTS. FIRST, AN INADVERTENT DISCHARGE OF ECCS TO THE VESSEL, IN AND OF ITSELF, DOES NOT REPRESENT AN EMERGENCY CONDITION. AN EVENT OF THIS NATURE IS REPORTABLE IN ACCORDANCE WITH 10 CFR 50.72. SECOND, FOR REQUIRED ECCS ACTUATIONS, VALID ECCS SIGNALS MAY BE INDICATORS OF AN RCS BARRIER CHALLENGE. CHALLENGES TO THE RCS BARRIER ARE ADEQUATELY ADDRESSED IN APPENDIX 1 OF NUREG-0654 UNDER THE DIFFERENT INITIATING CONDITIONS.</p>

CHANGE TO EALS OR OMM-031	JUSTIFICATION
<p>REWORD UEM, K,2: FROM "VIOLATION OF ANY LIMITING CONDITION FOR OPERATION ACTION STATEMENT REQUIRING SHUTDOWN" TO "INABILITY TO REACH REQUIRED SHUTDOWN WITHIN TECHNICAL SPECIFICATION LIMITS"</p>	<p>BTP, PAGE 2 "WHEN THE PLANT CANNOT BE BROUGHT TO THE REQUIRED OPERATING MODE WITHIN THE ALLOWABLE ACTION STATEMENT TIME, THEN DECLARATION OF AN UNUSUAL EVENT WOULD BE WARRANTED. THEREFORE, LICENSEES WHO PROPOSE TO ELIMINATE THE ABOVE IC"s SHOULD INCORPORATE AN IC FOR "INABILITY TO REACH REQUIRED SHUTDOWN WITHIN TECHNICAL SPECIFICATION LIMITS." THIS WORDING IS LESS AMBIGUOUS THAN THE PREVIOUS WORDING.</p>

CHANGE TO EALS OR OMM-031	JUSTIFICATION
<p>DELETE UEM, K,3: EXCEEDING OF ANY TECH SPEC SAFETY LIMIT</p>	<p>BTP, DELETIONS, #2: ABNORMAL COOLANT TEMPERATURE AND/OR PRESSURE OR ABNORMAL FUEL TEMPERATURE OUTSIDE TECHNICAL SPECIFICATIONS. PER PEM:91-0454(142) "H. B. ROBINSON TRANSITION DOCUMENT FROM NUREG-0654 TO ROBINSON EALS", TECHNICAL SPECIFICATION SAFETY LIMITS (SECTION 2.0) DESCRIBE COOLANT TEMPERATURES AND PRESSURES, AND FUEL TEMPERATURES IN ADDITION TO OTHER CRITICAL PARAMETERS. EXCEEDING TECHNICAL SPECIFICATION LIMITS FOR THE PERIOD DESIGNATED IN THE ACTION STATEMENT IS AN ANALYZED CONDITION OF THE PLANT AND DOES NOT, BY ITSELF, REPRESENT AN EMERGENCY. IF PLANT CONDITIONS ARE OUTSIDE OF TECHNICAL SPECIFICATION LIMITS AND THOSE CONDITIONS DO RESULT IN A DEGRADATION IN THE LEVEL OF PLANT SAFETY, OTHER INITIATING CONDITIONS WOULD TRIGGER AN APPROPRIATE CLASSIFICATION WITHIN AN ACCEPTABLE TIME FRAME. THUS, IN MOST CASES, LICENSEES SHOULD BE AFFORDED THE OPPORTUNITY TO RETURN PLANT PARAMETERS TO WITHIN THE TECHNICAL SPECIFICATION LIMITS AS DIRECTED BY THE ACTION STATEMENT.</p>
<p>DELETE, UEM, K,4: LOSS OF CV INTEGRITY REQUIRING SHUTDOWN BY TECH SPEC</p>	<p>BTP, DELETIONS, #3: LOSS OF CONTAINMENT INTEGRITY REQUIRING SHUTDOWN BY TECHNICAL SPECIFICATIONS EXCEEDING TECHNICAL SPECIFICATION LIMITS FOR THE PERIOD DESIGNATED IN THE ACTION STATEMENT IS AN ANALYZED CONDITION OF THE PLANT AND DOES NOT, BY ITSELF, REPRESENT AN EMERGENCY, AS DISCUSSED ABOVE.</p>

CHANGE TO EALS OR OMM-031	JUSTIFICATION
<p>DELETE, UEM, K,5: OTHER PLANT CONDITIONS EXIST THAT INVOLVE OTHER THAN A NORMAL CONTROLLED SHUTDOWN (E.G., COOL DOWN RATE EXCEEDING TECHNICAL SPECIFICATION LIMITS, PIPE CRACKING FOUND DURING OPERATION)</p>	<p>BTP, DELETIONS, #5: OTHER PLANT CONDITIONS EXIST THAT ... REQUIRE PLANT SHUTDOWN UNDER TECHNICAL SPECIFICATION REQUIREMENTS ...</p> <p>EXCEEDING TECHNICAL SPECIFICATION LIMITS FOR THE PERIOD DESIGNATED IN THE ACTION STATEMENT IS AN ANALYZED CONDITION OF THE PLANT AND DOES NOT, BY ITSELF, REPRESENT AN EMERGENCY, AS DISCUSSED ABOVE.</p>
<p>CONSOLIDATE THE UNUSUAL EVENT MATRIX FROM 11 COLUMNS TO 9 COLUMNS</p>	<p>THIS WILL ALLOW FOR BIGGER PRINT AND EASIER READING</p>
<p>REVISE EAL-1, D14-D16 TO INCLUDE DECISION BLOCKS ON LOSS OF 7 OR MORE ANNUNCIATOR PANELS WITH OR WITHOUT LOSS OF ERFIS (COMPENSATORY NON-ALARMING INDICATION) AND WITH OR WITHOUT PLANT TRANSIENT IN PROGRESS.</p>	<p>BTP, REVISIONS, SA4 AND SS6, UNPLANNED LOSS OF ALL SAFETY SYSTEM ANNUNCIATORS WITH TRANSIENT IN PROGRESS AND INABILITY TO MONITOR A SIGNIFICANT TRANSIENT IN PROGRESS.</p> <p>MAINTAINED "7 OR MORE ANNUNCIATOR PANELS" TO BE CONSISTENT WITH PREVIOUS WORDING AND TO BE IN CONSERVATIVE DIRECTION WITH RESPECT TO THE NUMBER OF PANELS VS. 75% OF THE ANNUNCIATOR PANELS. THIS EAL RECOGNIZES THE DIFFICULTY ASSOCIATED WITH MONITORING CHANGING PLANT CONDITIONS WITHOUT THE USE OF A MAJOR PORTION OF THE ANNUNCIATION OR INDICATION EQUIPMENT DURING A TRANSIENT. RECOGNITION OF THE AVAILABILITY OF COMPUTER BASED INDICATION EQUIPMENT IS CONSIDERED SINCE THIS EQUIPMENT ALLOWS THE OPERATOR TO MONITOR CHANGING CONDITIONS.</p>

CHANGE TO EALS OR OMM-031	JUSTIFICATION
<p>OMM-031 IS CHANGED TO PEP-106</p> <p>HERE AFTER OMM-031 WILL BE REFERRED TO AS PEP-106</p>	<p>THIS PROCEDURE IS THE EMERGENCY ACTION LEVEL PROCEDURE USER'S GUIDE. AS SUCH, IT IS AN IMPLEMENTING PROCEDURE FOR THE EMERGENCY PLAN WHICH INCLUDES THE EALS.</p>
<p>PEP-106, PAGE 7 4.1.7 AND PAGE 4, 1.4, ADD WORD "AREA",</p>	<p>THE PROPER PHRASE IS "SITE AREA EMERGENCY"</p>
<p>PEP-106, PAGE 10, ADD DEFINITION FOR RTGB</p>	<p>RTGB IS USED IN THE FOLLOWING PHRASE ADDITION. ADMINISTRATIVE CHANGE</p>
<p>PEP-106, PAGE 8, 4.1.10 ADD FOLLOWING WORDING "THE NET DECREASE OF RCS (AS DEFINED IN THE UFSAR, SECTION 5.0) WHICH CANNOT BE ISOLATED BY THE RTGB OR BY PROMPT LOCAL ACTION.</p>	<p>THIS WORDING CHANGE ALLOWS FOR IMMEDIATE OPERATOR ACTION TO STOP A LEAK AND CLARIFIES WHAT IS MEANT BY RCS. THOSE LEAKS WHICH ARE IDENTIFIED AND UNDER THE CONTROL OF OPERATOR ACTION DO NOT MEET THE CRITERIA FOR A LEAK WHICH NEEDS TO BE CLASSIFIED.</p>
<p>PEP-106, PAGE 22, 5.2.12 CHANGE 5 TO 7, AND DELETE APP021, AND APP022</p>	<p>TO AGREE WITH WORDING IN EAL-1 CHANGE. MOST IS DEFINED AS 75% OR GREATER. 75% OF 10 IS 7 ANNUNCIATOR PANELS. THE TWO DELETED ANNUNCIATOR PANELS WERE DELETED IN THE CONTROL ROOM MODIFICATION.</p>
<p>PEP-106, PAGE 22, 5.2.13 ADD DISCUSSION ON WHETHER ERFIS IS OPERATIONAL AND THE RESULTING DETERMINATION OF ALERT OR SITE AREA EMERGENCY DEPENDING ON IF BOTH THERE IS BOTH AN LOSS OF ERFIS AND A PLANT TRANSIENT</p>	<p>BTP, REVISIONS, SA4, SS6. THIS REFLECTS THE CHANGES MADE TO EAL-1.</p>
<p>PEP-106, PAGE 30, 5.3.8 CHANGE CARBON DIOXIDE TO AN ASPHYXIAN AND ADD GUIDANCE THAT THERE SHOULD BE POSITIVE INDICATION OF AN OXYGEN DEFICIENT AREA TO PRIOR TO ANSWERING YES</p>	<p>CARBON DIOXIDE IS CLASSIFIED TOXIC DUE TO ITS ABILITY TO DISPLACE OXYGEN. AS SUCH IT IS AN ASPHYXIAN. THE NUREG-0654 GUIDANCE IS FOR GAS THAT HAMPERS THE OPERATION OF THE PLANT. ASPHYXIAN DUE NOT HAMPER UNTIL THEY REACH SUFFICIENT ENOUGH QUANTITIES.</p>

CHANGE TO EALS OR OMM-031	JUSTIFICATION
PEP-106, PAGE 34, 5.4.5 DELETE "IF THE INCORPORATION OF THE TSC HAS BEEN COMPLETED (EITHER BY SEARCH OR DEVIATION), THEN DOWNGRADING SHOULD NOT OCCUR UNTIL AFTER TSC ACTIVATION."	THIS REFLECTS NRC REVIEW OF CP&L'S REQUEST FOR EXCEPTION REGARDING THE LOCATION OF THE TECHNICAL SUPPORT CENTER AND ITS INCORPORATION INTO THE PROTECTED AREA.

DATE	ORIGINAL CLASSIFICATION	NEW CLASSIFICATION	REASON FOR CHANGE IN CLASSIFICATION
1994			
MARCH 19	UNUSUAL EVENT >10 GPM THROUGH HCV-142		NOT PART OF THE RCS AND ISOLABLE
JUNE 6	ALERT FIRE ON EDG		OMM-031 CHANGE SAYS THAT A FIRE ON THE EXHAUST MANIFOLD THAT DOES NOT AFFECT EDG OPERABILITY AND IS EASILY EXTINGUISHED DOES NOT HAVE THE POTENTIAL TO AFFECT SAFETY RELATED EQUIPMENT
AUGUST 2	UNUSUAL EVENT PORV ON PRESSURIZER DID NOT RESEAT BELOW SET POINT	UNUSUAL EVENT	
1995			
FEB 13	ALERT CARBON DIOXIDE RELEASE IN PIPE ALLEY		WHEN MEASUREMENTS WERE MADE IT WAS NOT AN OXYGEN DEFICIENT ATMOSPHERE AND THERE WAS NO POSITIVE INDICATION THAT IT EVER WAS
APRIL 11	UNUSUAL EVENT RCS LEAKAGE GREATER THEN 10 GPM RHR OST 254		NOT PART OF RCS
JUNE 20	ALERT RCS LEAKAGE GREATER THEN 50 GPM CHARGING PUMP RELIEF VALVE		NOT PART OF RCS AND ISOLABLE
JULY 24	UNUSUAL EVENT RCS LEAKAGE GREATER THEN 10 GPM "C" AND "A" CHARGING PUMPS		NOT PART OF RCS AND ISOLABLE

SURRY, OCONEE, CRYSTAL RIVER, AND HNP USE JUST RCS -NOT CVCS/RHR