



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W., SUITE 2900
ATLANTA, GEORGIA 30323-0199

May 3, 1995

Report No.: 50-261/95-11

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

Docket No.: 50-261

License No.: DRP-23

Facility Name: H. B. Robinson Steam Electric Plant, Unit 2

Inspection Conducted: April 3-7, 1995

Inspector: A. Gooden
for J. L. Kreh, Radiation Specialist

05-02-95
Date Signed

Approved by: K. P. Barr
K. P. Barr, Chief
Emergency Preparedness Section
Radiological Protection and Emergency Preparedness Branch
Division of Radiation Safety and Safeguards

5/2/95
Date Signed

SUMMARY

Scope:

This special, announced inspection was conducted to assess the operational readiness of the site emergency preparedness program through selective review of the following programmatic areas: (1) emergency response training, (2) emergency notifications and communications, and (3) protective action decision-making.

Results:

In the areas inspected, no violations or deviations were identified. Program strengths included very good performance in walk-throughs with individuals designated as Site Emergency Coordinators and Emergency Communicators, and significant upgrades in the ergonomics and equipment capability of the Technical Support Center and Emergency Operations Facility. Areas for potential improvement included addressing the following items: (1) inclusion in the Emergency Plan of the scheme for developing protective action recommendations (see Paragraph 2 for details); (2) unfamiliarity of Emergency Communicators with a particular aspect of the 10 CFR 50.72 requirement for NRC notification of an emergency declaration (Paragraph 3); and (3) inconsistencies between the Emergency Plan implementing procedures and

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some instructional material used in the training of nonlicensed emergency response personnel (Paragraph 4). Appropriate corrective actions for items (2) and (3) were completed by the licensee after the onsite phase of the inspection, with suitable confirmatory documentation provided to the inspector.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

D. Akers, Senior Reactor Operator
*D. Baur, Senior Specialist, Emergency Preparedness
*B. Clark, Manager, Maintenance
*H. Curry, Senior Specialist, Training Department
*M. Gann, Acting Manager, Emergency Preparedness
*D. Gudger, Senior Specialist, Regulatory Programs
G. Healey, Auxiliary Operator
W. Hensley, Senior Training Specialist
*C. Hinnant, Vice President, Robinson Plant
*P. Jenny, Manager, Emergency Preparedness
*K. Jury, Manager, Licensing/Regulatory Programs
*R. Krich, Manager, Regulatory Affairs
*F. Lowery, Manager, Work Control
*J. Lucas, Manager, Technical Training
*B. Meyer, Operations Manager
*G. Miller, Manager, Robinson Engineering Support Section
*R. Moore, Manager, Outages
*P. Musser, Manager, Plant Operations Assessment
S. Poteet, Senior Specialist, Requalification Training Program
*R. Steele, Manager, Shift Operations
*G. Walters, Manager, Support Training
*D. Whitehead, Manager, Plant Support Services
*T. Wilkerson, Manager, Environmental and Radiation Control
D. Young, Plant General Manager

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

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*W. Orders, Senior Resident Inspector

*Attended exit interview on April 7, 1995

An index of abbreviations used throughout this report will be found in the last paragraph.

2. Protective Action Decision-Making (82202)

This area was inspected to determine whether the licensee was maintaining a continuous capability to (a) assess emergency conditions, (b) make appropriate recommendations to governmental officials to protect the public, and (c) take appropriate measures to protect onsite workers in the event of an emergency. Regulatory bases applicable to this area are found in 10 CFR 50.47(b)(9) and (10), Section IV.D.3 of Appendix E to 10 CFR Part 50, and Section 5.4.4 of the Emergency Plan.

The inspector determined through review of the Emergency Plan and PEPs that authority and responsibility for accident assessment and protective action decision-making were clearly assigned and were available on a 24-hour basis. Interviews conducted by the inspector disclosed that ERO personnel understood their authorities and responsibilities with respect to accident assessment and protective action decision-making.

Walk-through evaluations involving protective action decision-making were conducted with two teams (see Paragraph 4 for details of the conduct of these evaluations). The Site Emergency Coordinator for each team was aware of the range of PARs available for protection of the public and was cognizant of appropriate onsite protective actions.

During review of the Emergency Plan, the inspector noted a significant discrepancy in that the methodology for developing a PAR in the event of a General Emergency declaration was not contained in the Plan. The Plan simply referenced PEP-105, "General Emergency", for the details of the decision-making process for deriving a PAR to evacuate or shelter the public. However, 10 CFR 50.47(b)(10) specifies that an Emergency Plan must provide "guidelines for the choice of protective actions during an emergency, consistent with Federal guidance." Exclusion of the licensee's PAR methodology from the Plan placed the scheme outside the framework of the NRC's formal licensing process for evaluating changes to the Emergency Plan. With this understanding of the NRC's position in the matter, licensee management planned to revise the Emergency Plan by May 31, 1995 to incorporate the details of the method for deriving a PAR.

No violations or deviations were identified.

3. Notifications and Communications (82203)

This area was inspected to determine whether the licensee was maintaining a capability for notifying and communicating with plant personnel, offsite support agencies and authorities, and the population within the 10-mile EPZ. Regulatory bases applicable to this area are found in 10 CFR 50.47(b)(5) and (6), Section IV.D of Appendix E to 10 CFR Part 50, and Section 5.5 of the Emergency Plan.

The inspector reviewed the licensee's notification procedure PEP-171, "Emergency Communicator and Staff". That procedure contained emergency notification message forms (one for State and county officials, another for the NRC) and specified when to notify and activate the onsite emergency organization, corporate support organization, and offsite agencies. The procedure was consistent with the emergency classification scheme used by the licensee. The "Emergency Notification Form", used in transmitting information to State and local emergency management officials, was consistent with the guidance in NUREG-0654, Sections II.E.3 and II.E.4.

Interviews with two Site Emergency Coordinators, each assisted by an Emergency Communicator (see Paragraph 5 for details regarding the conduct of these interviews), verified that each team understood the requirements for notifying State and local authorities and the NRC in the event of a declared emergency. During walk-through evaluations, each of the Emergency Communicators performed satisfactorily and helped facilitate the timely implementation of the applicable PEPs. Interviewees demonstrated sensitivity and responsiveness to the time limitations for notifications of offsite authorities. However, it was not clear from these interviews that the Emergency Communicators were aware of the requirement in 10 CFR 50.72(a)(3) to "notify the NRC immediately after notification of the appropriate State or local agencies and not later than one hour after the time the licensee declares one of the Emergency Classes" [emphasis added]. The Emergency Communicators appeared to be familiar only with the "one hour" aspect of the requirement. Subsequent to the closing date of the onsite inspection, the licensee provided the inspector with a copy of an April 22, 1995 internal memorandum (received on April 26, 1995) to designated Emergency Communicators which reminded the subject personnel of the NRC notification requirement quoted above. This action, together with the licensee's intention of henceforth addressing the notification issue during training for Emergency Communicators, satisfactorily resolved the matter under discussion.

The inspector reviewed records of weekly and monthly surveillances of communications equipment which were conducted in accordance with PEP-103, "Emergency Preparedness Periodic Tests". This equipment included the Selective Signaling System, Local Government Radio System, FTS 2000 (ENS), and radio pagers used for off-hours notification of the ERO. These records indicated that communications problems, when identified, were expeditiously corrected. The inspector conducted operability checks of selected communications equipment at the Control Room, TSC, and EOF. No problems were noted.

The management control program for the public notification system (sirens) was reviewed. According to documentation and discussions with a licensee representative, the system consisted of 45 sirens located within the 10-mile EPZ in the counties of Darlington, Lee, and Chesterfield. Licensee documentation prepared for the Federal Emergency Management Agency on the results of siren tests (full cycle, silent, and growl) for calendar year 1994 indicated an overall system availability of 98.2%.

No violations or deviations were identified.

4. Knowledge and Performance of Duties (Training) (82206)

This area was inspected to determine whether ERO personnel understood their response roles and could perform their assigned functions. Regularity bases applicable to this area are found in 10 CFR 50.47(b)(15), Section IV.F of Appendix E to 10 CFR Part 50, and Section 5.6 of the Emergency Plan.

In an effort to gauge the effectiveness of the emergency response training program, the inspector conducted separate interviews with two teams, each of which included a Site Emergency Coordinator (a Senior Reactor Operator and the Plant General Manager, respectively) and an Emergency Communicator. Each 90-minute interview began with technical questions relating to the duties, responsibilities, and functions of the individuals during an emergency situation, and then presented two accident scenarios that required classification, preparation of a notification message, and formulation of a PAR. The inspector delineated the guidelines for the interview at the outset, including the "open book" nature of the evaluation. The Acting Emergency Preparedness Manager was present during each of the interviews to allow for confirmation and firsthand understanding of observations. From an overall perspective, each of the two teams demonstrated excellent understanding of their duties and responsibilities in the event of an emergency. The only issue arising from these interviews was the timeliness requirement for notification to the NRC of an emergency declaration, as discussed previously in Paragraph 3.

The inspector reviewed detailed outlines and lesson plans used in the training of selected ERO positions. Generally, the training materials were comprehensive and accurate. However, factual discrepancies were noted during this review with respect to lesson plans that apparently had been used in classroom training without appropriate modifications to account for revisions such as those involving EALs and emergency worker dose limits. A licensee representative informed the inspector of a mechanism already in place to insure that the Training Department promptly received revisions to the PEPs when issued so that training modules could be corrected as necessary. The licensee was in the process of rectifying the existing discrepancies, but completion of this task was at least several months away. In reaction to the inspector's expressed concern regarding this situation, the licensee undertook a near-term effort to revise those lesson plans for ERO training which had not been appropriately updated at the time of the inspection. Subsequent to the closing date of the onsite inspection, the licensee provided the inspector with revised instructor lesson plans for 23 modules used in ERO training (received on April 26, 1995). Based upon selective review of this material, the inspector determined that the licensee's action satisfactorily resolved the matter under discussion.

No violations or deviations were identified.

5. Licensee Action on Previous Inspection Findings

- a. (Closed) IFI 50-261/93-09-03: Reviewing Corrective Action Program for emergency preparedness-related deficiencies.

The controls and timeliness for corrective actions in emergency preparedness appeared to have been improved through use of the plant-wide Corrective Action Program. The Emergency Preparedness

staff was no longer using its own internal program to track items for corrective action.

- b. (Closed) URI 50-261/94-19-01: Review respiratory equipment qualification for ERO personnel.

In response to concerns raised by the Resident Inspectors, the licensee generated ACR No. 94-01204 on August 15, 1994. This ACR resulted in an extensive evaluation of the need for respiratory qualification on a position-specific basis. These efforts resulted in improvements to PEP-004, "ERO Qualification", Revision 2, effective February 16, 1995, which appeared to satisfactorily resolve this issue. No violation or deviation of regulatory requirements was found.

6. Exit Interview

The inspection scope and results were summarized on April 7, 1995 with those persons indicated in Paragraph 1. The inspector described the areas assessed and discussed the inspection results in detail, including the three areas for improvement reported in the "Results" section at the beginning of this report. The plan to implement corrective action as delineated in Paragraph 2 was confirmed by licensee management. No violations or deviations were identified, and no new items will be formally tracked by the NRC. Dissenting comments were not received from the licensee. Although proprietary information was reviewed during this inspection, none is contained in this report. The following list summarizes the status of items being tracked by the NRC in the area of emergency preparedness:

<u>Type</u>	<u>Number</u>	<u>Status</u>	<u>Description and Reference</u>
IFI	50-261/93-09-03	Closed	Reviewing Corrective Action Program for emergency preparedness-related deficiencies (Paragraph 5.a)
URI	50-261/94-19-01	Closed	Review respiratory equipment qualification for ERO personnel (Paragraph 5.b)

10. Index of Abbreviations Used in This Report

ACR	Adverse Condition Report
CFR	Code of Federal Regulations
EAL	Emergency Action Level
ENS	Emergency Notification System
EOF	Emergency Operations Facility
EPZ	Emergency Planning Zone
ERF	Emergency Response Facility
ERO	Emergency Response Organization

FTS Federal Telecommunications System
IFI Inspector Followup Item
NRC Nuclear Regulatory Commission
OSC Operational Support Center
PAR Protective Action Recommendation
PEP Plant Emergency Procedure
TSC Technical Support Center
URI Unresolved Item