APPENDIX B

TO FACILITY OPERATING LICENSE NO. DPR-23

H. B. ROBINSON NUCLEAR STEAM ELECTRIC PLANT

UNIT 2

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

ENVIRONMENTAL PROTECTION PLAN

8103240215

H. B. ROBINSON NUCLEAR STEAM ELECTRIC PLANT
UNIT 2

ENVIRONMENTAL PROTECTION PLAN
(Non-Radiological)

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1.0 OBJECTIVES OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) is to provide for protection of environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Coordinate NRC requirements and maintain consistency with other Federal, State, and local requirements for environmental protection.

(2) Keep NRC informed of the environmental effects of facility operation and of actions taken to control those effects to the extent required by existing permits.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's NPDES permit.

2.0 ENVIRONMENTAL PROTECTION ISSUES

In the FES-OL dated April 1975, the Staff considered the environmental impacts associated with the continued operation of the H. B. Robinson Nuclear Steam Electric Plant, Unit 2. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

In the FES-OL, the Staff identified the need for an ecological monitoring program to verify that continued operation does not significantly increase the level of impacts on the ecological parameters considered by the Staff in its assessments (FES-OL Section 5.5.2.5). For the above purpose, the Staff found the licensee's demonstration program, as proposed to EPA pursuant to Section 316 of the Clean Water Act, to be acceptable with the following additional requirements:

(i) Implementation of a Staff-approved program for collection of fish impingement and ichthyoplankton entrainment data, and

(ii) Continuation of the ecological monitoring program for a minimum period of two years (FES-OL Section 6.2.3).

The licensee has conducted the EPA-approved Section 316 program which addressed both of the additional requirements recommended by the Staff. The Regional Administrator of EPA Region IV has found the plant to be in compliance with Section 316(a) and Section 316(b) based on the licensee's demonstration program.

The NRC will rely on the EPA and the State of South Carolina for the continued protection of the aquatic environment from non-radiological operational impacts via the NPDES permit and State certification.

2.2 Terrestrial Issues

With regard to terrestrial impacts, the Staff concluded in the FES-OL that continued operation of the plant and its associated transmission system would result in an acceptable level of impact (FES-OL Section 5.5.1.3). Monitoring of terrestrial biota in the vicinity of Robinson Lake was included as a part of the licensee's successful demonstration program under Section 316(a) of the Clean Water Act. There were no issues raised via the study results which would necessitate further monitoring of terrestrial biota.

The Staff has identified the need for controlled use of herbicides if such are used for maintenance of transmission rights-of-way. NRC requirements with regard to this terrestrial issue are specified in Subsection 4.2 of this EPP.

3.0 CONSISTENCY REQUIREMENTS

3.1 Plant Design and Operation

Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which require an amendment or revision to the facility NPDES permit (as it relates to Unit 2), the licensee shall prepare and record an environmental evaluation of such activity in accordance with any requirements of the NPDES permit. Under such circumstances, the licensee will be required to submit copies of its amended NPDES application to the NRC.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection in accordance with record keeping requirements of Section 5.2. To the extent licensee submits environmental operating reports on a prescribed frequency to other State or Federal agencies, copies will be provided to the NRC.

3.2 Reporting Related to the NPDES Permits and State Certifications

Violations of the NPDES permit or the State certification (pursuant to Section 401 of the Clean Water Act) shall be reported to the NRC by

providing copies of the reports which are submitted in accordance with the NPDES permit or certification. The licensee shall also provide the NRC with copies of the results of the following studies at approximately the time they are submitted to the permitting agency:

(i) Section 316 studies, if required for NPDES permit renewal;

(ii) Chlorine Minimization Study;

(iii) Other biological studies which are submitted to the NPDES permitting agency.

Changes and additions to the NPDES permit or the State certification shall be reported to the NRC within approximately 30 days following the date the licensee is notified in writing of the approved change. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within approximately 30 days following the date the stay is granted.

The NRC shall be notified of changes to the effective NPDES permit proposed by the licensee by providing NRC with a copy of the proposed change at approximately the time it is submitted to the permitting agency. The notification of a licensee-initiated change shall include a copy of the requested revision submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES permit at approximately the time the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulation

Changes in plant design or operation and performance of tests of experiments which are required to achieve compliance with other Federal, State, or local environmental regulations are not subject to the requirements of Section 3.1