



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

JUL 02 1987

Report No.: 50-261/87-18

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

Docket No.: 50-261

License No.: DPR-23

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

Inspection Conducted: June 8-12, 1987

Inspector: James L. Kreh 30 June 1987  
 J. L. Kreh Date Signed

Approved by: Thomas R. Decker 30 June 1987  
 T. R. Decker, Chief Date Signed  
 Emergency Preparedness Section  
 Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine, unannounced inspection involved review and evaluation of the licensee's emergency preparedness program.

Results: No violations or deviations were identified.

8707130186 870702  
 PDR ADOCK 05000261  
 Q PDR

## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*G. P. Beatty, Vice President, Robinson Nuclear Project Department
- \*B. G. Rieck, Manager, Control and Administration
- \*D. Gainey, Senior Specialist, QA/QC
- \*G. A. Walters, Project Engineer, Onsite Nuclear Safety
- \*M. C. Morrow, Senior Specialist, Emergency Preparedness (Plant)
- \*B. D. McFeaters, Senior Specialist, Emergency Preparedness (Corporate)
- \*D. A. Sayre, Senior Specialist, Regulatory Compliance
- \*S. A. Griggs, Aide, Regulatory Compliance
- J. L. Buckingham, Shift Technical Advisor
- R. O. Moore, Shift Foreman
- S. E. Wallace, Technical Aide, Emergency Preparedness
- W. R. Thorsen, Emergency Preparedness Trainer (Contractor)
- G. J. Bowen, Training Assistant

Other licensee employees contacted included technicians and office personnel.

#### NRC Resident Inspectors

- \*H. E. P. Krug
- \*R. M. Latta

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on June 12, 1987, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed the inspection findings. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

### 3. Licensee Action on Previous Enforcement Matters (92702)

(Closed) Violation 50-261/86-21-03: Failure to provide appropriate training to certain emergency response personnel in accordance with the Radiological Emergency Plan, its implementing procedures, and applicable regulatory requirements. The inspector reviewed the licensee's initial and follow-up responses (dated October 17, 1986 and February 3, 1987, respectively) to the Notice of Violation. The emergency call-out roster

in procedure PEP-204 was revised to designate personnel for the functions of accident assessment and damage control. Review of training records confirmed that specialized initial training for these personnel was completed as described in the licensee's submittal of February 3, 1987.

4. Emergency Plan and Implementing Procedures (82701.01)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), Appendix E to 10 CFR Part 50, and Section 5.6 of the licensee's Radiological Emergency Plan (REP), this area was inspected to determine whether significant changes were made in the licensee's emergency preparedness program since the last routine inspection (August 1986), and to assess the impact of any such changes on the overall state of emergency preparedness at the facility.

Discussions with licensee representatives indicated that several significant changes in the emergency preparedness program were made since August 1986. These changes were considered to improve or upgrade the program and are delineated in Paragraphs 5, 6, and 7, below.

The inspector reviewed the licensee's program for making changes to the REP and the Plant Emergency Procedures (PEPs), which served to implement the REP. The inspector verified that changes to these documents were reviewed and approved by management and, if substantive, by the Plant Nuclear Safety Committee. A review of records showed that all such changes were submitted to the NRC within 30 days of the effective date, as required.

The inspector reviewed the licensee's program for distribution of changes to the REP and PEPs. Document Control records showed that appropriate personnel and organizations were sent copies of changes to the REP and PEPs during the period September 1986 through April 1987. Current versions of those documents were observed to be available in the Control Room, Technical Support Center, and Emergency Operations Facility.

No violations or deviations were identified.

5. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701.02)

Pursuant to 10 CFR 50.47(b)(8) and (9), 10 CFR 50.54(q), and Section IV.E of Appendix E to 10 CFR Part 50, this area was inspected to determine whether the licensee's emergency response facilities and other essential emergency equipment, instrumentation, and supplies were maintained in a state of operational readiness.

The inspector toured the onsite emergency response facilities, including the Control Room, Technical Support Center (TSC), Operational Support Center (OSC), and Emergency Operations Facility (EOF). As of March 31, 1987, the licensee had completed the physical and security arrangements required to provide the capability of "moving" the TSC from outside to

inside the Protected Area upon activation of that facility. On the same date, the licensee's Safety Parameter Display System was declared operational. The licensee planned to factor these changes into the REP and PEPs as soon as possible.

The area within the Maintenance Shop designated for OSC activities was expanded to generally improve the function of that facility. These changes were incorporated into Revision 2 (dated October 27, 1986) of PEP-162, "OSC Leader."

The emergency kits in the Control Room and OSC were inspected and found to be complete and well organized. A copy of the most recent inventory, conducted in accordance with the applicable surveillance test procedure, was included in each kit.

The inspector reviewed records of monthly tests (August 1986 through June 1987) of selected primary and backup communications systems used in the TSC and EOF, including the Emergency Notification System (ENS), the licensee's Emergency Telephone System (which included the Automatic Ring-Down to the State and counties), and the South Carolina Emergency Preparedness Division radio system. The records showed that problems and deficiencies identified during the tests were resolved expeditiously.

No violations or deviations were identified.

6. Organization and Management Control (82701.03)

Pursuant to 10 CFR 50.47(b)(1) and (16), Section IV.A of Appendix E to 10 CFR Part 50, and REP Section 5.6, this area was inspected to determine the effects of any changes in the licensee's emergency organization and/or management control systems on the emergency preparedness program and to verify that such changes had been properly factored into the REP and PEPs.

The organization and management of the emergency preparedness program were reviewed and discussed with licensee representatives. The inspector was informed that the licensee recently designated three members of its corporate emergency preparedness staff as Project Specialists. Each Specialist was assigned to provide dedicated support (a significant percentage of which was to be contributed onsite) to one of the licensee's three nuclear power facilities. Activities planned by the Project Specialists included implementing computerized systems to track required corrective actions, assisting in exercise scenario development, and instituting various improvements in the emergency preparedness program. Another organizational change was the recent transfer of responsibility for the onsite emergency preparedness training program from the Emergency Preparedness Specialist to the Nuclear Training Section. Licensee representatives stated that this change in assignment of responsibility will be factored into the REP and applicable PEPs in the near future. The changes discussed above appeared to represent decided improvements in the emergency preparedness program. The inspector's discussion with licensee representatives disclosed that there were no significant changes in the

organization and staffing of the offsite support agencies since the last inspection.

No violations or deviations were identified.

7. Training (82701.04)

Pursuant to 10 CFR 50.47(b)(2) and (15), Section IV.F of Appendix E to 10 CFR Part 50, REP Section 5.6.1.1, and PEP-653 ("Performance of Training, Exercises, and Drills"), this area was inspected to determine whether the licensee's key emergency response personnel were properly trained and understood their emergency responsibilities.

The inspector reviewed the REP description of the training program as well as training procedures and selected lesson plans, and interviewed members of the instructional staff. The licensee was in the process of significantly upgrading the emergency response training of plant personnel by replacing the self-study program with formal classroom training. Licensee representatives stated that 7 of 10 instructional modules for emergency response training were either in final, approved form or nearly complete. The new program was scheduled to be fully implemented by September 30, 1987. The inspector reviewed the most recent revision (dated April 10, 1987) of the emergency preparedness training schedule, and a matrix which specified the training module requirements for each position in the onsite emergency response organization.

Records of training for selected members (both licensed and nonlicensed) of the emergency organization for the period June 1986 to May 1987 were reviewed. The training records revealed that those personnel, including some designated as alternates in the emergency organization, were provided with appropriate training, and that the type, amount, and frequency of training were consistent with requirements.

The inspector conducted a walk-through with a Shift Foreman on duty in the Control Room. This individual was given various hypothetical sets of emergency conditions and plant data and was asked in each case to talk through the response he would provide as Site Emergency Coordinator if such an emergency actually existed. The individual exhibited considerable familiarity with emergency procedures and equipment. No problems were observed in the areas of emergency classification and protective action decision-making.

No violations or deviations were identified.

8. Independent Reviews/Audits (82701.05)

Pursuant to 10 CFR 50.47(b)(14) and (16) and 10 CFR 50.54(t), this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program, and whether the licensee had a corrective action system for deficiencies and weaknesses identified during exercises and drills.

Records of emergency preparedness program audits were reviewed. The records showed that the most recent independent audit of the program was conducted by the licensee's Quality Assurance Department on June 16-20, 1986, as documented in Audit Report No. QAA/0020-86-05, dated July 1, 1986. This audit fulfilled the 12-month frequency requirement for such audits. The audit records showed that the State and local government interfaces were evaluated, and that findings concerning the interfaces were communicated to State and local government authorities. Audit findings and recommendations were presented to plant and corporate management. A review of past audit reports indicated that the licensee complied with the five-year retention requirement for such reports.

The REP and PEPs required critiques following exercises and drills. Licensee documentation showed that critiques were held following periodic drills as well as the annual emergency preparedness exercise. The records showed that deficiencies were discussed in the critiques, and recommendations for corrective action were made.

The licensee's program for follow-up action on audit, drill, and exercise findings was reviewed. Inspection of licensee records indicated that corrective action was taken on identified problems, as appropriate. The licensee had established a tracking system called the Regulatory Action Items List (RAIL) as a management tool for ensuring follow-up on actions taken in deficient areas. During the inspection, the licensee also implemented an Emergency Preparedness Tracking System to ensure follow-up on licensee evaluators' minor exercise findings, which were not tracked on the RAIL. The inspector noted that neither tracking system captured deficiencies and weakness identified during drills. The licensee agreed to include findings from training drills on the new tracking system to ensure the implementation of appropriate corrective actions.

No violations or deviations were identified.

9. Inspector Follow-up (92701)

- a. (Closed) Inspector Follow-up Item (IFI) 50-261/85-29-01: Clarifying training elements in procedures and study guides. As discussed above in Paragraph 7, the new training program addressed this finding by defining the modular requirements for each emergency response position.
- b. (Closed) IFI 50-261/86-21-01: Rectifying the one-hour notification time for the Notification of Unusual Event classification. Revision 7 of PEP-102 required 15-minute notification of State and county governmental authorities.
- c. (Closed) IFI 50-261/86-21-02: Incorporating the new notification procedures into the REP and PEPs. Appropriate revisions were made to REP Section 5.3.5 and PEP-102 through PEP-105.

## 10. Information Notices (92717)

The following Information Notices (INs) were discussed with licensee representatives to ensure that receipt, management review, and appropriate corrective action had occurred.

- a. IN 85-80 (Timely Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications): The licensee's procedures called for use of an available operator as Offsite Communicator in the Control Room, and for an experienced technical staff member (primary and two alternates named in PEP-204) as State/NRC Communicator in the TSC. In all cases, persons serving as communicators would have received specialized training for their positions.
- b. IN 86-97 (Emergency Communications System): PEP-204 specified a dedicated ENS communicator. Testing of ENS and Health Physics Network telephones was performed monthly by the licensee. The backup commercial telephone numbers for the NRC Operations Center were incorporated via Revision 6 of PEP-205.
- c. IN 86-98 (Offsite Medical Services): The licensee had arranged a 4-day training session in August 1987 for medical personnel from Byerly Hospital (primary) and Wilson Clinic and Hospital (backup). Instruction by REAC/TS staff was planned to be included. Retraining for hospital personnel was scheduled to be given annually.