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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
 AUTH. NAME AUTHOR AFFILIATION
 UTLEY, E. E. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 EISENHUT, D. G. Division of Licensing

SUBJECT: Forwards descriptions of plant emergency ctrs to meet end-of-yr requirements & commitments. Util not planning to construct new facilities. Existing structures will serve functions.

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Carolina Power & Light Company

June 18, 1980

File: NG-3514(R)

Serial No.: NO-80-925

Mr. D. G. Eisenhower, Director
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
EMERGENCY CENTERS

Dear Mr. Eisenhower:

The purpose of this letter is to describe to you and your staff Carolina Power & Light Company's (CP&L) intentions with regard to plant emergency centers which must be constructed or established to meet end of the year commitments and requirements. The plans described herein are based on our understanding of the published guidance¹ presently available, discussions with the NRR Short Term Lessons Learned Implementation Teams and NRR Emergency Planning Teams, and our telephone conversation with your staff on May 13, 1980.

As discussed in the attachment, CP&L is not planning to construct a single Emergency Operations Facility (EOF) as described in your April 25, 1980 letter. Instead, our Recovery Center, Media Center and Local Emergency Operations Center will be established to fulfill the same functions as an EOF. Utilizing these facilities rather than constructing an EOF is a desirable option for the following reasons:

1. It utilizes facilities which are already included in State and Local Emergency Preparedness planning for all types of emergencies.
2. All the functional capabilities of NRC guidance are met by use of these existing structures for recovery, media briefing and local emergency operations.

1. Reference a) D. G. Eisenhower's letter of September 13, 1979.
b) H. R. Denton's letter of October 30, 1979.
c) D. G. Eisenhower's letter of April 25, 1980.

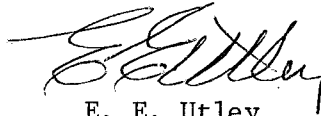
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June 18, 1980

The establishment of three facilities was discussed with State and Local officials during the development of the CP&L Corporate Emergency Plan. They fully concur in our method of providing the required functions, as described herein.

CP&L is proceeding with the construction and establishment of these facilities in order to meet our commitments. If you or your staff have any concerns about the plans described above, you are requested to contact us by July 3, 1980. Any delay beyond that date may result in our scheduled completion not being commensurate with your requirements.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply
and
Engineering & Construction

JJS/jcb

Attachment

cc: Mr. J. D. Neighbors (NRC)

H. B. ROBINSON, UNIT #2
DESCRIPTION OF EMERGENCY RESPONSE FACILITIES

The Emergency Response Facilities which this Company will use at the H. B. Robinson plant were planned to provide a full spectrum of support for the affected plant and surrounding area. We have developed a comprehensive, flexible response complex which facilitates coordinated action by Company, National, State and Local Authorities while providing support to the news media and enhancing receipt of support from outside organizations such as NSSS Vendors, A/E's, etc. The control room meets wide accident spectrum habitability criteria and the On-Site Technical Support Center meets habitability requirements as described later.

The entire emergency response complex will be linked by a comprehensive communications network. The network hardware uses Bell systems, the Company microwave net, data links, and radio to provide: (a) voice communication through normal telephone use, automatic ringdown (hot line) between selected centers, conference call capability, speaker phones and operator assistance where required; (b) radio communications between selected Company vehicles (Radiation Monitoring, Corporate Management, Health Physics) and appropriate fixed locations, as well as with State mobile units and fixed locations; (c) facsimile and telex transmission; (d) data transmission via data link.

Specific information about each of the Emergency Response Facilities and their role in time of an emergency is set forth below:

Control Room

The function of the control room at H. B. Robinson is plant control. Adequate instrumentation, controls, and communications are provided for this purpose. Control room personnel will have direct access to telephone, radio, and data communications (CRT) facilities; however, every effort will be made to route incoming communications to the on-site Technical Support Center, thereby shielding the control room personnel from outside interference while allowing them free access to outside assistance if required.

Wide accident spectrum habitability standards as described in the FSAR are met for the control room. The location and internal configuration are shown in the H. B. Robinson FSAR, Figure 1.2-6.

Emergency personnel who will operate the control room area are the Emergency Coordinator and Emergency Team. The shift foreman will serve as the Emergency Coordinator until properly relieved by the plant Operations and Maintenance Manager. The Operations and Maintenance Manager will be assisted by the Shift Operating Supervisor, Shift Foreman, Licensed and Auxiliary Operators and Security Guards.

Technical Support Center (TSC)

The Technical Support Center will provide a location to house individuals who are knowledgeable of and responsible for engineering and management support of plant operations following an event. The plant operators and operating staff are responsible for the safe operation of the plant, and for the initial action to minimize the consequences of the event.

The function of the TSC is to serve as a location from which solutions to long term problems are determined in support of the operations staff. Examples of this support are recommendations for system line-up and long term plant assessment. In order to provide this support, plant design/operation information in the form of drawings, FSAR unit Technical Specifications, visual display of parameters (CRT), a line printer for selected plant parameters, and local TSC radiation monitors and alarms, will be available. This information will allow the TSC personnel to assess the status of the plant and stay abreast of the plant parameters.

In addition to the normal plant communications systems, redundant emergency communications facilities in the TSC provide telephone contact with all required agencies and other response centers by use of the emergency communications network. With this information, the TSC staff can provide long term technical advice and support during and after an event. Dissemination of information to the public will occur at the plant Media Center.

The Technical Support Center will be a new pre-engineered metal building situated on a concrete slab, located as shown in Figure 1. The location of the plant security fence is shown on Figure 3.1 of the plant Security Plan. The TSC will be inside that fenced area. The building will be constructed in the area presently used for permanent plant personnel parking. It will be built in accordance with the local building code and is designed to meet the habitability requirements specified in H. R. Denton's letter of October 30, 1979. Dose limits from direct radiation, using the assumptions and calculations described in our December 31, 1979 correspondence for Short Term Lessons Learned Item 2.1.6.b, will allow continuous occupancy once the TSC is activated. A backup facility is not planned and is not deemed necessary.

The following is a description of the Data Acquisition System (DAS) to be employed by CP&L for the H. B. Robinson Plant:

A microprocessor based system will be used to gather data from analog and digital signals. The information will then be multiplexed and transmitted to the TSC for display and trending on a color CRT in either tabular or graphic format and/or written on a printer. A video copier will also be interfaced to the CRT to provide hard copies of graphs and/or any other CRT images desired.

A second color CRT will be located in the plant Control Room to give the plant operators access to the same data. The system will be designed to allow the TSC peripherals and the Control Room CRT to access data simultaneously and independently of each other. The CRT keyboard in the TSC and the Control Room will provide the operator interface with the system.

This system will take most of its inputs from the input bays of the plant computer. Any inputs taken from safety related systems will be properly isolated to ensure safety system integrity. The operation of this system will not adversely affect any plant indications.

The computer system, as configured, is expandable for extra input parameters, off-site data transmission and other foreseeable future requirements.

The TSC computer memory located in the TSC will have independent battery back-up to ensure that stored data is not lost due to loss of power. The data multiplexer located in the plant Computer Room will be powered off a vital bus. The TSC will also have available a small, manual start, diesel generator capable of operating for 24 hours without refueling. This generator will be sized to handle all essential TSC loads.

If for any reason, power in the TSC cannot be re-established in 24 hours, or refueling of the generator has not occurred, sufficient time will have elapsed to allow alternate methods of providing the needed technical support.

The On-Site Technical Support Center will be staffed by the Plant General Manager and by on-site personnel. The plant Emergency Plan designates the following personnel to staff the TSC:

Manager	-	Technical & Administrative
Supervisor	-	Operations & Maintenance, Unit 1
Supervisor	-	Administrative
Supervisor	-	Maintenance
Supervisor	-	Engineering
Supervisor	-	Quality Assurance
Supervisor	-	Environmental and Radiation Control
Supervisor	-	Training
Others	-	As Required

Emergency Operations Facility

The functions of the Emergency Operations Facility, as described in D. G. Eisenhower's letter of April 25, 1980, are:

1. Overall management of utility resources.
2. Analyses of plant effluents.
3. Off-site monitoring for off-site action decisions.
4. Briefing location for off-site officials and media representatives.

CP&L will provide the above functions with redundant coverage by the interaction of the Recovery Center, Plant Media Center, and Local Emergency Operations Center (LEOC). These three centers will be connected with a comprehensive, redundant communications network which

allows personnel located in the centers to act in concert to perform all functions as if they were housed together, while retaining the ability to relocate from any one of the three should it become uninhabitable.

In addition to the normal communications systems, the emergency system will tie the three centers together and provide access to all required locations. Telephone circuits and radio nets will provide redundant, flexible communications for the centers.

Recovery Center

The Recovery Center at Robinson is located in the existing plant Administration Building. The capability to expand into mobile facilities has been planned and exists if required. The Administration Building is of cinder block construction and the mobile facilities are steel. The need for a comprehensive backup facility is under investigation and one will be provided if deemed necessary.

The Recovery Center will be managed by the Vice President, Nuclear Operations. The Recovery Organization is staffed to provide support in:

Plant Operations

Construction

Technical Support

Administration and Logistics

Engineering

Radiological Control and Waste

Each of these support functions is directed by an experienced manager who reports to the Recovery Manager.

Plant Media Center

The existing visitors center at Robinson has been designated as the plant Media Center. In addition to normal communications, the center will be tied into the emergency network. Work stations are available for Company personnel assisting the media and a briefing room is available. Provisions have been made for the Bell system to provide separate telephones for use by the media representatives. All of these facilities are in addition to the briefing rooms and other media facilities provided at the LEOC. Construction of the center is permanent type masonry and siding.

The plant Media Center is staffed by the Site Public Information Coordinator and Corporate Public Information personnel. The facility is designed to facilitate use by Corporate, State and Federal spokesmen.

Local Emergency Operations Center (LEOC)

The Robinson plant has a local emergency operations center located nearby. This center is provided by local governmental agencies. The facility, which is tied into our Company emergency communications nets, provides Local, State and Federal authorities a location from which they

can direct off-site activities. In addition, briefing rooms and work areas are available which can support media personnel. Dedicated telephone circuits and radio communications will connect the LEOC with the plant. The LEOC supporting Robinson is in the South Carolina National Guard Armory in Hartsville, South Carolina, about five miles from the plant. This building is of brick construction. This center is primarily staffed by Local, State and Federal authorities; however, CP&L provides liaison personnel to them.

On-Site Operational Support Center

The function of this center is to provide an area for assembly and briefing of off-shift and other unassigned personnel. This center is tied into the emergency communications network in addition to its normal communications capability. The location is in the existing Maintenance Shop at Robinson.

Corporate Emergency Operations Center (CEOC)

The function of this center is to provide personnel, facilities, communications and equipment to support the affected plant, coordinate with outside agencies and provide interface with Corporate Management. This center, to be located in the Corporate headquarters in Raleigh, North Carolina, will be staffed and equipped to perform the functions stated above. It will be tied into the emergency communications network and is managed by the Vice President - Power Supply.

The CEOC, in addition to the Manager, will be staffed by communications personnel, clerical personnel, and other support personnel.

Corporate Headquarters Media Center

The functions of this center are to assimilate all information flowing from the plant and Corporate Management which is to be distributed to the news media; to support the plant media center and distribute background information; and to make information available directly to the news media as well as distributing it through the plant media centers. It will be tied into the emergency network. Adequate space, equipment, and personnel will be provided to accomplish the functions listed above.

Other Headquarters/Centers

State Emergency Operations Centers

Location: Columbia, South Carolina

This center is established by the Governor of South Carolina and is staffed to support State and Local activities. Carolina Power & Light Company provides representatives from Corporate Communications and Nuclear Operations to the center. Bell and State communications equipment is provided.

NRC Headquarters

Coordinates through local NRC representatives. May provide supporting personnel who will work out of the Recovery Center and/or LEOC.

Federal Emergency Management Agency

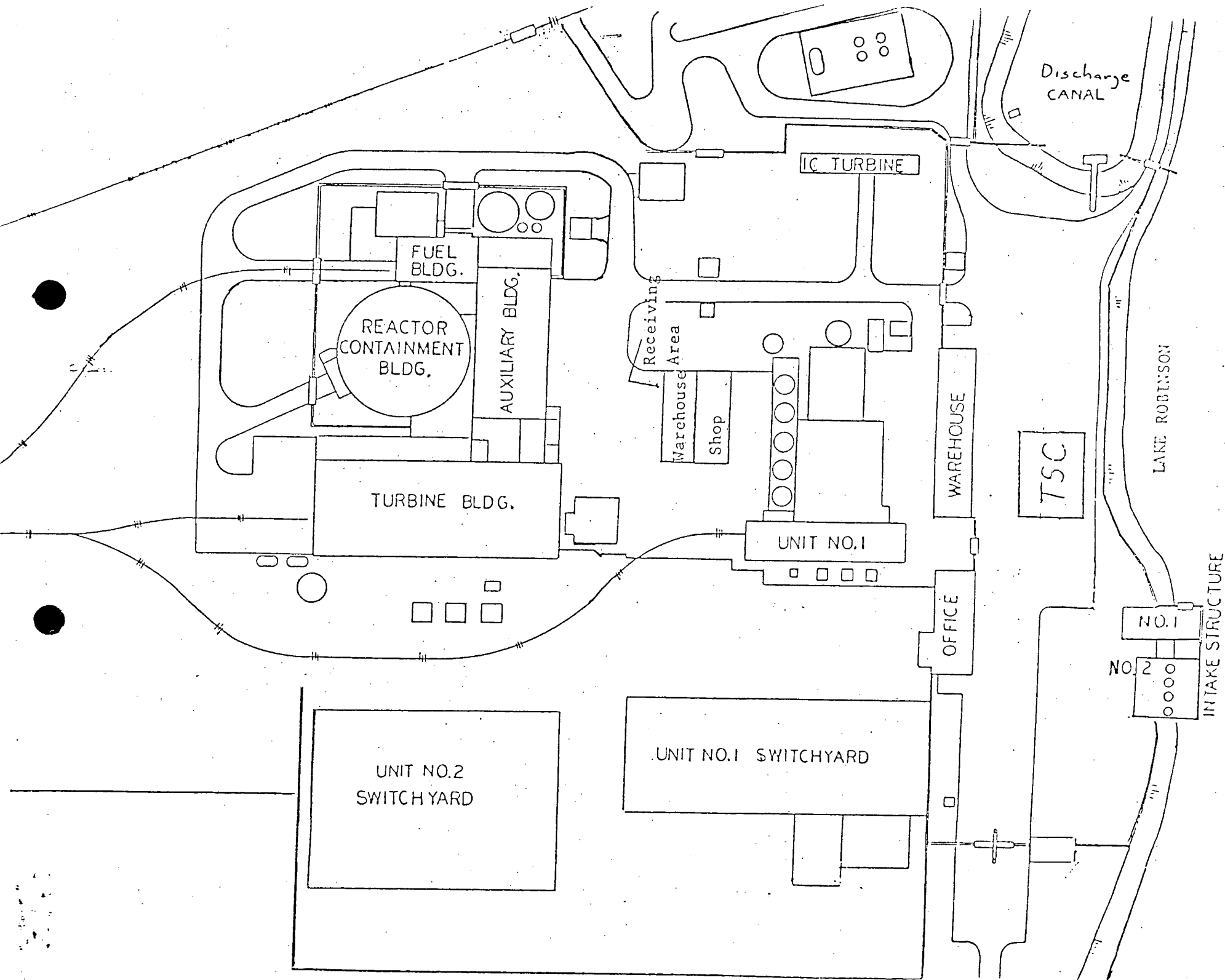
May send representatives who will work out of the LEOC.

Architect/Engineer

Via dedicated line communications to On-Site Technical Support Center, Recovery Center, and control room. May send representatives who will work in the On-Site Technical Support Center and/or the Recovery Center.

Nuclear Steam Supply System Vendor

Via dedicated line communications to Plant Media Center, On-Site Technical Support Center and control room. May send representatives who will work in the On-Site Technical Support Center and/or the Recovery Center.



Location of
Robinson TSC