

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 245 PEACHTREE CENTER AVENUE NE, SUITE 1200 ATLANTA, GEORGIA 30303-1257

September 2, 2014

Mr. William R. Gideon Site Vice President Duke Energy Progress, Inc. H. B. Robinson Steam Electric Plant Unit 2 3581 West Entrance Road Hartsville, South Carolina 29550

## SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR H.B. ROBINSON STEAM ELECTRIC PLANT – NRC INSPECTION REPORT 05000261/2014006

Dear Mr. Gideon:

On August 13, 2014, the Nuclear Regulatory Commission (NRC) completed its mid-cycle performance review of H.B. Robinson Steam Electric Plant. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2013, through June 30, 2014. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that overall, H.B. Robinson Steam Electric Plant operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at H.B. Robinson Steam Electric Plant, during the most recent quarter, was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

During the fourth quarter of 2013, H.B. Robinson Steam Electric Plant was within the Regulatory Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because of one inspection finding classified as low to moderate safety significance (white) in the Mitigating Systems Cornerstone and all PIs indicated that your performance was within the nominal, expected range (i.e., green). The White finding involved the failure to perform adequate preventive maintenance on the dedicated shutdown diesel generator cooling system. The NRC assigned a White Action Matrix input to the Mitigating Systems cornerstone in the second Quarter of 2013 based upon the exit meeting date of May 22, 2013. The White Action Matrix input was later revised to start in the first quarter of 2013, after further review, and in consideration that the onsite inspection activity was completed on March 30, 2013.

On December 19, 2013, the NRC completed the supplemental inspection in accordance with Inspection Procedure 95001 and documented the results in our letter to you dated January 31, 2014 (ADAMS Accession No. ML14031A464). The White finding was not considered in the Action Matrix after the end of the fourth quarter of 2013, and H. B. Robinson Steam Electric Plant returned to the Licensee Response Column of the ROP Action Matrix as of January 1, 2014.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 reflect this revision to Inspection Manual Chapter (IMC) 0310. Cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310 during the mid-cycle assessment review and evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security-related inspections, which will be sent via separate, non-publicly available correspondence.

We also plan on conducting the following infrequently performed inspections and temporary instructions: Operator Licensing Exams; and TI 2515/190, Near Term Task Force Recommendation 2.1, Flooding.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the first unit at each site, and will aid staff in development of an ultimate Safety Evaluation for the site. The date for the onsite component at your site is scheduled for March 2, 2015. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at http://www.nrc.gov/readingrm/adams.html (the Public Electronic Reading Room).

Please contact me at 404-997-4645 with any questions you may have regarding this letter.

Sincerely,

### /RA/

George T. Hopper, Chief Reactor Projects Branch 4 Division of Reactor Projects

Docket Nos.: 50-261 License Nos.: DPR-23

Enclosure: Robinson Inspection/Activity Plan (09/01/2014 – 12/31/2015)

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YES

NO

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YES

ADAMS: Xes ACCESSION NUMBER: SUNSI REVIEW COMPLETE SFORM 665 ATTACHED OFFICE DRP: RIL DRP: RII DRP: RII SIGNATURE DXW /RA/ JSD /RA/ GTH /RA/ NAME DJackson JDodson GHopper DATE 8/20/2014 8/25/2014 8/27/2014

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NO

YES

NO

YES

NO

YES

NO

Letter to William R. Gideon from George T. Hopper dated September 2, 2014.

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# Robinson Inspection / Activity Plan 09/01/2014 - 12/31/2015

Unit Number	Planne Start	d Dates End	Inspection A	ctivity	No. of Staff on Site
		-	TFPI	- TRIENNIEL FIRE PROTECTION INSP	7
2	10/20/2014	10/24/2014	IP 7111105T	Fire Protection [Triennial]	1
2	11/03/2014	11/07/2014	IP 7111105T	Fire Protection [Triennial]	
2	11/00/2014	11/01/2014	OL RQ	- REQUAL INSP	2
2	03/02/2015	03/06/2015	IP 7111111B	Licensed Operator Regualification Program	-
2	00/02/2010	00/00/2010	RP	- RP OCCUPATIONAL BASELINE WEEK 1	2
2	05/11/2015	05/15/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	-
2	05/11/2015	05/15/2015	IP 71124.02	Occupational ALARA Planning and Controls	
2	05/11/2015	05/15/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
2	05/11/2015	05/15/2015	IP 71124.04	Occupational Dose Assessment	
2	05/11/2015	05/15/2015	IP 71124.05	Radiation Monitoring Instrumentation	
2	05/11/2015	05/15/2015	IP 71151	Performance Indicator Verification	
			ISI	- UNIT 2 IN-SERVICE INSPECTION & RVH EXAM	2
2	05/18/2015	05/22/2015	IP 7111108P	Inservice Inspection Activities - PWR	
			RP	- RP OCCUPATIONAL BASELINE WEEK 2	3
2	06/01/2015	06/05/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
2	06/01/2015	06/05/2015	IP 71124.02	Occupational ALARA Planning and Controls	
2	06/01/2015	06/05/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
2	06/01/2015	06/05/2015	IP 71124.04	Occupational Dose Assessment	
2	06/01/2015	06/05/2015	IP 71124.05	Radiation Monitoring Instrumentation	
2	06/01/2015	06/05/2015	IP 71151	Performance Indicator Verification	
			HS	- TRIENNIAL HEAT SINK PERFORMANCE	1
2	07/06/2015	07/10/2015	IP 7111107T	Heat Sink Performance	
			EP	- EP EXERCISE	5
2	07/20/2015	07/24/2015	IP 7111404	Emergency Action Level and Emergency Plan Changes	
2	07/20/2015	07/24/2015	IP 7111407	Exercise Evaluation - Hostile Action (HA) Event	
2	07/20/2015	07/24/2015	IP 71151	Performance Indicator Verification	
			MODS	- PLANT MODIFICATION INSPECTION	5
2	10/26/2015	10/30/2015	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
2	11/16/2015	11/20/2015	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	