



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

SEP 24 1984

Report No.: 50-261/84-29

Licensee: Carolina Power and Light Company
411 Fayetteville Street
Raleigh, NC 27602

Docket No.: 50-261

License No.: DPR-23

Facility Name: H. B. Robinson

Inspection Conducted: August 21-23, 1984

Inspector: T. R. Decker
T. R. Decker

9/18/84
Date Signed

Accompanying Personnel: P. Brown
G. Martin
M. Blauer
G. Endres

Approved by: W. E. Cline
for W. E. Cline, Section Chief
Emergency Preparedness Section

9/21/84
Date Signed

SUMMARY

Scope: This routine unannounced inspection involved 125 inspector-hours on site in the area of an emergency exercise.

Results: Of the areas inspected no violations or deviations were identified.

REPORT DETAILS

1. Licensee Employees Contacted

- *J. Elleman, Corporate Spokesman
- *R. Black, Director Emergency Preparedness
- *C. Crawford, Acting Plant General Manager
- *A. Zimmerman, Director-Planning and Scheduling
- *H. Young, Director, QA/QC
- *C. Wright, Senior Specialist Regulatory Compliance
- *H. Banks, Manager, Corporate QA
- *F. Lowery, Operations Supervisor
- *S. Crocker, Principal Specialist Radiation Control
- *J. Sheppard, Manager Planning and Scheduling
- *F. Gilman, Project Specialist-Regulatory Compliance
- *M. Morrow, Specialist-Emergency Preparedness

Other licensee employees contacted included technicians, operators, mechanics, security force members and office personnel.

NRC Resident Inspector

*H. Krug

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on August 23, 1984, with those persons indicated in paragraph 1 above.

3. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. One new unresolved item identified during this inspection is discussed in paragraph 10.

4. Exercise Scenario (82301)

The scenario for the emergency exercise was reviewed to determine that provisions had been made to test the integrated capability and a major portion of the basic elements existing within the licensee's emergency plan and organization as required by 10 CFR 50.47(b)(14), 10 CFR 50, Appendix E, paragraph IV.F and specific criteria in NUREG-0654, Section II.N.

The scenario was reviewed in advance of the scheduled exercise date and was discussed with licensee representatives. The scenario developed for this exercise was adequate to fully exercise the onsite emergency organizations

of the licensee and provided sufficient emergency information to the state and local government agencies for their limited participation in the exercise. The inspector had no further questions in this area.

No violations or deviations were identified.

5. Assignment of Responsibility (82301)

This area was observed to determine that primary responsibilities for emergency response by the licensee have been specifically established and that adequate staff is available to respond to an emergency as required by 10 CFR 50.47.(b)(1), 10 CFR 50, Appendix E, paragraph IV.A, and specific criteria in NUREG-0654, Section II.A.

The inspectors verified that the licensee has made specific assignments to the emergency organization. The inspectors observed the activation, staffing and operation of the emergency organization in the Control Room, TSC, OSC, and EOF. At each of these centers, the assignment of responsibility and staffing appeared to be consistent with the licensee's approved procedures. The inspectors had no further questions in this area.

No violations or deviations were identified.

6. Onsite Emergency Organization (82301)

The licensee's onsite emergency organization was observed to determine that the responsibilities for emergency response were unambiguously defined, that adequate staffing was provided to insure initial facility accident response in key functional areas at all times, and that the interfaces were specified as required by 10 CFR 50.47(b)(2), 10 CFR 50, Appendix E, paragraph IV.A, and specific criteria in NUREG-0654, Section II.B.

The inspectors determined that the licensee's onsite emergency organization was effective in dealing with the simulated emergency. Adequate staffing of the emergency response facilities was provided for the initial accident response and the interfaces between the onsite organization and offsite support agencies appeared to be adequate. The inspectors had no further questions in this area.

No violations or deviations were identified.

7. Emergency Response Support and Resources (82301)

This area was observed to determine that arrangements for requesting and effectively using assistance resources have been made and that other organizations capable of augmenting the planned response have been identified as required by 10 CFR 50.47(b)(3), 10 CFR 50, Appendix E, paragraph IV.A, and specific criteria for NUREG-0654, Section II.C.

Due to the small scale nature of the exercise, licensee interaction with State and local agencies was limited to alerting, notifying and reporting as per procedure. With the exception of certain notifications from the control room (see paragraph 10), licensee contact with offsite agencies was generally prompt. The inspector had no further questions in this area.

No violations or deviations were identified.

8. Emergency Classification System (82301)

This area was observed to determine that a standard emergency classification and action level scheme is in use by the nuclear facility licensee as required by 10 CFR 50.47(b)(4), 10 CFR 50, Appendix E, paragraph IV.C, and specific criteria in NUREG-0654, Section II.D.

An emergency action level scheme was used to promptly identify and properly classify the emergency and escalate to more severe emergency classes as the simulated emergency progressed. Licensee actions in this area were considered adequate and the inspector had no further questions.

No violations or deviations were identified.

9. Notification Methods and Procedures (82301)

This area was observed to determine that procedures have been established for notification by the licensee of State and local response organizations and emergency personnel, and that the content of initial and followup messages to response organizations has been established; and means to provide early notification to the populace within the plume exposure pathway have been established as required by 10 CFR 50.47(b)(5), 10 CFR 50, Appendix E, paragraph IV.D, and specific criteria in NUREG-0654, Section II.E.

An inspector observed that notification methods and procedures have been established and were used to provide information concerning the simulated emergency conditions to Federal, State and local response organizations and to alert the licensee's augmented emergency response organization. The inspectors had no further questions in this area.

No violations or deviations were identified.

10. Emergency Communications (82301)

This area was observed to determine that provisions exist for prompt communication among principal response organizations and emergency personnel as required by 10 CFR 50.47(b)(6), 10 CFR 50, Appendix E, paragraph IV.E, and specific criteria in NUREG-0654, Section II.F.

Use of communication systems among the licensee's emergency response facilities and emergency organization and between the licensee's emergency response organization and offsite authorities were observed. During offsite notifications by the control room staff, it was observed that the communicator had difficulty placing the telephone call to the offsite authorities. This was due to the fact that all telephone circuits were busy. During this time, no attempt was made to use the backup system. The inspector was informed that there was no ring down or other dedicated line available in the control room for making notifications to offsite authorities. The inspector stated that 10 CFR 50.47(b)(6) requires that the licensee have provisions for prompt communication with principal emergency response agencies. Although notification/communication systems in the control room are only part of the total notification/communication system, this portion of the system appears weak based on exercise observations. This will be considered an unresolved item and the entire area of offsite notification will be reviewed in a future inspection (50-261/84-29-01).

No violations or deviations were identified.

11. Public Education and Information (82301)

This area was observed to determine that information concerning the simulated emergency was made available for dissemination to the public as required by 10 CFR 50.47(b)(7), 10 CFR 50, Appendix E, paragraph IV.D, and specific criteria in NUREG-0654, Section II.G.

An Emergency News Center (ENC) was established and was well equipped and coordinated. Periodic news releases were issued. A rumor control program was in place and was exercised. A corporate spokesman was designated and provided press briefings.

No violations or deviations were identified.

12. Emergency Facilities and Equipment (82301)

This area was observed to determine that adequate facilities and equipment to support an emergency response have been provided and maintained as required by 10 CFR 50.47(b)(8), 10 CFR 50, Appendix E, paragraph IV.E, and specific criteria in NUREG-0654, Section II.H.

The inspectors observed the activation, staffing and operation of the emergency response facilities and evaluated equipment provided for emergency use during the exercise.

- a. Control Room - An inspector observed that control room personnel acted promptly to initiate emergency response to the simulated emergency. Emergency procedures were readily available and used effectively in the response effort. The inspector had no further questions in this area.

- b. Technical Support Center (TSC) - The TSC was activated and staffed promptly upon notification by the Emergency Coordinator of the simulated emergency conditions leading to an Alert emergency classification. The TSC staff appeared to be knowledgeable concerning their emergency responsibilities and TSC operations proceeded smoothly. The TSC appeared to have adequate equipment for the support of the assigned staff. The inspectors had no further questions in this area.
- c. Operations Support Center (OSC) - The OSC was staffed promptly upon activation by the Emergency Coordinator. An inspector observed that teams were organized, briefed, and dispatched promptly. The inspector had no further questions in this area.
- d. Emergency Operations Facility - The interim EOF appears to be cramped for space but was adequately equipped and staffed to support an emergency response.
- e. The interim TSC and EOF were used for the last time during this exercise. The licensee intends to have their new hardened facility available for the 1985 exercise. The inspector had no further questions in this area.

No violations or deviations were identified.

13. Accident Assessment (82301)

This area was observed to determine that adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition were in use as required by 10 CFR 50.47(b)(9), 10 CFR 50, Appendix E, paragraph IV.B, and specific criteria in NUREG-0654, Section II.I.

The accident assessment program included both an engineering assessment of plant status and an assessment of radiological hazards to both onsite and offsite personnel resulting from the accident. During the exercise, the engineering accident assessment team functioned adequately in analyzing the plant status so as to make recommendations to the Site Emergency Manager concerning mitigating actions to reduce damage to plant equipment, to prevent release of radioactive materials and to terminate the emergency condition.

Radiological assessment activities began with the TSC and transferred to the EOF as described in procedures. The dose assessment procedure used in both the TSC and EOF incorporated detailed meteorological parameters which were available from the onsite meteorological instruments. Default values were available for use should there be any question concerning the reliability of the meteorological instrumentation. The inspector had no further questions in this area.

No violations or deviations were identified.

14. Protective Responses (82301)

This area was observed to determine that guidelines for protective actions during the emergency, consistent with Federal guidance, have been developed and are in place, and protective actions for emergency workers, including evacuation of nonessential personnel, are implemented promptly as required by 10 CFR 50.47(b)(10), and specific criteria in NUREG-0654, Section II.J.

An inspector verified that the licensee had and used appropriate emergency procedures for formulating protective action recommendations for offsite populations within the 10 mile EPZ. The licensee's protective action recommendations were consistent with the federal guidance.

An inspector observed that protective actions were instituted for on-site emergency workers which included periodic radiation surveys in the facility, evacuation of nonessential personnel, and continued accountability of emergency response personnel. The inspector had no further questions in this area.

The inspector noted that twice during the simulated emergency, false site evacuation alarms were vocally simulated on the public address system. During the exit interview, the inspector commented on the poor discipline on the public address system and pointed out the negative results that could occur during an exercise or real emergency. The licensee had previously identified poor public address discipline during his critique and the inspector had no further questions.

No violations or deviations were identified.

15. Radiological Exposure Control (82301)

This area was observed to determine that means for controlling radiological exposures in an emergency have been established and implemented for emergency workers and that they include exposure guidelines consistent with EPA recommendations as required by 10 CFR 50.47(b)(11), and specific criteria for NUREG-0654, Section II.K.

An inspector noted that radiological exposures were monitored throughout the exercise by issuing emergency workers supplemental dosimeters and by periodic surveys in the plant and in the emergency response facilities. Exposure guidelines were in place for various categories of emergency actions and adequate protective clothing and respiratory protection was available and used as appropriate. The inspector had no further questions in this area.

No violations or deviations were identified.

16. Medical and Public Health Support (82301)

This area was observed to determine that arrangements have been made for medical services for contaminated injured individuals as required by

10 CFR 50.47(b)(12), 10 CFR 50, Appendix E, paragraph IV.E, and specific criteria in NUREG-0654, Section II.L.

An inspector observed the emergency medical rescue activities at the accident scene, transport of the victim from the scene to the Byerly Hospital and treatment by the staff at the hospital. In all portions of this exercise activity, appropriate knowledge and judgement was displayed with regard to first aid methods, decontamination of the patient, and contamination control. The inspector had no further questions in this area.

No violations or deviations were identified.

17. Recovery and Reentry Planning (82301)

This area was observed to determine that general plans have been made for recovery and re-entry as required by 10 CFR 50.47(b)(13), 10 CFR 50, Appendix E, paragraph IV.H. and specific criteria in NUREG-0654, Section II.M.

During the recovery/reentry phase of the exercise, the inspector noted that the licensee developed general plans and procedures for re-entry and recovery which addressed both existing and potential conditions.

No violations or deviations were identified.

18. Exercise Critique (82301)

The licensee's critique of the emergency exercise was observed to determine that deficiencies identified as a result of the exercise and weaknesses noted in the licensee's emergency response organization were formally presented to licensee management for corrective actions as required by 10 CFR 50.47(b)(14), 10 CFR 50, Appendix E, paragraph IV.E, and specific criteria in NUREG-0654, Section II.N.

A formal licensee critique of the emergency exercise was held with key exercise participants, licensee management and NRC personnel attending. Deficiencies and weaknesses in the emergency preparedness program, identified as a result of this exercise, were presented. The licensee discussed followup actions to be taken on problems identified. Followup of corrective actions taken by the licensee identified deficiencies and weaknesses will be reviewed during subsequent NRC inspections.

19. Inspector Followup (92701)

- a. (Closed) Inspector Followup Item (IFI) 83-31-01: Improve utilization of shift technical advisor (STA). The STA was observed performing technical assessment work during the exercise and was properly used.
- b. (Closed) IFI 83-31-03: TSC should drive evaluation of mitigating action options. The TSC staff was effective in considering and proposing mitigating actions during the exercise.

- c. (Closed) IFI 83-31-05: Follow approved dose assessment procedures. The licensee's TSC and EDF staff was observed using and following proper dose assessment procedures during the exercise.