



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

SEP 12 1984

Report No.: 50-261/84-28

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, Unit 2

Inspection Dates: July 30 - August 3, 1984

Inspection at H. B. Robinson site near Hartsville, South Carolina

Inspector: J. L. Kreh 9-7-84
 J. L. Kreh Date Signed

Approved by: W. E. Cline 9-7-84
 W. E. Cline, Section Chief Date Signed
 Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine, unannounced inspection involved 31 inspector-hours onsite in the area of emergency preparedness.

Results: No violations or deviations were identified.

8411160031 840912
 PDR ADCK 05000261
 Q PDR

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- R. E. Morgan, Plant General Manager
- *J. M. Curley, Manager, Technical Support (Acting Plant General Manager)
- *G. P. Beatty, Manager, Robinson Nuclear Project
- *H. J. Young, Director, Corporate QA/QC
- *B. G. Rieck, Manager, Control and Administration
- *D. S. Crocker, Manager, Environmental and Radiation Control
- *R. M. Smith, Manager, Environmental and Radiation Control
- *J. R. Sipp, Manager, Environmental and Radiation Control (Shearon Harris)
- *J. L. Buckingham, Shift Technical Advisor, Operations
- *C. L. Wright, Senior Specialist, Regulatory Compliance
- *F. Gilman, Project Specialist, Regulatory Compliance
- E. A. Lee, Shift Foreman
- D. W. McCaskill, Shift Foreman
- R. O. Moore, Shift Foreman
- S. R. Barrett, Senior Specialist, QA
- B. H. Snipes, Senior Specialist, Nonlicense Training and Administration
- *M. C. Morrow, Specialist, Emergency Preparedness

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on August 3, 1984, with those persons indicated in paragraph 1 above.

3. Licensee Action on Previous Enforcement Matters

(Closed) Violation (50-261/83-35-01): Failure to have capability to determine appropriate offsite protective action recommendations based solely on core and containment status. Corrective action was verified by procedure review and by walk-throughs with Shift Foremen (details, paragraph 4.)

4. Emergency Detection and Classification (82201)

This program area was inspected to determine that the licensee has and understands a standard emergency classification and action level scheme.

The inspector reviewed the licensee's classification procedures. The event classifications were consistent with those required by 10 CFR 50, Appendix E, Part IV.C. The classification procedures did not appear to contain impediments or errors which could lead to incorrect or untimely classification.

Selected emergency action levels (EALs) specified in the licensee's classification procedures were reviewed. The EALs reviewed appeared to be consistent with the initiating events specified in Appendix 1 of NUREG-0654.

The inspector noted that some of the EALs were based on parameters obtainable from Control Room instrumentation.

The inspector verified by review of applicable Plant Emergency Procedures (PEPs) that initial offsite notifications were a requirement for each emergency classification.

The inspector discussed coordination of EALs among State and local officials with a licensee representative who stated that the EALs were reviewed and discussed with appropriate State and local officials during several meetings in March-April 1984. Except for a record of the dates, no documentation of these meetings existed. Since an annual review of EALs with State and local governmental authorities is a requirement of 10 CFR 50, Appendix E, Part IV.B, the licensee agreed to document activities in this area.

Inspector Follow-up Item (261/84-28-01): Documentation of annual review of EALs with offsite agencies.

Interviews were held with three Shift Foremen to verify that they understood the relationship between core status and such core damage indicators as containment dome monitor, high-range effluent monitor, and postaccident primary coolant analysis. All three Shift Foremen appeared knowledgeable in this area.

The responsibility and authority for classification of emergency events and initiation of emergency action are prescribed in the PEPs and in the Radiological Emergency Plan (REP). Interviews with Shift Foremen revealed that these personnel understood their responsibilities and authorities in relation to accident classification, notification, and protective action recommendations.

Selected Emergency Operating Procedures (EOPs) were reviewed and discussed with licensee personnel. The EOPs did not provide direction to users concerning timely classification of accidents. Licensee representatives informed the inspector that a wholesale revision of the EOPs is in progress and is due for completion prior to restart (scheduled for late October 1984) after the current outage for steam generator replacement. The revised EOPs will be evaluated during a future inspection.

Inspector Follow-up Item (261/84-28-02): Directing the EOP user to the PEPs to insure that an emergency will be classified in a timely manner.

Walk-through evaluations involving accident classification problems were conducted with three Shift Foremen. Except as noted below, all of them promptly and properly classified the scenarios and appeared to be familiar with appropriate classification procedures. One of the scenarios involved loss of physical control of the facility to armed intruders. Using PEP-101 ("Initial Emergency Actions"), each of the interviewees classified the situation as a Site Emergency (although two of the three stated that, in their judgment, it should have been a General Emergency). Based on the initiating conditions of NUREG-0654, Appendix 1, the scenario should have been classified as a General Emergency, with an associated protective action recommendation (viz., precautionary 2-mile evacuation). The licensee was

aware of this procedural inadequacy as a result of identification of a similar problem by the corporate evaluation of the May 1984 exercise at the Brunswick plant. The inspector advised licensee representatives that NRC considered this matter a licensee-identified violation of 10 CFR 50.47(b)(4) and (10). During the exit meeting, the licensee committed to take corrective action by October 1, 1984.

Inspector Follow-up Item (261/84-28-03): Proper classification and protective action recommendation for an event involving loss of physical control of the plant to intruders.

No violations or deviations were identified in this program area.

5. Notification and Communications (82203)

This area was reviewed to determine whether the licensee is maintaining a capability for notifying and communicating with plant personnel, offsite support agencies and authorities, and the population within the EPZ in the event of an emergency.

The licensee's notification procedures were reviewed by the inspector. The procedures were consistent with the emergency classification and EAL scheme used by the licensee. The inspector determined that the procedures made provisions for message verification.

The inspector determined by review of PEP-204 ("Notification of Off-Duty Personnel") and PEP-205 ("Mobilization of Outside Organizations and Personnel") and by discussion with licensee representatives that adequate procedural means existed for alerting, notifying, and activating emergency response personnel. The procedures specified when to notify and activate the onsite emergency organization, corporate support organization, and offsite agencies. Selected home telephone numbers listed in the licensee's procedures for notifying emergency response organizations were checked in order to determine whether the listed numbers were current and correct. No problems were noted.

The content of initial emergency messages was reviewed and discussed with licensee representatives. The initial messages appeared to meet the guidance of NUREG-0654, Sections II.E.3 and II.E.4. Licensee representatives stated that the format and content of the initial emergency messages have been standardized for use by all nuclear facilities in North Carolina and South Carolina. The inspector noted that the warning message contained blanks for filling in "zone" designators for those areas to be sheltered or evacuated. PEP-105 ("Emergency Control - General Emergency") did not mention "zones", but instead conventionally defined areas subject to protective action recommendations in terms of radial and downwind distances in miles. The licensee acknowledged the inspector's comment on this matter and agreed to upgrade the procedure accordingly.

Inspector Follow-up Item (261/84-28-04): Procedural mechanism to "translate" areas subject to protective action recommendations into the "zones" called for in the standard warning message.

The licensee management control program for the prompt notification system was reviewed. According to a licensee representative, the system consisted of 45 fixed sirens in the 10-mile EPZ (28 sirens in Darlington County, 13 in Chesterfield County, and 4 in Lee County). Maintenance of the siren system was accomplished by the licensee. The inspector verified that siren test records were on file to document that silent tests were conducted every two weeks, growl tests quarterly, and complete cycle tests annually, as specified in NUREG-0654, Appendix 3.

Communications equipment in the Control Room, TSC, and EOF was inspected. Provisions existed for prompt communications among emergency response organizations, to emergency response personnel, and to the public. The installed communications systems at the emergency response facilities were consistent with system descriptions in the PEPs and the REP.

The inspector conducted operability checks on selected communications equipment in the Control Room and TSC. No problems were observed. Selected records of communications tests during the past year were reviewed. The inspector noted from the records that communications tests were conducted at the frequencies specified in NUREG-0654, Section II.N.2.a. Licensee records also revealed that corrective action was taken on problems identified during communications tests.

Redundancy of offsite and onsite communications links was discussed with licensee representatives. The inspector verified that the licensee has established backup communications systems. The primary and backup communications links were discussed in REP Appendix A and delineated in Exhibit 2 of PEP-202 ("Communications Activities"). These communications links will be observed in operation during the upcoming exercise.

No violations or deviations were identified in this program area.

6. Changes to the Emergency Preparedness Program (82204)

This area was reviewed to determine if changes had been made to the program since the last inspection and to note how these changes affect the overall state of emergency preparedness.

The inspector discussed the licensee's program for making changes to the emergency plan and implementing procedures. The inspector verified that changes to the REP and PEPs were reviewed and approved by management. All changes to the REP and PEPs were submitted to NRC within 30 days of such changes, as required by 10 CFR 50.54(q) and 10 CFR 50, Appendix E, Part V.

Discussions were held with licensee representatives concerning recent modifications to facilities, equipment, and instrumentation. The Post-Accident Sampling System (PASS) had been previously inspected by NRC. However, PASS capabilities have not been factored into the REP, and PEP-253 ("Collection of Radioactive Samples") referenced the wrong Chemistry procedures for use of the PASS. The licensee agreed to make the changes necessary to rectify these problems. The new, hardened, onsite structure housing the TSC and EOF was nearly complete, with final turnover anticipated by about November 1. Descriptions and capabilities of these new facilities

had not yet been factored into the REP and the PEPs. These facilities will be evaluated in detail at a later date.

The organization and management of the emergency preparedness program were reviewed. The position of Emergency Preparedness Specialist was reassigned to a different individual as of October 1, 1983. This individual has attended three well-known emergency preparedness courses, and has received CP&L management training as well.

Major changes to the emergency response organization included the assignment of the Manager, Robinson Nuclear Project, as the primary Emergency Response Manager (stationed at the EOF) and the Plant General Manager as primary Site Emergency Coordinator (at the TSC). Discussions with licensee representatives indicated that these individuals had received all required training for these positions before being assigned.

The inspector reviewed the licensee's program for distribution of changes to the REP and the PEPs. Document control records for the period July 1983 to July 1984 indicated that appropriate personnel and organizations were sent copies of changes as required by 10 CFR 50.47(b)(16).

No violations or deviations were identified in this program area.

7. Shift Staffing and Augmentation (82205)

This area was inspected to determine that shift staffing for emergencies is adequate in numbers and in functional capability, and that administrative and physical means are available and maintained to augment the emergency organization in a timely manner.

Shift staffing levels and functional capabilities of all shifts were reviewed and found to be consistent with the guidance of Table B-1 of NUREG-0654. The licensee has established a duty-officer system using radio pagers so that essential off-shift personnel are available if needed. The licensee's off-shift call-in procedure appeared to be effective in meeting Table B-1 goals with respect to staffing levels.

The inspector discussed staff augmentation times with licensee representatives, who indicated that past drills revealed that the Table B-1 augmentation times could be met. However, the last augmentation drill was conducted on 6/5/83, and the inspector determined that the licensee had no plans for conducting further evaluations of staff augmentation times through drills, studies or testing during the annual exercise. This appeared to be an oversight related to the change of personnel in the position of site Emergency Preparedness Specialist (see paragraph 6), and the licensee agreed to take corrective action.

Inspector Follow-up Item (261/84-28-05): Periodic drill or study to verify Table B-1 augmentation times.

No violations or deviations were identified in this program area.

8. Licensee Audits (82210)

This area was inspected to determine that the licensee has performed an independent review or audit of the emergency preparedness program.

Records of audits of the program pursuant to 10 CFR 50.54(t) were reviewed. The records showed that an independent audit was conducted by the Corporate Quality Assurance Department on September 26-30, 1983, with the results documented in Report No. QAA/20-37. This audit met the 12-month frequency requirement for such audits. Audit findings and recommendations were presented to plant and corporate management. The audit records showed that the State and local government interface was evaluated. However, the inspector noted that the auditor's checklist was lacking in specificity with respect to this interface. The inspector discussed with licensee representatives the need to clearly delineate the elements to be evaluated in the determination of adequacy of the interfaces with State and local support organizations. The licensee agreed to refer this matter to the corporate office for evaluation.

Inspector Follow-up Item (261/84-28-06): Expanding the scope of the audit of the interface with State and local support agencies.

The licensee's program for follow-up action on audit and exercise findings was reviewed. Licensee procedures required follow-up on deficient areas identified during audits and exercises. The inspector reviewed selected records which indicated that appropriate corrective action was taken on identified problems. The licensee has established a Facility Automated Commitment Tracking Systems (FACTS) as a management tool in following up on actions taken on deficient areas.

No violations or deviations were identified in this program area.

9. Inspector Follow-up (92701)

- a. (Closed) Inspector Follow-up Item (IFI) 261/83-31-02: Notification procedures should require notification of NRC Resident Inspector. This change was entered into Revision 2 of PEP-102, -103, -104, and -105.
- b. (Closed) IFI 261/83-35-02: Review procedures for incorporating REP/PEP changes into lesson plans to assure that the training program reflects the current status of the REP and PEPs. The inspector's review of Training Instruction 303 ("Dissemination of Information") verified the licensee's claim that it provided for a more thorough review process on revisions. Responsibilities for implementation of this review program were assigned to appropriate personnel.