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**CP&L**

Carolina Power & Light Company 6 OCT 20 P 1:27

ROBINSON NUCLEAR PROJECT DEPARTMENT  
POST OFFICE BOX 790  
HARTSVILLE, SOUTH CAROLINA 29550  
OCT 17 1986

Robinson File No: 13510E

Serial: RNP/86-4877

Dr. J. N. Grace  
Regional Administrator  
United States Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W. Suite 3100  
Atlanta, Georgia 30323

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
INSPECTION REPORT 86-21

Dear Dr. Grace:

Carolina Power and Light Company (CP&L) provides this response to the alleged violation discussed in the USNRC Inspection Report 86-21.

Alleged Severity Level IV Violation (RII-86-21-03-SL4)

10CFR50.54(q) requires the nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of 10CFR50, Appendix E, and the Planning Standards of 10CFR50.47(b). 10CFR50.47(b)(15) requires that radiological emergency response training be provided to those who may be called upon to assist in an emergency. 10CFR50, Appendix E, Section IV.F, requires that specialized initial and periodic retraining be provided for nine categories of emergency personnel, including Damage Control and Accident Assessment Teams. Section 5.6.1.1 of the Emergency Plan requires that training for emergency response personnel be provided in accordance with Plant Emergency Procedure-0653, "Performance of Training, Drills, and Exercises."

Contrary to the above, all personnel expected to respond in the event of an emergency have not been trained in accordance with the training procedure. "On-call" personnel were identified who had either not received initial emergency training or had not been retrained within the applicable timeframe. In addition, no personnel were designated as Accident Assessment or Damage Control Team members; nor had any training, initial or retaining, been provided to personnel in these areas.

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RESPONSE

1. Admission or Denial of the Alleged Violation

CP&L acknowledges the violation.

2. Reason for the Violation if Admitted

The Emergency Preparedness Training program was in a dual transition period at the time of the violation:

Transition #1 - Responsibility for training was being shifted from the Emergency Preparedness group to the Nuclear Training Section.

Transition #2 - The format of the training program was changing from one of self-study to one of formal classroom instruction.

During the transitions, major emphasis had been directed toward developing lesson plans for the formal classroom instruction sessions rather than ensuring the retraining frequencies were satisfied.

With respect to the training of Accident Assessment and Damage Control Team members, the Team leaders as well as their alternates had received sufficient training. The intent of the Emergency Preparedness plan was to rely on Team leaders to direct the individual activities of Team members under their control during and following an emergency situation.

3. Corrective Steps Which Have Been Taken and Results Achieved

Accident Assessment and Damage Control Team members have been designated and appropriate training in their responsibilities has begun. Retraining for other Emergency Response Organization personnel has also been provided.

4. Corrective Steps Which Will Be Taken to Prevent Repetition of the Violation

The Nuclear Training Section will utilize their computerized tracking system to schedule Emergency Preparedness training and retraining. Initial training for Accident Assessment and Damage Control Team members will continue to be provided.

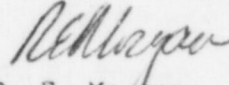
5. Date When Full Compliance Will Be Achieved

Full compliance is expected by March 31, 1987.

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If you have any questions concerning this response, please contact  
Mr. J. M. Curley at (803) 383-4524, extension 2367.

Yours very truly,



R. E. Morgan  
General Manager

H. B. Robinson Steam Electric Plant

DAS:ac

cc: Document Control Desk  
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