



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

August 18, 2011

Carolina Power and Light Company
ATTN: Mr. Robert J. Duncan, II
Vice President
H.B. Robinson Steam Electric Plant Unit 2
3581 West Entrance Road
Hartsville, South Carolina 29550

**SUBJECT: MID-CYCLE LETTER FOR H. B. ROBINSON STEAM ELECTRIC
PLANT, UNIT 2 (REPORT 05000261/2011006)**

Dear Mr. Duncan:

On August 10, 2011, the NRC staff completed its mid-cycle performance review of the H. B. Robinson Steam Electric Plant, Unit 2. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2010 through June 30, 2011. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. This performance review and enclosed inspection plan do not include security information. A separate letter will include the NRC's assessment of your performance in the Security Cornerstone and its security-related inspection plan.

The NRC determined the performance at Robinson Unit 2 during the most recent quarter was within the Degraded Cornerstone column of the NRC's Action Matrix. This determination was based on three findings classified as having low to moderate safety significance (White) which were identified in the third and fourth quarter of 2010. In a report dated December 7, 2010, the NRC issued the final significance determination and Notice of Violation for one finding documented in the NRC Problem Identification and Resolution report (05000261/2010006). The finding was classified as having low to moderate safety significance (White) in the Mitigating Systems cornerstone. In Inspection Report 05000261/2011008, dated January 31, 2011, the NRC documented the final significance determination and Notice of Violation for two findings; one finding was initially documented in Inspection Report 05000261/2010004 and the other finding was initially documented in Inspection Report 05000261/2010013. These findings were also classified as having low to moderate safety significance (White) in the Mitigating Systems cornerstone.

Based on the results of the 95002 inspection completed on June 9, 2011, the three White findings were closed. However, one of the findings, specifically 05000261/2010013-01, Failure to Comply with Conduct of Operations Procedure, will continue to be considered for agency actions in accordance with the Action Matrix until September 30, 2011. As a result, the NRC determined the performance at Robinson Unit 2 to be in the Regulatory Response Column of the Reactor Oversight Process Action Matrix as of July 1, 2011.

In its end of cycle assessment letter dated March 4, 2011 (ML110630055), the NRC opened a Substantive Cross-Cutting Issue (SCCI) with the aspect of complete, accurate and up-to-date design documentation, procedures, and work packages, and correct labeling of components, H.2(c). To address the SCCI, your staff has performed a root cause evaluation and prepared a comprehensive procedure upgrade project. Our evaluation of your root cause and planned corrective actions has determined those measures to be adequate. However, the implementation of the two-column format emergency operating procedures is not scheduled until the 1st quarter 2012. An inspection of the content and quality of those procedures must be performed prior to closure of the SCCI. Therefore, consistent with the 2010 end of cycle letter, the SCCI will remain open until the NRC has confidence that your corrective actions are sufficient, based in part on a reduction in the number of findings below the SCCI threshold. Because this letter is the second consecutive assessment letter documenting an SCCI with the same cross-cutting aspect, the NRC requests your staff to keep us informed on your progress and any schedule changes regarding the implementation of the two-column format emergency operating procedures. The NRC will continue to monitor your staff's effort and progress in addressing the SCCI by performing focused annual problem identification and resolution reviews of the actions to address this cross-cutting issue.

The enclosed inspection plan lists the inspections scheduled through December 31, 2012. 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.

We also plan on conducting a non-routine inspection, TI 2515/177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray System."

In the days following the Fukushima Dai-ichi nuclear accident in Japan, the Commission directed the staff to establish a senior-level agency task force to conduct a methodical and systematic review of the NRC's processes and regulations to determine whether the agency should make additional improvements to its regulatory system. The NRC has since completed Temporary Instruction (TI) 183, "Follow-up to Fukushima Dai-ichi Nuclear Station Fuel Damage Event," and TI-184, "Availability and Readiness Inspection of Severe Accident Management Guidelines (SAMGs)" at your facility. Results of these inspections can be found here: <http://www.nrc.gov/japan/japan-activities.html>. Additionally, on May 11, 2011, the agency issued NRC Bulletin 2011-01, "Mitigating Strategies," to confirm compliance with Order EA-02-026, subsequently imposed license conditions, and 10 CFR 50.54(hh)(2), and to determine the status of licensee mitigating strategies programs. On July 12, 2011, the NRC's Task Force made its recommendations to the Commission in its report, "Recommendations for Enhancing Reactor Safety in the 21st Century: The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident." The Commission is currently reviewing the Task Force's recommendations to determine whether additional actions may be warranted.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact Randall A. Musser at 404-997-4603 with any questions you may have regarding this letter.

Sincerely,

/Leonard D. Wert RA for/

Victor M. McCree
Regional Administrator

Docket No.: 50-261
License No.: DPR-23

Enclosure: Robinson Inspection/Activity Plan

cc w/encl.: (See page 4)

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact Randall A. Musser, Chief, Reactor Projects, at 404-997-4603 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/Leonard D. Wert RA for/

Victor M. McCree
Regional Administrator

Docket No.: 50-261
License No.: DPR-23

Enclosure: Robinson Inspection/Activity Plan

cc w/encl.: (See page 4)

X PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE X NON-SENSITIVE
ADAMS: X Yes ACCESSION NUMBER: Package: ML11230B102 Letter: ML11230B251 X SUNSI REVIEW COMPLETE

OFFICE	RII:DRP	RII:DRP	RII:DRP	RII:DRP	RII:ORA	RII:ORA	
SIGNATURE	Via email	JSD /RA/	RAM /RA/	RPC /RA/	LDW /RA/	LDW /RA for/	
NAME	JWorosilo	JDodson	RMusser	RCroteau	LWert	VMcCree	
DATE	08/16/2011	08/12/2011	08/15/2011	08/16/2011	08/16/2011	08/17/2011	
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: S:\DRP\PERIODIC ASSESSMENTS & REPORTS\EOC & MID-CYCLE\2011\MID-CYCLE\INPUT\RPB4\MC LETTERS\2011 MC LETTER ROBINSON REV1.DOCX

cc w/encl.:
Division of Radiological Health
TN Dept. of Environment & Conservation
401 Church Street
Nashville, TN 37243-1532

Sandra Threatt, Manager
Nuclear Response and Emergency
Environmental Surveillance
Bureau of Land and Waste Management
Department of Health and Environmental
Control
Electronic Mail Distribution

Robert J. Duncan II, Vice President
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Brian C. McCabe
Manager, Nuclear Oversight
Shearon Harris Nuclear Power Plant
Progress Energy
Electronic Mail Distribution

Scott D. West, Superintendent Security
H. B. Robinson Steam Electric Plant
Progress Energy
Electronic Mail Distribution

Joseph W. Donahue, Vice President
Nuclear Oversight
Progress Energy
Electronic Mail Distribution

David T. Conley, Senior Counsel
Legal Department
Progress Energy
Electronic Mail Distribution

John H. O'Neill, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, NW
Washington, DC 20037-1128

Richard Haynes
Director, Division of Waste Management
Bureau of Land and Waste Management
S.C. Department of Health and
Environmental Control
Electronic Mail Distribution

Kelvin Henderson, General Manager
Nuclear Fleet Operations
Progress Energy
Electronic Mail Distribution

Thomas Cosgrove, Plant General Manager
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Donna B. Alexander
Manager, Nuclear Regulatory Affairs
(interim)
Progress Energy
Electronic Mail Distribution

Robert P. Gruber, Executive Director
Public Staff - NCUC
4326 Mail Service Center
Raleigh, NC 27699-4326

W. Lee Cox, III, Section Chief
Radiation Protection Section
N.C. Department of Environmental
Commerce & Natural Resources
Electronic Mail Distribution

Greg Kilpatrick, Operations Manager
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Mark Yeager
Division of Radioactive Waste Mgmt.
S.C. Department of Health and
Environmental Control
Electronic Mail Distribution

cc w/encl. (continued next page)

cc w/encl. (continued)
Public Service Commission
State of South Carolina
P.O. Box 11649
Columbia, SC 29211

John W. Flitter
Director of Electric & Gas Regulation
South Carolina Office of Regulatory Staff
Electronic Mail Distribution

Chairman
North Carolina Utilities Commission
Electronic Mail Distribution

Henry Curry, Training Manager
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
H. B. Robinson Steam Electric Plant
2112 Old Camden Rd
Hartsville, SC 29550

William R. Gideon
Director Site Operations
H. B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Christos Kamilaris
Manager, Support Services
H.B. Robinson Steam Electric Plant, Unit 2
Progress Energy
Electronic Mail Distribution

Terry D. Hobbs, Plant General Manager
Brunswick Steam Electric Plant
Carolina Power & Light Company
Electronic Mail Distribution

Supervisor, Licensing/Regulatory Programs
(Vacant)
H. B. Robinson Steam Electric Plant
3581 West Entrance Rd.
Hartsville, SC 29550

CP&L

6

Letter to Robert Duncan from Victor M. McCree dated August 18, 2011

SUBJECT: MID-CYCLE LETTER FOR H. B. ROBINSON STEAM ELECTRIC
PLANT, UNIT 2 (REPORT 05000261/2011006)

Distribution w/encl.:

C. Evans, RII EICS

L. Douglas, RII EICS

OE Mail

RIDSNRRDIRS

PUBLIC

RidsNrrPMRobinson Resource

ROP Reports

Institute of Nuclear Power Operations (INPO)