



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

March 5, 2012

Carolina Power and Light Company  
ATTN: Mr. Randy Gideon  
Vice President  
H.B. Robinson Steam Electric Plant Unit 2  
3581 West Entrance Road  
Hartsville, SC 29550

**SUBJECT: ANNUAL ASSESSMENT LETTER FOR H. B. ROBINSON STEAM ELECTRIC  
PLANT, UNIT 2 (NRC INSPECTION REPORT 05000261/2011007)**

Dear Mr. Gideon:

On February 15, 2012, the NRC staff completed its end-of-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 January 1, 2011, through December 31, 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 that overall, Robinson Unit 2 operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Robinson Unit 2 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 inspection at your facility.

The NRC determined the performance at Robinson Unit 2 during the second quarter of 2011 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. 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 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, was 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. The NRC determined that as of October 1, 2011, the performance at H.B. Robinson Unit 2 was within the Licensee Response Column of the Reactor Oversight Process Action Matrix.

In its 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 been determined to be adequate. However, the implementation of the two-column format emergency operating procedures is not scheduled until the 2<sup>nd</sup> quarter 2012. An inspection of the content and quality of those procedures must be performed prior to closure of the SCCI. The quality of these procedure changes will establish the foundation for our confidence that the planned corrective actions will be sufficient to warrant closing the SCCI. Therefore, consistent with the 2011 mid-cycle letter, the SCCI will remain open. Because this letter is the third 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. In April 2011 an Independent Nuclear Safety Culture Assessment (NSCA) was completed at the request of your staff. During the 95002 inspection completed in June 2011 the NRC performed inspections regarding safety culture. No additional safety culture concerns were identified that had not already been captured by your NSCA. Therefore, considering the progress that has been made on both the Procedure Upgrade Project and the NSCA, no H.2(c) findings were identified in 2011, and the review completed during the 95002 inspection, an additional NSCA is not warranted at this time. The NRC will monitor your progress in addressing the SCCI by performing focused annual problem identification and resolution reviews of the actions to address this cross-cutting theme as well as during the licensed operator requalification program inspections. We are also requesting that you provide a response to the SCCI at the upcoming annual public meeting.

The enclosed inspection plan lists the inspections scheduled through June 30, 2013. 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 mid-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 several infrequently performed inspections which include: initial operator licensing examinations, TI 2515/177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray System," and TI 2515/182, "Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping and Tanks."

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 me at 404-997-4603 with any questions you may have regarding this letter.

Sincerely,

**/RA/**

Richard P. Croteau, Director  
Division of Reactor Projects

Docket No. 50-261, Docket No. 72-3  
License No. DPR-23, License No. SNM-2502

Enclosure: Robinson Inspection/Activity Plan

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/RA/

Richard P. Croteau, Director  
Division of Reactor Projects

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License No. DPR-23, License No. SNM-2502

Enclosure: Robinson Inspection/Activity Plan

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Letter to William R. Gideon from Richard P. Croteau, dated March 5, 2012.

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT - NRC INTEGRATED  
INSPECTION REPORT 05000261/2012007

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