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SUBJECT: Responds to violations noted in Insp Rept 50-261/90-13.
 Corrective actions: emergency procedures revised.

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H. B. ROBINSON STEAM ELECTRIC PLANT
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NRC INSPECTION REPORT NO. 50-261/90-13: REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Violation identified by NRC Inspection Report No. 50-261/90-13.

Severity Level IV Violation (RII-90-13-02)-SI4)

10 CFR 50, Appendix E, Section IV.F.5 requires that exercises provide for formal critiques in order to identify weak or deficient areas that need correction, and further provides that any weaknesses or deficiencies that are identified shall be corrected.

Contrary to the above, an exercise weakness identified at the critique for the 1989 Emergency Exercise for failure to activate the TSC and OSC in a timely manner was not corrected. Specifically, it was determined that the licensee's commitments for activation of the OSC and TSC (partial activation within 45 minutes and full activation within 75 minutes of an Alert declaration) were not acceptably demonstrated as indicated by the following observations: The OSC was activated 89 minutes after the ALERT declaration and the TSC was activated 125 minutes after the ALERT declaration.

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Reply

1. Admission of Denial of the Violation

CP&L acknowledges the violation.

2. Reason for the Violation

Appropriate actions were not taken by site management to correct the augmentation deficiencies identified in the 1989 exercise. The following causal factors contributed to the violation:

- a. There was no formal method for ensuring the availability of personnel to fill required Emergency Response Organization (ERO) positions after normal working hours.
- b. The procedural methodology for conducting the call-out process was determined to be ineffective.
- c. There was no method for verification of which qualified individuals were on-site to meet augmentation or activation requirements.
- d. There was a lack of guidance on activation of facilities without full staffing.

3. Corrective Steps Which Have Been Taken, and Results Achieved

Acknowledgment of and corrective actions for the deficiencies discussed above were the subject of a meeting requested by CP&L and held in NRC Region II offices on August 6, 1990. As discussed during that meeting, these corrective actions are as follows:

- a. Key positions for augmentation and activation of the ERO have been identified. In addition, personnel who are qualified for ERO positions have been designated and are responsible for ensuring that those positions are capable of being activated within the allotted time period on an 'around-the-clock' basis. A policy statement has been issued by the RNP/ Project Manager which delineates the requirement to have an ERO, and the accountability of each employee to ensure this requirement is fully met.
- b. Plant procedure PEP-171, "Emergency Communicator and Staff", has been revised to provide a new method for calling ERO personnel. This new method includes a 'beeper' activated group call-out system for key positions, which is supplemented by Non-Responding Emergency Communicators (NRECs) for the remainder of the ERO. This procedure also provides instructions for the NRECs to perform manual call-out should the ERO Group Call beepers fail to work.

- c. The Plant Emergency Procedures (PEPs) used by the leaders in each facility have been revised to ensure that the status of augmentation is being tracked and that the Site Emergency Coordinator (SEC) in the Control Room is provided this information. This includes a method whereby qualified ERO personnel log in by position, and communicate their availability to the SEC in the Technical Support Center, the Operations Support Center Leader in the OSC, and the Emergency Response Manager in the EOF. An on-call roster is also under development that will identify individuals who fill key ERO positions.
- d. The PEPs for the Site Emergency Coordinator, the Operation Support Center Leader, and the Emergency Response Manager duties have been changed to allow partial activation of facilities. Emphasis has been placed on removing activities such as offsite notification, dose projection, etc. from the Control Room as soon as practical. This will provide flexibility to activate under circumstances when, although all positions may not be filled, those positions needed to relieve the Control Room of some critical functions are in place.

4. Corrective Steps Which Will be Taken to Avoid Further Violations

As discussed in the August 6 meeting, the following future, long term corrective actions are planned:

- a. Additional training and qualification for individuals to support the ERO will be conducted.
- b. Personnel position descriptions will be revised to reflect ERO responsibility.
- c. An evaluation of on-shift ERO staffing levels will be conducted and adjusted as necessary.
- d. Emergency Response capability will be redemonstrated during a formal graded exercise.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the successful demonstration of Emergency Response capability by November 30, 1990.

Should you have any questions regarding this submittal, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,



Charles R. Dietz
Manager

Robinson Nuclear Project Department

RDC:lko

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO