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SUBJECT: Requests approval of proposed change to emergency plan, consisting of exception to TSC location guidance in Suppl 1 to NUREG-0737.Proposed change to Section 5.5.2 of emergency plan encl.

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10 CFR 50.4(b)(5)
10 CFR 50.54(q)

**Carolina Power & Light Company**
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No.: 11720, 13510
Serial: RNP/94-1979

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United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-26/LICENSE NO. DPR-23
CHANGE TO EMERGENCY PLAN - ELIMINATION OF COMMITMENT TO INCORPORATE THE TECHNICAL SUPPORT CENTER INTO THE PROTECTED AREA

Gentlemen:

In accordance with 10 CFR 50.54(q), Carolina Power & Light (CP&L) Company requests approval of a proposed change to the Emergency Plan for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The requested change consists of an exception to the Technical Support Center (TSC) location guidance in Supplement 1 to NUREG-0737, "Clarification of TMI Action Plan Requirements, Requirements for Emergency Response Capability." Specifically, the requested change would eliminate the current Emergency Plan commitment to incorporate the TSC, upon activation, into the protected area.

Currently, the TSC is located outside the protected area during non-emergency conditions. When the TSC is activated in response to an emergency, the protected area is expanded temporarily to incorporate the TSC. Approval of this requested change will result in decreasing the time required to activate the TSC and alleviating the necessity of diverting security manpower for realignment of the protected area boundary at the onset of an emergency requiring activation of the TSC. This requested change will also eliminate the need to maintain and/or upgrade specific security equipment whose sole function is to support such realignment of the protected area boundary. Existing compensatory measures will continue to ensure that effective methods are in place to provide for the necessary management interaction and exchange of technical information between the Control Room and the TSC. Should emergency response personnel be required to travel from one facility to another during an emergency, existing compensatory measures would also ensure easy access between the Control Room and the TSC. Enclosure 1 provides a description of the requested change, its justification, and the relevant compensatory measures. In addition, the effectiveness of the TSC has been observed during exercises and drills by NRC Region II emergency preparedness personnel.





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The same exception to the TSC location guidance in Supplement 1 to NUREG-0737 has previously been approved, as part of the NRC review of emergency response facility implementation in the 1980s, for the Beaver Valley Power Station and the Peach Bottom Atomic Power Station, Units 2 and 3. More recently, the NRC approved a similar exception for the Davis-Besse Nuclear Power Station by letter dated June 9, 1989. The CP&L justification and compensatory measures, described in Enclosure 1, are equivalent in function to those adopted by these other plants.

The proposed wording change to Plant Program Procedure (PLP) - 007, "Robinson Emergency Plan," is provided in Enclosure 2. Upon approval of the change, the Industrial Security Plan will be revised to delete Section 3.3 and Figures 3.7 and 3.8 and will be submitted in accordance with 10 CFR 50.54(p).

We have concluded that this requested change decreases the effectiveness of the original Emergency Plan as approved by the NRC. However, due to the compensatory measures, the overall effectiveness of the Emergency Preparedness program will be enhanced.

CP&L is submitting this change request as a Cost-Beneficial Licensing Action, which will result in a lifetime savings for HBRSEP of approximately $50,000.

Questions regarding this matter may be referred to Mr. K. R. Jury at (803) 857-1363.

Very truly yours,

R. M. Krich
Manager - Regulatory Affairs

Enclosures

c: Mr. S. D. Ebneter, Regional Administrator, USNRC, Region II (w/ two copies of enclosures)
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

# ENCLOSURE 1
# H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
# PROPOSED CHANGE TO EMERGENCY PLAN - ELIMINATION OF COMMITMENT TO INCORPORATE THE TECHNICAL SUPPORT CENTER INTO THE PROTECTED AREA

## INTRODUCTION

The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Emergency Plan stipulates that the Technical Support Center (TSC) is to be located within the protected area upon activation. Prior to activation of the TSC, the Security force members must realign the protected area boundary to envelope that portion of the Training Building that currently houses the TSC facilities. The realignment normally involves performance of a search of all areas of the TSC and compensatory measures to enhance intrusion detection.

This commitment in the HBRSEP Emergency Plan was adopted during the initial design of the emergency response facilities in response to the following NRC guidance.

- NUREG-0737, "Clarification of TMI Action Plan Requirements, Requirements for Emergency Response Capability, Supplement 1" (Generic Letter 82-33), dated December 17, 1982, Section 8.2, Technical Support Center (TSC), which states, in part:

  The TSC will be ". . . located within the site protected area so as to facilitate necessary interaction with control room, OSC, EOF and other personnel involved with the emergency."

- NUREG-0696, "Functional Criteria for Emergency Response Facilities - Final Report," dated January 1, 1981, Section 2.2, which states:

  "During recent events at nuclear power plants, telephone communications between the facilities were ineffective in providing all of the necessary management interaction and technical information exchange. This demonstrates the need for face-to-face communications between TSC and control room personnel . . ."

  "The TSC shall be as close as possible to the control room . . . ."

  "The walking time from the TSC to the control room shall not exceed two minutes . . ."

  "The two minute travel time . . . does include the time required to clear any security checkpoints. There should be no major security barriers between these two facilities other than access control stations for the TSC and the control room."

The HBRSEP commitment to incorporate the TSC into the protected area upon activation is found in CP&L correspondence, dated April 9, 1982, docket Nos. 50-261 and 50-324/325, which provided drawings to the NRC and requested concurrence with the locations for the TSC and EOF. In this correspondence, CP&L states the following. "...The proposed location and security provisions allow timely access from the TSC to the control room with no intervening security barriers . . ."

Furthermore, CP&L correspondence, dated April 15, 1983, docket Nos. 50-261 and 50-324/325, responding to Generic Letter 82-33, which states . . . "We anticipate being able to meet NRC requirements listed in Supplement 1 to NUREG-0737 for the construction of Emergency Response Facilities . . ."

## DESCRIPTION OF THE CHANGE

Since the initial commitment to comply with the TSC location guidance in Supplement 1 to NUREG-0737, significant experience has been gained via activation of the TSC during numerous drills, exercises, and real events; and significant program enhancements have occurred (e.g., installation of the Emergency Response Facility Information System). The intent of the TSC location guidance, as indicated in the previously quoted portion of NUREG-0696, is to provide for the necessary management interaction and exchange of technical information between the Control Room and the TSC. Our review of this basis resulted in the determination that the intent of the TSC location guidance can be met without requiring the TSC to be enveloped into the protected area.

We request approval to change Section 5.5.2 of the HBRSEP Emergency Plan to take exception to the TSC location guidance in Supplement 1 of NUREG-0737. The specific proposed wording change to the Emergency Plan is provided in Enclosures 2.

## JUSTIFICATION OF THE CHANGE

We have compared the current Emergency Response capabilities at the HBRSEP with those at Beaver Valley Atomic Power Station, Peach Bottom Atomic Power Station, Units 2 and 3, and the Davis-Besse Nuclear Power Station and have concluded that the same pertinent capabilities as discussed, are in place at the HBRSEP site. We have determined that the cessation of the practice of incorporating the TSC into the protected area prior to its activation is justifiable and does not decrease the overall effectiveness of the Plans for the following reasons.

Sufficient data and information from the Control Room are available in the TSC via diverse communication and data acquisition and display systems. In addition, the Emergency Response Organization includes a position responsible for the coordination of Control Room/TSC activities. These capabilities are described in more detail in the below discussion

of Compensatory Measures. These capabilities effectively provide for sufficient management interaction and exchange of technical information between the Control Room and the TSC, as demonstrated through numerous drills and exercises and real events, which presented varied challenges. This same experience demonstrates that the need to dispatch Emergency Response Organization staff from the TSC to the Control Room has not been realized and is clearly not identifiable as a critical capability in responding effectively to an emergency event.

The requirement to incorporate the TSC into the protected area delays the activation of the TSC for up to 45 minutes while the Security force establishes the TSC protected area boundary and undertakes security searches of the enveloped area. This detracts from the timely activation of the TSC and delays the transfer of responsibilities from the Control Room staff to key Emergency Response Organization staff located in the TSC.

The capability to place the TSC inside the protected area requires the allocation of critical Security manpower and maintenance of additional security hardware. The availability of the Security forces to respond to emergencies, especially security events, would be enhanced if this requirement were deleted. In addition, a reduction in security hardware and associated maintenance costs would be achieved.

COMPENSATORY MEASURES

The following technological capabilities are currently in place and provide the TSC and Control Room staff with numerous methods for exchange of information and receipt of response data.

- HBRSEP capabilities as described in Attachment 6.1 of HBRSEP Emergency Plan are comprised of the following.

  - Emergency Response Facility Information System (ERFIS)
  - Public Address System
  - PBX Telephone System
  - Back-Up Telephone System
  - Selective Signaling System
  - Facsimile Transmission Capabilities
  - VHF Radio
  - NRC Emergency Notification System (i.e., FTS 2000)
  - Emergency Data System that provides real time plant status
  - EP Vision - closed circuit TV of the TSC Command Room displayed in the Control Room and EOF.

In particular, the installation and integration of the ERFIS on January 1, 1987, at HBRSEP provided a significant enhancement to the ability to receive plant data in the TSC. The integration of this system greatly reduced any need to dispatch personnel to the Control Room from the TSC.

To further facilitate effective management interaction and exchange of technical information between the TSC and the Control Room, the HBRSEP Emergency Response Organizations includes a position titled "Plant Operations Director." This position is manned by a senior operations individual and is responsible for the coordination of Control Room/TSC activities. By procedure, this position first responds to the Control Room for face-to-face discussions with the Control Room staff to review plant status and establish a common understanding of accident mitigation efforts underway prior to proceeding to the TSC. Once in the TSC, the Plant Operations Director actively facilitates accident mitigation and plant status coordination, and a proactive dialogue between the two facilities.

Should it become necessary to travel between the TSC and the Control Room, the increase in travel time as a result of the TSC no longer being in the protected area is minimal. Therefore, typical radiological protective measures would be sufficient for personnel traveling between facilities. In addition, the Physical Security program at HBRSEP provides the explicit capability to expedite the movement of personnel into the protected area during emergency situations. In an emergency involving a radiological release or a potential for radiological release, where it is necessary to protect the public health and safety, search requirements for emergency response personnel and vehicles may be exempted. This process is addressed in the HBRSEP Security Procedure (SP) - 007, "Access Control and Personnel Identification," and Section 3.2.15 of the HBRSEP Industrial Security Plan.

## SUMMARY

The current practice of placing the TSC inside the protected area at HBRSEP provides no consequential benefit to the emergency response capabilities. The facility activation delay time and the Security manpower diversion to perform the protected area extension under the present program are considered as detracting from the emergency preparedness and security programs.

The existing emergency response compensatory measures provide effective management interaction and exchange of technical information between the TSC and Control Room, and sufficient latitude exists to ensure timely travel between the facilities should the need arise. Furthermore, the effectiveness of the TSC has been observed during exercises and drills by NRC Region II emergency preparedness personnel.

For these reasons, as well as because of the cost-beneficial aspects of this change, we request that this change to the Emergency Plan be approved.