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 KRICH, R.M. Carolina Power & Light Co. *Rev. 1/22/96*
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SUBJECT: Forwards Rev 32 to Plant Program Procedure PLP-007,
 "Robinson Emergency Plan." Encl 1 cross-ref of emergency
 plan revs w/affected sections.

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**Carolina Power & Light Company**

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No: 11720
Serial: RNP-RA/95-0202

NOV 27 1995

United States Nuclear Regulatory Commission
Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
TRANSMITTAL OF EMERGENCY PLAN REVISION

Gentlemen:

In accordance with 10 CFR 50.54(q) and 10 CFR 50.4(b)(5), Carolina Power & Light (CP&L) Company transmits the enclosed revision to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Emergency Plan. The effective date for the enclosed revision is October 27, 1995; therefore submittal of this revision is required by November 27, 1995. This revision replaces the previous revision in its entirety.

We have reviewed the changes to the Emergency Plan as described in the enclosed cross-reference, and have determined that they do not decrease the effectiveness of the Emergency Plan, since the changes are administrative and the Emergency Plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

Enclosure 1 is a cross-reference of the Emergency Plan revisions with the affected sections. If you have any questions on this subject, please contact Mr. G. C. Johnson at (803) 857-1767.

Very truly yours,

R. M. Krich
Manager - Regulatory Affairs

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JSK/klb

Enclosure:

1. Cross-Reference of Emergency Plan Revisions With Affected Sections.

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
(w/Enclosure including 2 copies of Plan)

Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP
(w/Enclosure including 1 copy of Plan)

H. B. Robinson Steam Electric Plant, Unit No. 2
Cross-Reference of Emergency Plan Revisions With Affected Sections

<u>Section</u>	<u>Revision</u>	<u>Reason for Revision</u>
Table of Contents	Adjust page listings to agree with procedure	Procedure upgrade
2.3	Delete "Date"	Information not needed, little value added
2.4	Add "Updated" to title	Accurately reflect reference
5.1.3.1.4	Delete "initially" and "completes a checklist each calendar year in his area of responsibility"; add "requalified"	Emergency Response Organization (ERO) positions that perform their normal line function or administrative tasks are not required to fill out requalification checklists
5.1.3.1.4	Move "The checklist requires review of written material as well as drill participation" to section 5.6	More appropriate location
Entire procedure	Change Shift Supervisor to Shift Supervisor/Superintendent-Shift Operations	Reflect new on shift Operations organization
Entire procedure	Change Robinson Radiological Emergency Plan to Robinson Emergency Plan	Consistency with title
5.3.2.1, paragraph 1	Change Technical Support Personnel to Engineering Personnel	Reorganization of Engineering
5.3.2.5.2	Remove parenthesis from "is designated"	Not required, typographical error
5.3.2.12	Delete "functions are contained in PEP-165..." Add "functions are the same as normal responsibilities and additional procedures are not required."	Procedure reduction, remove unnecessary procedures

5.3.3.2	Add "/Joint Information Center Personnel" to title	Reflect new staffing arrangement where site provides majority of personnel
5.3.3.2.1	Change title to "Company Spokesperson"; delete old responsibilities; add responsibilities from Plant Emergency Procedure (PEP) - 657	Reflect new staffing arrangement where site provides majority of personnel and new Joint Information Center (JIC) procedure (PEP-657)
5.3.3.2.2	Change title to "JIC Director"; delete old responsibilities; add responsibilities from PEP-657	Reflect new staffing arrangement where site provides majority of personnel
5.3.3.2.3	Change title to "Company Technical Spokesperson"; delete old responsibilities; add responsibilities from PEP-657	Reflect new staffing arrangement where site provides majority of personnel
5.3.3.2.4	New step/title, Technical Specialist; add responsibilities from PEP-657	Reflect new staffing arrangement where site provides majority of personnel
5.3.4.1.3	Change title to "...Bureau of Solid and Hazardous Waste Management"	South Carolina Department of Health and Environmental Control (SCDHEC) reorganization
5.3.4.1.10	Add South Carolina Operational Radiological Emergency Response Plan	Define acronym
Fig. 5.3.2-1	Change "Corporate Spokesman" to "Company Spokesperson"; change "Shift Supervisor" to "Superintendent-Shift Operations/Shift Supervisor"	Reflect previously noted (i.e., Section 5.3.3.2.1) change, and reorganization of Operations Unit

Table 5.3.5-1	Change (c) to (e) for Technical Support Center (TSC) and Emergency Operations Facility (EOF) at Alert; Add "/Notification" to note "e."	Reflect current practice, procedure
5.3.5-1	Add Operations Support Center (OSC) to on-site	Reflect current practice, procedure
5.4.2.2.2, 1st paragraph	Revise portion describing the protective action recommendation scheme	Clarify intent of statement and location of information
5.4.2.2.2, 2nd paragraph	Delete "for a protective action of" and "for"	Clarify and improve statement
5.4.4.2.2, 4th paragraph	Delete "that was employed to arrive at the site." Add "as appropriate."	Mass transportation may be provided in some cases
5.4.4.3.2, item 6	Delete "pocket chambers"; add "direct reading dosimetry"	Allows use of Electronic Dosimetry as well as Self-Reading Pocket Dosimeters, etc.
5.4.4.7.2, 2nd paragraph	Revise portion describing the protective action recommendation scheme	Clarify intent of statement and location of information
	Delete reference to step	Reference to step is no longer required
Table 5.4.3-1	Delete Abnormal Operating Procedure (AOP) - 029 and AOP - 030; Add AOPs - 032, 033, 035 and End Path Procedures (EPPs) - 025, 026, 027	Update reference
Fig. 5.4.4-2	New Figure, Protective Action Recommendation (PAR) flow chart	Add PAR methodology to plan
5.5.2, 1st paragraph	Delete "inside the fenced Security area"; and add "adjacent to the Protected."	In support of removing TSC from the Protected Area
	Delete last sentence	Procedure deleted; Command room is permanently set-up and satellite rooms are set up by function procedure

5.5.2, 2nd paragraph	Add "Primary Access Point" to "Emergency Diesel Generator"	Specifically describe emergency power source
5.5.4	Delete last sentence	Procedure deleted; Command Room is permanently set-up
5.5.5, 2nd paragraph	Delete reference to position and corporate personnel	JIC is staffed by site and southern division personnel
5.5.6.5	Change address of Lee County Emergency Operations Center (EOC)	EOC has been relocated to Church St.
5.5.7.6, 5th paragraph	Delete "Radiological Health"; add "Solid and Hazardous Waste"	SCDHEC reorganization
Table 5.5.0-1	Change State Emergency Operations Center functional objective 1 to "response" vs. "responsible"	Correct typographical error
Table 5.5.0-1	Delete duplicate "Chesterfield, South Carolina" and "Darlington, South Carolina"	Duplicate
Table 5.5.0-1	Delete "Courthouse"; add "Hospital Square, West Church Street"	New location of Lee County EOC
Table 5.5.7-4	Correct range on Ludlum - 3 instrument to 0-200 mR/hr	Correct reference
5.6.1	Add "for designated positions"; define "annual" as it applies to requalification training for ERO	Administrative positions no longer fill out a qualification checklist; clarify "annual" as it is used for requalification training requirements
5.6.1.1.4	Delete "annual"; add "once per calendar year"	Reflect current training methodology

5.6.1.2.2, 3rd paragraph	Delete "annual"; change "manager" to "supervisor"; change reference from PEP-651 to PEP-001	Term is defined in first paragraph as once per calendar year; reorganization; Emergency Preparedness improvement form is contained in PEP-001
5.6.1.3	Delete "request the plant supervisors" and "applicable," "in coordination with Director, Corporate Emergency Preparedness located in the Corporate Office"	EP staff now maintains all procedures; Corporate staff does not have a role in all listed functions
5.6.4	Delete "/" between plant and supervisor; delete "substantive" description for Plant Nuclear Safety Committee (PNSC) review requirement	Typographical error; PNSC will review all changes to the Plan
5.7.2.4	Change "Engineering Management" to "Responsible Engineering Superintendent" and "Technical Support Unit" to "Robinson Engineering Support Section"	Reorganization of Engineering Section
5.7.5.4	Change "Radiological Health" to "Solid and Hazardous Waste"	SCDHEC reorganization
Fig 5.7.2.1	Change "Corporate Spokesman" to "Company Spokesperson"; and "Headquarters Public Information (PI) Coordinator" to "Corporate Communications Department"	Reorganization of Public Information (PI) function and staffing; update terminology
Att. 6.1, A.1.4	Delete reference to radio control station in the control room	Base station is located in old cable spread room
Att. 6.2 (B)	Replace letter RNP/94-0629 with 95-0060	To provide the latest Byerly Hospital Agreement letter
Att. 6.2 (C)	Replace letter RNP/85-292 with 95-0058	To provide the latest Wilson Medical Center Agreement letter
Att. 6.2 (E)	Replace letter RNP/87-3805 with 95-0056	To provide the latest Hartsville Internal Medicine Agreement letter

Att. 6.2 (F)	Replace letter RNP/85-218 with 95-0049	To provide the latest Lake Robinson Rescue Squad Agreement letter
Att. 6.2 (G)	Replace letter RNP/85-219 with 95-0054	To provide the latest Darlington County Emergency Medical Services Agreement letter
Att. 6.2 (H)	Replace letter RNP/87-586 with 95-0053	To provide the latest Hartsville Rescue Squad Agreement letter
Att. 6.2 (I)	Replace letter RNP/85-213 with 95-0052	To provide the latest Hartsville Fire Department Agreement letter
Att. 6.2 (J)	Replace letter RNP/85-216 with 95-0131	To provide the latest Darlington County Sheriff's Department Agreement letter
Att. 6.2 (K)	Replace letter RNP/91-0946 with 95-0050	To provide the latest Bishopville Police Department Agreement letter
Att. 6.2 (L)	Replace letter RNP/85-215 with 95-0051	To provide the latest Chesterfield County Sheriff's Department Agreement letter
Att. 6.2 (M)	Replace US Department of Energy letter dated May 5, 1981, with letter dated May 16, 1995	To provide the latest US Department of Energy Agreement letter
Att. 6.2 (O)	Replace letter RNP/94-0755 with 95-0059	To provide the latest Darlington County 911 Communications Center Agreement letter
Att. 6.3, 18 a	Add item "a" onsite responsibility for recovery/reentry	Inadvertent omission
Att. 6.4	Revise Emergency Plan and Procedure distribution lists	To provide the current distribution

Att. 6.6, IIA	Add a space between "in" and "containment"; delete "in" from "into"	Correct typographical errors
Att. 6.6, Pg 9 of 9	Correct format, change IV to "In Vessel"	Correct typographical error, clarify reference
Att. 6.7, Pg 1 of 2	Add "Area" to Site Emergency title; delete reference to PEP-165, "Support Services Coordinator"	Correct reference, procedure deleted for procedure consolidation
Att. 6.7, Pg 2 of 2	Add "Samples" to title of PEP-253; delete reference to PEP-206 "Activation of TSC/EOF"	Correct typographical error, incorporated into other procedures and command rooms permanently set up
Att. 6.8 pg 3 of 5	Add Figure 5.4.4-2 under Criteria J.7	New Figure added concerning PAR determination