

# CATEGORY 2

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 AUTH. NAME      AUTHOR AFFILIATION  
 WILKERSON, T.M.      Carolina Power & Light Co.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Provides response to violations noted in insp rept  
 50-261/97-13 re emergency preparedness exercise weakness.  
 Corrective actions: written training matl developed & routed  
 for review to SSOs & site emergency coordinators.

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

Robinson File No: 13510  
Serial: RNP-RA/98-0014

FEB 12 1998

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
RESPONSE TO NRC INSPECTION REPORT NO. 50-261/97-13  
EMERGENCY PREPAREDNESS EXERCISE WEAKNESS

Gentlemen:

This letter provides the Carolina Power & Light (CP&L) Company response to the exercise weakness identified in NRC Inspection Report No. 50-261/97-13 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 which was transmitted by NRC letter dated December 31, 1997. The weakness involves a failure to promptly declare a Notification of Unusual Event during the 1997 Biennial Emergency Preparedness Exercise. In accordance with the letter transmitting the weakness, the attachment provides the corrective action that CP&L has taken or plans to take and the estimated date of completion for the corrective action.

Should you have any questions regarding this matter, please contact Mr. H. K. Chernoff at (803) 857-1437.

Very truly yours,

T. M. Wilkerson  
Manager - Regulatory Affairs

ALG/alg  
Attachment

c: ✓ Mr. K. P. Barr, Chief, Plant Support Branch, USNRC, Region II  
Mr. B. B. Desai, USNRC Senior Resident Inspector, HBRSEP  
Mr. L. A. Reyes, Regional Administrator, USNRC, Region II  
Mr. J. W. Shea, USNRC Project Manager, HBRSEP

Santa  
Response due  
3/19

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
RESPONSE TO  
EMERGENCY PREPAREDNESS EXERCISE WEAKNESS

Description of the Weakness

During the 1997 Biennial Emergency Preparedness Exercise for the H. B. Robinson Steam Electric Plant, Unit No. 2 an exercise weakness was identified for failure to promptly declare a Notification of Unusual Event. The weakness was described in NRC Inspection Report No. 50-261/97-13, dated December 31, 1997, and is quoted below.

"A Notification of Unusual Event (NOUE) was declared at 8:10 a.m. due to a fire in the protected area lasting greater than 10 minutes. This was a correct classification according to the scenario, but it was not timely. Specifically, the Fire Alarm reset time was 7:25 a.m. with a visual confirmation of the fire at 7:38 a.m. Accordingly, the 10 minute fire parameter was met by 7:48 a.m., 22 minutes before the NOUE declaration was made and 32 minutes before the notification message was initiated. This delayed NOUE declaration was identified as an exercise weakness and is being tracked as Inspector Follow-up Item (IFI) 50-216/97-13-01."

The NRC documented in "Emergency Preparedness Position (EPPOS) on Timeliness of Classification of Emergency Conditions," dated August 1, 1995, that emergencies be classified by the Control Room within 15 minutes of the time when indications are available to Control Room operators that an Emergency Action Level (EAL) has been exceeded. The CP&L evaluation found that the weakness was caused by a lack of a procedural requirement to communicate Emergency Preparedness (EP) continuing training needs to the organization responsible for training licensed operators. As a result, licensed operators were not aware of the NRC position with respect to timeliness of classifying an emergency.

Training regarding the NRC position had been provided previously to members of the Emergency Response Organization (ERO) by the Technical Training unit in 1996. Licensed operators were not included in the training relating to the NRC position that was conducted in 1996, because the continuing training needs for licensed operators were provided by a separate Licensed Operator Continuing Training (LOCT) unit. In 1996, the responsibility for training non-licensed members of the ERO shifted from the Technical Training unit to the EP unit. Prior to the shift in training responsibility, the process for communicating continuing training needs to the LOCT unit was informal, and the need for training operators on the NRC position on timely classification of emergencies was not adequately communicated to the LOCT unit, due to the

informality of the process. Subsequent to the shift in responsibility, licensed operators attended continuing training provided by the EP unit.

#### **The Corrective Action That Has Been Taken**

Written training material was developed and routed for review to the SSOs and Site Emergency Coordinators (SECs) that communicated the NRC position for prompt declaration of events following determination that an EAL has been exceeded.

Licensed operators were trained in LOCT on the need to declare an emergency within 15 minutes of the time when the EAL(s) for a classification have been met.

#### **The Corrective Action That Will Be Taken**

Emergency Procedure EPPRO-03, "Training and Qualifications," will be revised to require routing of EP Continuing Training Program material to the Operations Real Time Training (ORTT) program. The ORTT Program is conducted by the Operations unit and provides training information to on-shift operators. The ORTT personnel will review for incorporation into ORTT as appropriate information provided to them by the EP Continuing Training personnel. This revision to the procedure will be implemented by March 20, 1998.

The NRC position and CP&L expectations regarding prompt classification of an emergency will be incorporated into the lesson plan used for training SECs. Initial training for SECs will not be conducted until the lesson plan material is updated. The SEC initial training program will be updated by March 20, 1998.

The training material that was previously provided to the SSOs and SECs will be re-issued for review and signature to the Senior Reactor Operators, the Shift Technical Advisors, and the SECs. This training material provides the NRC position and CP&L Management expectations for prompt declaration of events following determination that an EAL has been exceeded. This training material will be reviewed by March 20, 1998.

In addition, the NRC position regarding timeliness of emergency classification will be added to procedure EPCLA-02, "Emergency Action Level User's Guide." The revised procedure revision will be implemented by March 20, 1998.

**CHECKLIST**

ROI 0917

**EVALUATION OF LICENSEE CORRECTIVE ACTIONS FOR VIOLATIONS**Inspection Rpt. No. 97-13  
Plant Name H.B. Robinson<sup>EX: Weakness</sup>  
Violation No. 50-261/97-13-01  
Response Received Feb 18, 98**ASSESSMENT BY RII MANAGERS OF LICENSEE'S CORRECTIVE ACTION:**

Was the Root Cause for the Violation Addressed? If no, explain.

yesWere the Steps Taken Adequate to Correct the Problem and Prevent Future Violation? yes

Results Achieved:

N/A

Additional Corrective Steps That Will Be Taken:

N/ADate of Full Compliance Indicated: 3/20/98[Signature]  
Section Chief3/25/98  
Date**Recommended Actions:**

Response Letter



Telephone Call To Licensee



Letter Requesting Supplemental Information

90002

APPROVED BY:

[Signature]  
Branch Chief3/25/98  
Datecc. Division Director  
Original to Docket File