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FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
AUTH.NAME: UTLEY, E.E. AUTHOR AFFILIATION: Carolina Power & Light Co.
RECIP.NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Operating Reactors Branch 1

SUBJECT: Responds to 781109 request that facility Emergency Plan be revised to incorporate NRC staff recommendations. Attachment 1 is a detailed response to NRC positions & attachment 2 is the revised emergency plan. *566 RPT*

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Carolina Power & Light Company

February 6, 1979

FILE: NG-3514(R)

SERIAL: GD-79-324

Mr. A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

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RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION - EMERGENCY PLAN

Dear Mr. Schwencer:

In your letter of November 9, 1978, you requested that the H. B. Robinson Plant's Emergency Plan be revised to incorporate your Staff's recommendations. Please find enclosed in Attachment 1 a detailed response to your staff's positions, and in Attachment 2 the revised emergency plan.

Carolina Power & Light Company feels the H. B. Robinson Plant's Emergency Plan fully complies with the provisions of 10CFR50, Appendix E, and incorporates the major points and intent of Regulatory Guide 1.101 (rev. 1).

We trust this submittal meets your requirements.

Yours very truly,

E. E. Utley
Senior Vice President
Power Supply

EEU/jc
Enclosures

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H. B. ROBINSON RESPONSE TO NRC STAFF POSITIONS
(NOVEMBER 9, 1978) ON EMERGENCY PLAN

Please find below Robinson Plant's response to your November 9, 1978 submittal containing NRC Staff positions on the Robinson Plant's Emergency Plan. Our responses correspond to the NRC submittal's numerical listing.

- (1) & (2) The enclosed revision incorporates the "State of South Carolina Peacetime Radiological Emergency Response Plans" Protection Action Guides and Offsite Emergency Classifications. Thus, this revision fully satisfies NRC positions (1) and (2).
- (3) Section I.B.6 of this revision does address the training requirements for equivalent personnel listed in NRC position (3)(a)-(f) and (h). An implementing Training Instruction, TI-300, General Employee Training, specifies annual Emergency Plan training for all permanent plant employees.

In response to (3)(g), agreements of support which are held with the police and rescue groups and training will be provided in accordance with I.B.6. Additionally, voluntary assistance agreements with Hartsville Fire Department and Pine Ridge Volunteer Fire Department have been made and are referenced in Volume 19 (Fire Protection Manual) of the Plant Operating Manual. The participation in annual drills by these Fire Departments is not a requirement of 10CFR50, Appendix E.

In response to (3)(i), Headquarters Support Personnel, we feel that our Corporate support personnel are fully qualified, and their periodic participation in plant drills, direct support preparing revisions to the Plan, and by periodic meetings and plant visits, more than adequately satisfies the requirements and intent of 10CFR50's training requirements.

Volume 19 (Fire Protection Manual) of the Plant Operating Manual includes specific requirements for:

- (1) quarterly drills of fire brigade
- (2) frequency of drills greater than annual for the plant.

Your (3) sub (3) mentions annual drills for "repair and damage control teams." The H. B. Robinson Plant does not use or employ this nomenclature--any repair or damage control functions are provided by personnel included in the above.

The Plan has provisions for annual review (I.B.7) of Emergency Plan and Procedures, performed by the Plant Manager and the Plant Nuclear Safety Committee.

The Plan does include provision for annual radiological drills; drill participation of appropriate offsite agencies meets the requirements of 10CFR50, Appendix E. During drills, lines of communication are tested as well as employment of a call-back scheme. Critiques and appropriate followup actions are taken for all drills.

- (4) Region II, Office of I&E, has reviewed our updated letters of agreement (on file at the Plant) with offsite agencies and found no items of noncompliance or deviations in the entire area of Coordination With Offsite Support Agencies. However, the Plan will append these letters of agreement (by April, 1979) and attempt to obtain updated agreements at least every two years.