

APPENDIX B

TO FACILITY OPERATING LICENSE NO. DPR-23

H. B. ROBINSON STEAM-ELECTRIC PLANT

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

ENVIRONMENTAL SPECIFICATION

(NON-RADIOLOGICAL)

8003 200436

H. B. ROBINSON STEAM ELECTRIC PLANT

UNIT 2

ENVIRONMENTAL SPECIFICATIONS

(NON-RADIOLOGICAL)

TABLE OF CONTENTS

<u>Section</u>		<u>Page</u>
1.0	Definitions	1-1
2.0	Limiting Conditions for Operation (N/A)	2-1
2.1	Nonradiological Limits (N/A).	2-1
3.0	Environmental Monitoring.	3-1
3.1	Nonradiological Monitoring.	3-1
4.0	Special Studies and Requirements.	4-1
4.1	Exceptional Occurrences	4-1
4.2	Biological Studies.	4-3
5.0	Administrative Controls	5-1
5.1	Responsibility.	5-1
5.2	Review and Audit.	5-2
5.3	Procedures.	5-2
5.4	Plant Reporting Requirements.	5-5
5.5	Changes in Environmental Specifications and Permits . . .	5-5
5.6	Records Retention	5-6

NPDES Permit: NPDES permit is the current National Pollutant Discharge Elimination System Permit issued by United States Environmental Protection Agency or the South Carolina Department of Health and Environmental Control (SCDHEC) to Carolina Power & Light Company as pertains to H. B. Robinson Unit 2. This permit authorizes CP&L to discharge controlled waste waters from the H. B. Robinson Steam-Electric Plant, into the waters of the State of South Carolina.

SCDHEC: South Carolina Department of Health and Environmental Control.

Site: On-site includes any area within the property owned by CP&L specifically described in the H. B. Robinson Unit 2 EIS, Section 1.1. Off-site includes all other areas.

Station and Unit: Station refers to H. B. Robinson Steam-Electric Plant Units 1 (fossil-fueled) and 2 (nuclear-fueled). Unit refers only to H. B. Robinson Unit 2.

Twice Yearly: As defined in the NPDES Permit.

NEPA: National Environmental Policy Act.

USEPA: United States Environmental Protection Agency, an agency of the United States Government.

NRC: Nuclear Regulatory Commission.

Weekly: As defined in the NPDES Permit.

2.0 Limiting Conditions for Operation

2.1 Nonradiological Limits

Not Applicable

3.0 Environmental Monitoring

In consideration of the provisions of the Clean Water Act (33 USC Section 1251, et seq.) and in the interest of avoiding duplication of effort, the conditions and monitoring requirements related to water quality and aquatic biota are specified in the National Pollutant Discharge Elimination System (NPDES) Permit issued by the U. S. Environmental Protection Agency and/or South Carolina Department of Health and Environmental Control to Carolina Power & Light Company. This permit authorizes CP&L to discharge controlled waste water from the H. B. Robinson Steam Electric Plant, into specified waters of the State of South Carolina.

The Nuclear Regulatory Commission will be relying on the NPDES permit for protection of the aquatic environment from non-radiological effluents.

4.0 Special Studies and Requirements

4.1 Exceptional Occurrences

4.1.1 Unusual or Important Environmental Events

Requirements

The licensee shall record any occurrence of unusual or important events which are observed by management or other qualified personnel. In conjunction with any required monitoring program, the licensee shall document an occurrence of unusual or important events that could indicate potential environmental impact causally related with station operation. The following are examples: significant onsite plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; significant fish kills according to the definition of the State of South Carolina near or downstream of the site.

This special requirement shall commence with the date of issuance of these Environmental Specifications and continue until approval for modification or termination is obtained from the NRC in accordance with Subsection 5.6.1.

Action

Copies of the biological monitoring reports filed with SCDHEC shall be concurrently submitted to NRC.

Bases

Providing reports to the NRC of extraordinary or significant events as described above is necessary for responsible and orderly regulation of the nation's system of nuclear power reactors. Notification to NRC may serve to alleviate the magnitude of the environmental impact or to place it into a perspective broader than that available to the licensee. The information thus provided may be useful or necessary to others concerned with the same environmental resources. NRC also has an obligation to be responsive to inquiries from the public and the news media concerning potentially significant environment events at nuclear power stations.

4.1.2 Exceeding Limits of Other Relevant Permits

Requirements

The licensee shall notify the NRC of occurrences of exceeding the limits specified in relevant permits and certificates issued by other Federal, State and local agencies by providing to the NRC a copy of the notice as submitted to the relevant agency.

This special requirement shall commence with the date of issuance of these environmental specifications contained herein and continue until approval for modification or termination is obtained from the NRC in accordance with Subsection 5.6.

Action

The licensee shall provide the NRC copies of reports to other NPDES cognizant agencies in the event of excursion beyond a limit specified in a permit or certificate issued by another Federal, State or local agency.

Bases

NRC is required under NEPA to maintain an awareness of environmental impacts causally related with the construction and operations of facilities licensed under its authority.

4.2 Biological Monitoring Program

Requirements

The licensee shall provide the results of biological studies when such studies are required by the NPDES permit issuing agency.

Action

The licensee shall submit informational copies of biological studies in accordance with the schedule required by the NPDES Permit.

Bases

The environmental assessments made in the FES-OL of 1975 (Section 5.5.2) determined that the environmental impacts resulting from continued operation of Unit 2 with once-through cooling were acceptable, but that a monitoring program should be instituted to verify if there were substantial changes in the pertinent ecological parameters considered in the assessments. The licensee implemented a comprehensive monitoring program and presented results of the program in a Section 316 Demonstration Report, submitted to USEPA (CP&L, 1976).

The submittal of results from the programs required by the NPDES Permit will allow the staff to follow the consequences of the NRC licensing action.

References

CP&L, 1976, H. B. Robinson Steam Electric Plant - 316 Demonstration, June 30, 1976.

5.0 Administrative Controls

5.1 Responsibility

The Plant General Manager has the responsibility for operating the plant in compliance with these Specifications. Management responsibilities for the biological monitoring programs referenced in the Environmental Specifications rests with the Manager of Environmental Technology who reports to the Vice President, Technical Services Department.

5.2 Review and Audit

5.2.1 Independent Review

Independent review and audit of plant operations and specifications for environmental matters will be performed by Corporate Nuclear Safety & Quality Assurance Audit. Corporate Nuclear Safety & Quality Assurance Audit report through the Vice President of Nuclear Safety & Research to the Chief Operating Officer.

5.3 Procedures

5.3.1 Normal Operating Procedures

Written procedures shall be prepared and followed to implement the Environmental Specifications. They shall be subject to audit. These procedures will be reviewed and approved by the cognizant supervisor.

5.3.4 Changes in Practices, Station Design or Operation

Changes in practices, station design or operation may be made subject to conditions described below:

- A. The licensee may (1) make changes in the station design and operation, (2) make changes in the environmental programs described in the NPDES Permit and (3) conduct tests and experiments not described in the NPDES Permit without prior Commission approval, unless the proposed change, test or experiment involves an unreviewed environmental question as defined in B below.

- B. A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental impact statement as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements thereto, environmental impact appraisals, or in initial or final adjudicatory decisions; or (2) a significant change in effluents or power level as specified in 51.5(b) of 10 CFR 51; or (3) a matter which has not previously been reviewed and evaluated in the documents specified in (1) of this section and which may have a significant adverse environmental impact. The Plant General Manager shall decide if a proposed change, test or experiment constitutes an unreviewed environmental question.
- C. The licensee shall maintain records of changes in procedures and in facility design or operation made pursuant to these specifications. The licensee shall also maintain records of tests and experiments carried out pursuant to paragraph "A" of this subsection.
- D. Changes in the NPDES program shall be governed by SCDHEC.

5.4 Plant Reporting Requirements

Reports will be made as required in sections 4.1.1, 4.1.2 and 4.2.

5.5 Changes in Environmental Specifications and Permits

Changes and additions to required Federal (other than NRC), State, local and regional authority permits and certificates for the protection of the environment that pertain to the requirements of these Environmental Specifications shall be reported to the NRC. In the event that the licensee initiates or becomes aware of a request for changes to any of the water quality requirements, limits or values stipulated in any certification or permit issued pursuant to Section 401 or 402 of the Clean Water Act and which are also the subjects of an Environmental Specifications reporting requirement, NRC shall be notified.

If a permit or certification, in part or in its entirety, is appealed and stayed, and if this causes water quality requirements of Sections 401 or 402 of the Clean Water Act to become nonapplicable, NRC shall be notified as described above. If, as a result of the appeal process, the 401 and 402 requirements are changed, the change shall be dealt with as described in the previous paragraph of this section.

5.6 Records Retention

Records and logs relative to station operation shall be made and retained in a manner convenient for review and inspection. These records and logs shall be made available to NRC on request.

5.6.1 The following records shall be retained for three years.

- (a) Records of changes to the Environmental Program including, when applicable, records of NRC approval of such changes.
- (b) Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment.
- (c) Records of changes to permits and certifications required by federal (other than NRC), state, local and regional authorities for the protection of the environment.
- (d) Routine reports submitted to the NRC.
- (e) Records of review and audit activities.
- (f) Events, and the reports thereon, which are the subject of nonroutine reports to the NRC.