

## REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000324  
 50-324 Brunswick Steam Electric Plant, Unit 2, Carolina Power 05000325  
 50-325 Brunswick Steam Electric Plant, Unit 1, Carolina Power  
 AUTH. NAME: UTLEY, E. E. AUTHOR AFFILIATION: Carolina Power & Light Co.  
 RECIP. NAME: EISENHUT, D. G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Responds to NRC 810218 ltr re post-TMI requirements for emergency operations facility. Util position meets intent of staffing requirements. Staffing commitments described in encl. Tables 1 & 2 will be implemented by 820701.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgm's (OL's)

## NOTES:

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	RAD ASMT BR		1	1	REG FILE	01	1 1
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	LPDR	03	1	1	NSIC	04	1 1

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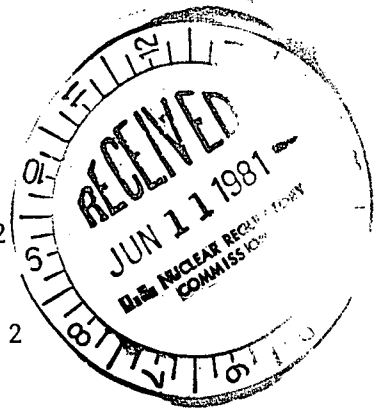
Carolina Power & Light Company

June 9, 1981

File: NG-3514(B)&(R)

Serial No.: NO-81-995

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555



H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
BRUNSWICK STEAM ELECTRIC PLANT UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
EMERGENCY RESPONSE STAFFING

Dear Mr. Eisenhut:

Summary

Your letter of February 18, 1981 concerning Post-TMI Requirements for the Emergency Operations Facility provided a table which lists the required minimum plant staffing and required augmentation of that staffing in response to a plant emergency. On April 9, 1981, Carolina Power & Light Company (CP&L) responded by stating that a further review of the criteria was necessary and that CP&L would provide its commitments in this area at a future date. CP&L has completed its study and hereby provides its commitments in the area of plant staffing and augmentation during emergencies. CP&L believes that its position meets the intent of the Staff's requirements.

Discussion

As mentioned above, CP&L has completed its internal study of the criteria for staffing requirements for emergencies. The attached Tables I and II summarize CP&L's commitments. CP&L has placed emphasis on functional requirements being met in a timely manner to ensure that adequate resources are available to control an emergency condition. It is believed that the personnel listed in the attached tables are adequate to fulfill the necessary functions during a plant emergency.

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The following clarifications are provided to facilitate full understanding of CP&L's position and commitments made. First, individual off-site survey teams will initially consist of at least one person with health physics (HP) expertise, and if available, one other person, preferably another HP. Off-site survey teams will be supplemented by on-site and/or off-site personnel from other CP&L operating plants or the Corporate Office. Second, the senior manager for the Emergency Operations Facility will initially be a line manager from the site until such time that he can be relieved by a senior manager from CP&L's Corporate Office. And third, CP&L believes that emphasis should be placed on the functions to be performed and not on the specific level of the individual performing the function. An individual qualified to perform a task will be allowed to count as fulfilling a required position regardless of his normal plant responsibilities. For example, CP&L will allow an HP foreman to serve as an HP technician.

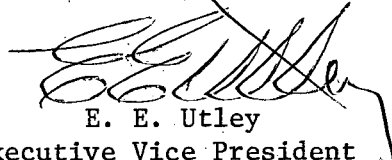
CP&L believes that staffing for an emergency condition is a continuous process starting with the notification of specific individuals who have important functions to perform in an emergency but who cannot be contacted at exactly the same time. The specific notification priority and procedures are contained in the Plant Emergency Procedures. CP&L also believes that emergency staffing requirements are goals to be strived for and are dependent on individual notification and transit time. Because emergency conditions may require different levels and types of expertise, CP&L does not support a plan to always have the same staffing requirements on a short term, 30-minute basis which would be later supplemented by the complete emergency response staff. Although some individuals will be on site shortly after notification, it would be more prudent to set a longer term goal to have the emergency response staff listed in Tables I and II in place by approximately 60 minutes after notification. This 60-minute goal should not be considered as cast in concrete, but should be strived for to implement an emergency response staff which can be available to combat any emergency situation in a timely manner. In addition to the staffing levels contained in Tables I and II, CP&L can draw from its additional personnel expertise from other individuals located in the site area, CP&L's other nuclear plants and/or the Corporate Office. Supplemental staffing capabilities from these resources are contained in the Company emergency plans and procedures.

Conclusion

Most large emergencies would take a long time to develop to the point that full augmentation would be required. Trending would in most cases provide advance notification of a worsening situation and allow for augmentation well in advance. The NRC suggested time limits are somewhat arbitrary and not indicative of how most situations would develop. CP&L, however, will continue to strive to meet the time requirements as shown in Tables I and II in the most efficient manner and believes that our overall position fulfills the intent of the emergency staffing requirements. CP&L will implement the staffing commitments described in Tables I and II by July 1, 1982 for both the Brunswick Steam Electric Plant and the H. B. Robinson Steam Electric Plant.

If you have any questions on this subject, please contact our staff.

Yours very truly,

A handwritten signature in dark ink, appearing to read "E. E. Utley", is written over the typed name. The signature is stylized with a large, sweeping "E" and a long, horizontal stroke extending to the right.

E. E. Utley  
Executive Vice President  
Power Supply and  
Engineering & Construction

ONH/jc (7134)  
Attachment

TABLE I  
MINIMUM STAFFING FOR EMERGENCIES FOR THE  
H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2

Major Functional Area	Major Tasks	Position Title/Expertise	Capability for Additions	
			On Shift	60 Min.
Plant operations and assessment of operational aspects		Shift Foreman (SRO)	1	1
		Senior Control Operator	1	1
		Control Operators	2	2
		Auxiliary Operators	2	2
Emergency direction and control (Emergency Coordinator)**		Shift Technical Advisor, Shift Supervisor, or designated facility manager	1**	-
Notification/communication****	Notify licensee, state, local, and federal personnel and maintain communication		1**	1
Radiological accident assessment and support of operational accident assessment and protective actions	Emergency Operations Facility (EOF) Director	Senior Manager	-	1
	Offsite dose assessment	Senior Health Physics (HP) expertise	-	1
	Radiation Protection (access control; HP coverage, search, and rescue; personnel monitoring; dosimetry)	HP Technicians	2**	2
	Protective Action			
	In Plant Surveys		1	1
	On site (out-of-plant)		-	1**
	Off site surveys		-	2
	Chemistry/ radiochemistry	Rad/Chem Technicians	1	1

TABLE I (continued)

Major Functional Area	Major Tasks	Position Title/Expertise	Capability for Additions	
			On Shift	60 Min.
Plant system engineering, repair, and corrective actions	Technical support	Shift Technical Advisor	1	-
		Core/thermal hydraulics	-	1
		Electrical	-	1
		Mechanical	-	1
	Repair and corrective actions	Mechanical Maintenance	1**	1
		Radwaste Operator	-	1
		Electrical Maintenance	1**	1
		Instrument and Control (I&C) Technician	-	1
Firefighting			Fire brigade per technical specifications	Local support
Rescue operations and first aid			2**	Local support
Site access control and personnel accountability	Security, firefighting communications, personnel accountability	Security Personnel	All per security plan	
TOTAL			9	22

\*For each unaffected nuclear unit in operation, maintain at least one shift foreman, one control room operator, and one auxiliary operator except that units sharing a control room may share a shift foreman if all functions are covered.

\*\*May be provided by shift personnel assigned other functions.

\*\*\*Overall direction of facility response to be assumed by EOF Director when all centers are fully manned. Direction of minute-to-minute facility operations remains with senior manager in technical support center or control room.

\*\*\*\*May be performed by engineering aide to shift supervisor.

TABLE II

MINIMUM STAFFING FOR EMERGENCIES FOR THE  
BRUNSWICK STEAM ELECTRIC PLANT UNIT NOS. 1 AND 2

Major Functional Area	Major Tasks	Position Title/Expertise	Capability for Additions	
			On Shift	60 Min.
Plant operations and assessment of operational aspects		Shift Supervisor (SRO)	1	1
		Shift Foreman (SRO)	1	1
		Control Operators	2	2
		Auxiliary Operators	2	2
Emergency direction and control (Emergency Coordinator)**		Shift Technical Advisor, Shift Supervisor, or designated facility manager	1**	-
Notification/ communication****	Notify licensee, state, local, and federal personnel and maintain communication		1**	1
Radiological accident assessment and support of operational accident assessment and protective actions	Emergency Operations Facility (EOF) Director	Senior Manager	-	1
	Offsite dose assessment	Senior Health Physics (HP) expertise	-	1
	Radiation Protection (access control; HP coverage, search, and rescue; personnel monitoring; dosimetry)	HP Technicians	2**	2
	Protective Action			
	In Plant Surveys		1	1
	On site (out-of-plant)		-	1**
	Off site surveys		-	2
	Chemistry/ radiochemistry	Rad/Chem Technicians	1	1

TABLE II (continued)

Major Functional Area	Major Tasks	Position Title/Expertise	Capability for Additions	
			On Shift	60 Min.
Plant system engineering, repair, and corrective actions	Technical support	Shift Technical Advisor	1	-
		Core/thermal hydraulics	-	1
		Electrical	-	1
		Mechanical	-	1
	Repair and corrective actions	Mechanical Maintenance	1**	1
		Radwaste Operator	-	1
		Electrical Maintenance	1**	1
		Instrument and Control (I&C) Technician	-	1
Firefighting			Fire brigade per technical specifications	Local support
Rescue operations and first aid			2**	Local support
Site access control and personnel accountability	Security, firefighting communications, personnel accountability	Security Personnel	All per security plan	
TOTAL			9	22

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