

APPENDIX B

TO FACILITY OPERATING LICENSE NO. DPR-23
H. B. ROBINSON STEAM ELECTRIC PLANT
UNIT 2

CAROLINA POWER & LIGHT COMPANY
DOCKET NO. 50-261

ENVIRONMENTAL PROTECTION PLAN

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H. B. ROBINSON STEAM ELECTRIC PLANT
UNIT 2

ENVIRONMENTAL PROTECTION PLAN
(Non-radiological)

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 OBJECTIVES OF THE ENVIRONMENTAL PROTECTION PLAN	1-1
2.0 ENVIRONMENTAL PROTECTION ISSUES	2-1
2.1 Aquatic Issues	2-1
2.2 Terrestrial Issues	2-2
3.0 CONSISTENCY REQUIREMENTS	3-1
3.1 Plant Design and Operation	3-1
3.2 Reporting Related to the NPDES Permits and State Certification	3-1
3.3 Changes Required for Compliance with Other Environmental Regulations	3-2
4.0 ENVIRONMENTAL CONDITIONS	4-1
4.1 Unusual or Important Environmental Events	4-1
5.0 ADMINISTRATIVE PROCEDURES	5-1
5.1 Review and Audit	5-1
5.2 Records Retention	5-1
5.3 Changes in Environmental Protection Plan	5-1
5.4 Plant Reporting Requirements	5-2
5.4.1 Nonroutine Reports	5-2

1.0 OBJECTIVES OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) is to provide for protection of environmental values during construction and operation of the nuclear facility. The principal objectives of the EPP are as follows:

- (1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.
- (2) Coordinate NRC requirements and maintain consistency with other Federal, State, and local requirements for environmental protection.
- (3) Keep NRC informed of the environmental effects of facility operation and of actions taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's NPDES permit.

2.0 ENVIRONMENTAL PROTECTION ISSUES

In the FES-OL dated April 1975, the Staff considered the environmental impacts associated with the continued operation of the H. B. Robinson Nuclear Steam Electric Plant, Unit 2. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

In the FES-OL, the Staff identified the need for an ecological monitoring program to verify that continued operation does not significantly increase the level of impacts on the ecological parameters considered by the Staff in its assessments (FES-OL Section 5.5.2.5). For the above purpose, the Staff found the licensee's demonstration program, as proposed to EPA pursuant to Section 316 of the Clean Water Act, to be acceptable with the following additional requirements:

- (i) implementation of a Staff-approved program for collection of fish impingement and ichthyoplankton entrainment data, and
- (ii) continuation of the ecological monitoring program for a minimum period of two years (FES-OL Section 6.2.3).

The licensee has conducted the EPA-approved Section 316 program which addressed both of the additional requirements recommended by the Staff. The Regional Administrator of EPA Region IV has found the plant to be in compliance with Section 316(a) and Section 316(b) based on the licensee's demonstration program.

The NRC will rely on the EPA and the State of South Carolina for the continued protection of the aquatic environment from non-radiological operational impacts via the NPDES permit and State certification.

3.0 CONSISTENCY REQUIREMENTS

3.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests, or experiments do not involve an unreviewed environmental question, and do not involve a change in the Environmental Protection Plan.* Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record any environmental evaluation of such activity.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this subsection.

3.2 Reporting Related to the NPDES Permit and State Certification

Violations of the NPDES permit or the State certification (pursuant to Section 401 of the Clean Water Act) shall be reported to the NRC by providing copies of the reports which are submitted in accordance with the NPDES permit or certification. The licensee shall also provide the NRC with copies of the results of the following studies when they are submitted to the permitting agency:

- (i) Section 316 studies, if required for NPDES permit renewal
- (ii) Chlorine Minimization Study
- (iii) Other biological studies which are submitted to the NPDES permitting agency.

2.2 Terrestrial Issues

With regard to terrestrial impacts, the Staff concluded in the FES-OL that continued operation of the plant and its associated transmission system would result in an acceptable level of impact (FES-OL Section 5.5.1.3). Monitoring of terrestrial biota in the vicinity of Robinson Lake was included as a part of the licensee's successful demonstration program under Section 316(a) of the Clean Water Act. There were no issues raised via the study results which would necessitate further monitoring of terrestrial biota.

The Staff has identified the need for controlled use of herbicides if such are used for maintenance of transmission rights-of-way. NRC requirements with regard to this terrestrial issue are specified in Subsection 4.2 of this EPP.

Changes and additions to the NPDES permit or the State certification shall be reported to the NRC within 30 days following the date the licensee is notified in writing of the approved change. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

The NRC shall be notified of changes to the effective NPDES permit proposed by the licensee by providing the NRC with a copy of the proposed change which is submitted to the permitting agency. The notification of a licensee-initiated change shall include a copy of the requested revision submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES permit when the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are required to achieve compliance with other Federal, State, or local environmental regulations are not subject to the requirements of Section 3.1.

*This provision does not relieve the licensee of the requirements of 10CFR50.59.

4.0 ENVIRONMENTAL CONDITIONS

4.1 Unusual or Important Environmental Events

If a properly trained biologist or other scientist determines that there has been any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation, it shall be recorded and promptly reported to the NRC within 24 hours of determination and reporting to the plant manager by telephone, telegraph, or facsimile transmissions followed by a written report per Subsection 5.4.1. The following are possible examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, excessive fish kills, and an increase in nuisance organisms or conditions.

No routine monitoring programs are required to implement this condition.

5.0 ADMINISTRATIVE PROCEDURES

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records and logs relative to the environmental aspects of plant 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.

Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained for the life of the plant. All other records, data, and logs relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Request for change in the Environmental Protection Plan shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the Environmental Protection Plan.

5.4 Plant Reporting Requirements

5.4.1 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of an event identified under 4.1. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics; (b) describe the probable cause of the event; (c) indicate the action taken to correct the reported event; (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems; and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State, or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the time it is submitted to the other agency.