



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

May 5, 2016

Richard Michael Glover, Site Vice President
H.B. Robinson Steam Electric Plant
Duke Energy
3581 West Entrance Road, RNPA01
Hartsville, SC 29550

SUBJECT: H.B. ROBINSON NUCLEAR PLANT - NOTIFICATION OF INSPECTION AND
REQUEST FOR INFORMATION

Dear Mr. Glover:

During the week of June 27-July 1, 2016, the U.S. Nuclear Regulatory Commission (NRC) will perform a baseline Radiation Safety Inspection at the Robinson Nuclear Plant (NRC Inspection Procedures (IPs) 71124.01, Radiological Hazard Assessment and Exposure Controls; 71124.08 Radioactive Solid Waste Processing and Radioactive Material Handling, Storage; and portions of Temporary Instruction (TI) 2800/041, Title 10 CFR Part 37 Materials Security Review – At Facilities with a Title 10 CFR Part 73 Physical Protection Program). In order to minimize the impact to your onsite resources and to ensure a productive inspection, we have enclosed a request for documents needed for this activity. The NRC requests that these documents be provided to the inspectors no later than June 10, 2016.

We have discussed the schedule for these inspection activities with your staff, and understand that our regulatory contact for this inspection will be Mr. Scott Connelly (843) 857-1569 of your organization. If there are any questions about this inspection or the material requested, please contact the lead inspector, Robert Kellner at (404) 997-4508, or the Chief of Plant Support Branch 1, Brian Bonser at (404) 997-4653.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public inspections, exemptions, requests for withholding" of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, and its Enclosure, will be available electronically

for public inspection in the NRC Public Document Room, or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS); accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html>.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control numbers, 3150-0008, 3150-0011, 3150-0014, 3150-0044, and 3150-0135. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

Sincerely,

/RA/

Brian R. Bonser, Chief
Plant Support Branch 1
Division of Reactor Safety

Docket No. 50-261
License No. DPR-23

Enclosure:
Pre-Inspection Document Request

for public inspection in the NRC Public Document Room, or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS); accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html>.

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OFFICE	RII:DRS	RII:DRS					
SIGNATURE	RXK3	BRB1					
NAME	KELLNER	BONSER					
DATE	5/5/2016	5/5/2016	5/ /2016	5/ /2016	5/ /2016	5/ /2016	5/ /2016
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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LETTERS\ROBINSON\2016\ROB_2016003_PSB1_RP_DOC REQUEST_DRAFT.DOCX

Pre-Inspection Document Request

Occupational and Public Radiation Safety Cornerstone

Inspection Dates: June 26-July 1, 2016

Documents Due by: June 10, 2016

Licensee: H.B. Robinson Nuclear Plant

Docket Number: 05000261

Inspection Procedures (IPs):	IP 71124.01	Radiological Hazard Assessment and Exposure Controls
	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage
	TI 2800/041	Title 10 CFR Part 37 Materials Security Review - At Facilities with a Title 10 CFR Part 73 Physical Protection Program

Note: Unless specified otherwise, the current version of these documents is expected. Electronic media is preferred if readily available (The preferred file format is MSWord, or searchable “.pdf” files on CDROM). *Note that the inspectors cannot accept data provided on USB or “flash” drives due to NRC IT security policies.* To the extent possible, please organize the information in the order shown below. Experience has shown that a poorly organized CD leads to a less efficient inspection and places additional burden on licensee staff. If there are questions regarding the documents requested, please do not hesitate to contact the lead inspector.

Documentation for inspection procedure 71124.01 is requested from May 15, 2015 to the present, and from July 21, 2014 to present for inspection procedure 71124.08. This reflects the last time these areas were inspected. We would prefer as much of the information as possible in electronic form. An index to the CD contents is also helpful. For those items requesting a list of documents/areas, the inspector will select documents/areas from the list for on-site review.

If you have any questions, please call Robert Kellner at (404) 997-4508. Thank you in advance for your effort in putting together this material.

Miscellaneous

1. List of primary site contact(s) for each inspection area including name(s) and telephone numbers.
2. Plant Management, Radiation Protection, and Chemistry organizational charts w/ contact numbers.
3. List of radiation protection procedures, including title and number.
4. Corrective Action Program (CAP) procedure(s).

Enclosure

71124.01 - Radiological Hazard Assessment and Exposure Controls

(Last Inspected May 2015)

1. List of active Radiation Work Permits (RWPs), including their administrative limits, electronic dosimeter dose rate limit, and dose limit.
2. List of locations, or plant maps indicating the location, of all LHRAs and VHRAs. Include areas with the potential to become a LHRA during routine operations or outages.
3. Most recent survey of all Locked HRAs and VHRAs (as applicable).
4. Procedures related to HP controls (e.g. Posting, labeling, surveys, RWPs, contamination control, HRA/LHRA/VHRA control, key control, control of divers, special controls during fuel offload, hot spots, etc.).
5. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm follow up, etc.).
6. List of Nationally Tracked Sources, change of owner ship and copies of any National Source Tracking System (NSTS) transaction documentation (e.g., annual reconciliation).
7. Most recent sealed source inventory record.
8. List of all non-fuel items stored in spent fuel pool.
9. All self-assessments and audits covering HP controls since May 1, 2015.
10. List of CAP nonconformance reports (AR, CR, NCR, etc.) related to HP controls (e.g. keyword searches for radworker error, HP technician error, posting issues, HRA/LHRA/VHRA issues, survey problems, etc.) issued since May 1, 2015. This should include CAP nonconformance reports where the cause was listed as human performance. *This should be a list of corrective action documents containing an (AR, CR, NCR, etc.) number and brief description, not full documents.*
11. All CAP nonconformance reports (AR, CR, NCR, etc.) related to Nationally Tracked Sources since May 1, 2015.

71124.08 - Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation

(Last Inspected July 2014)

1. All procedures/guidance documents describing licensee compliance with 10 CFR Parts 20, 61, and 71, and 49 CFR Parts 170-189. Procedures/manuals should include:
 - Solid and liquid radwaste processing procedures.
 - Procedure(s) for transferring radioactive waste resin and sludge discharges into shipping/disposal containers.
 - Waste stream mixing and/or sampling procedures, including: (1) waste concentration averaging; (2) use of scaling factors and calculations used to account for difficult-to-measure radionuclides; and (3) ensuring waste stream composition data accounts for changing operational parameters.
 - Shipping/transportation procedures.
 - Cask loading and closure procedures (licensee and vendor) applicable to last three cask transports.
 - List of Radioactive Material (RAM) storage areas, including satellite RCAs.
 - Monitoring impact of long-term storage (e.g. build-up of gases produced by waste decomposition, chemical reactions, container deformation, loss of container integrity, rerelease of free-flowing water).
 - Process Control Program (PCP).

2. Liquid and solid radwaste system diagrams and detailed system descriptions (e.g., information that might be contained in curricula for training new system engineers)
3. List of all shipments made since July 21, 2014 (shipping logs)
4. List, and documentation, of any changes made to the radioactive waste processing systems (liquid and solid) and/or the PCP since July 2014, and associated 10 CFR Part 50.59 documentation, as appropriate.
5. List of all abandoned solid and liquid radwaste processing equipment
6. Last two 10 CFR Part 61 analyses for each waste stream (DAW, resins, filters, etc.), including quality assurance data (e.g., in-house vs. vendor lab comparisons, current results vs. database)
7. Copies of applicable transport cask Certificate of Compliance for the last three transport cask shipments.
8. Most recent self-assessment or audit of Shipping/radwaste processing and RAM storage programs.
9. List of CAP nonconformance reports (AR, CR, NCR, etc.) related to involving radioactive waste and radioactive material processing and/or transportation (e.g. keyword searches for RAM, shipping, radwaste, Part 61, etc.) issued since July 1, 2014. *[This should be a searchable list of corrective action documents containing a number and brief description, not full CRs.]*
10. Available for onsite review during the inspection:
 - Site drawing(s) showing the location of all stored radioactive materials and all stored radioactive waste.
 - Plant drawings sufficient to permit the inspector to walk-down the liquid and solid radioactive waste processing systems to verify current system configuration/ operation agree with the descriptions contained in the UFSAR and in the PCP.
 - Documentation describing the status of any radioactive waste process equipment that is not operational and/or is abandoned in place.
 - Information concerning the site's waste disposal volume and waste reduction program.
 - Training and qualification records for personnel responsible for radioactive waste
 - Training curriculum and primary lesson plans for qualifying persons, including vendors, for radwaste processing, packaging, and making shipments of radioactive materials and radioactive waste as specified by 49 CFR 172.

Technical Instruction 2800/041 - Title 10 CFR Part 37 Materials Security Review – At Facilities with a Title 10 CFR Part 73 Physical Protection Program (Radiation Protection portions only)

1. All site specific and corporate procedures related to 10 CFR Part 37 compliance (storage of RAM, 10 CFR Part 37 Security Plan, etc.).*
2. List of all known/designated locations of Category 1 and 2 material.
3. All supporting calculations for determination of whether an aggregation of RAM meets the definition of Category 1 or Category 2 (e.g., warehouse calculation).
4. Any additional radiation protection procedures that identify radiation protection interaction with security, or requirements related to 10 CFR Part 37 compliance.

**Please do not include Safeguards or Official Use Only information in the submittal. That information can be reviewed onsite.*

Assistance Requested During On-Site Inspection

- Identification of work activities available during the inspection for inspector observations, including notification of pre-job briefings, notification of risk significant work activities, and audio/visual surveillance for remote job coverage
- HP assistance in plant walkdowns of areas identified for storage of Category 1 and 2 materials.
- Health physics assistance in plant walk-downs assessing access controls, e.g. verifying the posting and locking of entrances to high and very high radiation areas (HRA and VHRA), and SFP controls.
- Health physics assistance in plant walk-downs/job coverage of ongoing activities to assess access controls.

Inspector Contact Information:

Robert Kellner
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US NRC Region II
(404) 997-4508
robert.kellner@nrc.gov

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U.S. Nuclear Regulatory Commission
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Atlanta, GA 30303

LIST OF ACROYNMS

CAP	Corrective Action Program
DAW	Dry Active Waste
HRA	High Radiation Area
LER	Licensee Event Report
LHRA	Locked High Radiation Area
NSTS	National Source Tracking System
PCP	Process Control Program
QC	Quality Control
RAM	Radioactive Material
RWP	Radiation Work Permit
UFSAR	Updated Final Safety Analysis Report
VHRA	Very High Radiation Area