



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

March 11, 2019

Ernest J. Kapopoulos, Jr.  
Site Vice President  
H.B. Robinson Steam Electric Plant  
Duke Energy  
3581 West Entrance Road, RNPA01  
Hartsville, SC 29550

**SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT -- EMERGENCY PREPAREDNESS  
EXERCISE INSPECTION REQUEST FOR INFORMATION**

Dear Mr. Kapopoulos:

From May 20 – 24, 2019, the U.S. Nuclear Regulatory Commission (NRC) will perform a baseline Emergency Preparedness exercise inspection at the H.B. Robinson Steam Electric Plant. The inspection will evaluate activities in the Emergency Preparedness cornerstone using NRC Inspection Procedures (IPs) 71114.01, Exercise Evaluation; 71114.04, Emergency Action Level and Emergency Plan Changes; and the Emergency Preparedness sections of 71151, Performance Indicator Verification. Prior to the onsite inspection period, inspectors will review the proposed exercise scenario using IP 71114.08, Exercise Evaluation – Scenario Review.

Experience has shown that this inspection is resource-intensive for both the NRC inspectors and your staff. To minimize the impact to your onsite resources and to ensure a productive inspection, we have enclosed a request for documents needed for this inspection. It is important that all of these documents are up-to-date, and complete, in order to minimize the number of additional documents requested during the preparation, and/or the onsite portions of the inspection.

We have discussed the schedule for these inspection activities with your staff, and understand that our regulatory contact for this inspection will be Dave Pitsley (843-951-1763) of your organization. If there are any questions about this inspection or the material requested, please contact the lead inspector, Steven Sanchez at 404-997-4418 ([steven.sanchez@nrc.gov](mailto:steven.sanchez@nrc.gov)), or the Chief, Operations Branch 2, Eugene Guthrie at 404-997-4662.

This letter and its enclosure will be made available for public inspection and copying at <https://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

**/RA/**

Eugene F. Guthrie, Chief  
Operations Branch 2  
Division of Reactor Safety

Docket Nos.: 50-261  
License Nos.: DPR-23

Enclosure:  
Document Request List

cc: Distribution via Listserv

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT EMERGENCY PREPAREDNESS  
EXERCISE INSPECTION REQUEST FOR INFORMATION dated March 11, 2019

**DISTRIBUTION:**

C. Fontana, RII, DRS  
S. Sanchez, RII, DRS  
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RIDSNNRRDIRS  
Public

\* See previous page for concurrence

☒ PUBLICLY AVAILABLE    ☐ NON-PUBLICLY AVAILABLE    ☐ SENSITIVE    ☒ NON-SENSITIVE

ADAMS: ☒ Yes    ACCESSION NUMBER: **ML 19070A266**    ☒ SUNSI REVIEW COMPLETE    ☒ FORM 665 ATTACHED

|             |               |               |               |  |  |  |
|-------------|---------------|---------------|---------------|--|--|--|
| OFFICE      | RII:DRS/OB2   | RII:DRS/OB2   | RII:DRS/OB2   |  |  |  |
| SIGNATURE   | <b>JSW3</b>   | <b>SPS</b>    | <b>GXG</b>    |  |  |  |
| NAME        | J. Walker     | S. Sanchez    | E. Guthrie    |  |  |  |
| DATE        | 3/ 5 /2019    | 3/ 7 /2019    | 3/ 11 /2019   |  |  |  |
| E-MAIL COPY | <b>YES</b> NO | <b>YES</b> NO | <b>YES</b> NO |  |  |  |

OFFICIAL RECORD COPY    DOCUMENT NAME: G:\DRS\IIOB\IEMERGENCY PREPAREDNESS\RFIS\2019\ROBINSON 2019 EP  
EXERCISE INSPECTION RFI.DOCX

## **Document Request List**

Inspection Dates: May 20 – 24, 2019

|                               |             |   |
|-------------------------------|-------------|---|
| Inspection Procedures (IP's): | IP 71114.01 | Exercise Evaluation                               |
|                               | IP 71114.04 | Emergency Action Level and Emergency Plan Changes |
|                               | IP 71114.08 | Scenario Evaluation                               |
|                               | IP 71151    | Performance Indicator Verification                |

**Note:** This is a list of the documents to be provided to the inspectors upon arrival onsite. The current version of these documents is expected unless specified otherwise. The first seven italicized items under IP 71114.01 are requested as early as practical, but no later than 45 days prior to the exercise, to support the pre-exercise scenario review under IP 71114.08. However, this should not preclude submitting the scenario per 10 CFR 50.4. Electronic media is preferred, if readily available (the preferred file format is Word 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.]* Please organize the information as it is arranged below (e.g., a folder labeled "Miscellaneous"). It is not the intent that large or burdensome data be scanned for this purpose (e.g., Performance Indicator documents). This data will be inspected using original documentation. Material can be provided prior to the inspection to the NRC Region II Office (ATTN: Steven Sanchez), 245 Peachtree Center Avenue, NE, Suite 1200, Atlanta, GA 30303-1257. If there are questions regarding the documents requested, please do not hesitate to contact the lead inspector.

### **71114.01 Exercise Evaluation**

- ☐ *Current exercise package: scenario timeline, expected Drill and Exercise Performance (DEP) opportunities, exercise objectives, radiological assumptions, and scope of play and participation*
- ☐ *Completed IP 71114.08 Scenario Review Checklist, if performed*
- ☐ *Last graded and off-year exercise packages: scenario timelines, drill reports or assessments, and Final Federal Emergency Management Agency (FEMA) / Department of Homeland Security (DHS) exercise report*
- ☐ *All drill reports for the 2-year inspection period*
- ☐ *Current and immediately previous revisions of the Emergency Plan (E-Plan)*
- ☐ *Record of exercises conducted during each 8-year-cycle that documents the scenario elements demonstrated*
- ☐ *Drill, exercise, and Emergency Facility Activation procedures*
- ☐ Core damage assessment procedure
- ☐ Dose assessment procedure
- ☐ Special/emergency exposure procedure
- ☐ Potassium Iodide distribution procedure
- ☐ Assembly/accountability procedure
- ☐ Corrective Action Program (CAP) entries related to the exercises and drills for the 2-year inspection period (including those written by Corporate)

Enclosure

**71114.04 Emergency Action Level and Emergency Plan Changes**

- ❑ Governing document for 10 CFR 50.54(q) evaluation process
- ❑ 10 CFR 50.54(q) evaluator training program and qualification records
- ❑ 10 CFR 50.54(q) evaluation/screening of changed Emergency Action Level (EAL), E-Plan, and Emergency Preparedness (EP) implementing procedures (including corporate procedures); signed and dated documents
- ❑ Current and immediately previous revisions of EAL, E-Plan, and EP procedures (electronic version of current E-Plan requested about 3 weeks before inspection)
- ❑ CAP entries related to EAL and E-Plan changes since the last NRC EP inspection (including those written by Corporate)

**71151 Performance Indicator Verification**

- ❑ Governing document for the performance indicators (PIs) process
- ❑ DEP, Emergency Response Organization (ERO), and Alert and Notification System (ANS) PI data submitted since the last NRC EP inspection, documented in the report (hard copies can be provided upon arrival)
- ❑ DEP documentation and evaluations since the last NRC EP inspection
- ❑ CAP entries related to PIs, that is DEP, ERO training and participation, and ANS since the last NRC EP inspection (including those written by Corporate)

**Miscellaneous Procedures and Records**

- ❑ CAP procedure
- ❑ Safety Evaluation Report approved E-Plan and EALs
- ❑ Corporate and Departmental processes or procedures for EP staff

**Lead Inspector Contact Information:**

Steven Sanchez

404-997-4418

[steven.sanchez@nrc.gov](mailto:steven.sanchez@nrc.gov)

**LIST OF ACRONYMS**

|        |                                     |
|--------|-------------------------------------|
| ANS    | Alert and Notification System       |
| CAP    | Corrective Action Program           |
| DEP    | Drill and Exercise Performance      |
| DHS    | Department of Homeland Security     |
| EAL    | Emergency Action Level              |
| EP     | Emergency Preparedness              |
| E-Plan | Emergency Plan                      |
| ERO    | Emergency Response Organization     |
| FEMA   | Federal Emergency Management Agency |
| IPs    | Inspection Procedures               |
| PIs    | Performance Indicators              |