



Carolina Power & Light Company

RALEIGH, NORTH CAROLINA 27602

APR 15 1982

File No: 13510E

Mr. James P. O'Reilly  
Regional Administrator  
USNRC Region II  
101 Marietta Street, N. W.  
Suite 3100  
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
RESPONSE TO I. E. INSPECTION REPORT NO. 82-02

Dear Mr. O'Reilly:

Carolina Power and Light Company (CP&L) has received and reviewed the subject report and provides the following responses.

Severity Level V Violation - IER-82-02-39

Technical Specification 6.8.1 requires that written emergency procedures be established, implemented and maintained.

Contrary to the above, the licensee failed to implement Plant Emergency Procedure 4.3. This resulted in the licensee failing to meet the frequency requirements for conducting in-plant radiological drills on a semi-annual basis and communication drills on a quarterly basis. The drills were not performed during the period April 1, 1981 - February 4, 1982. This is a Severity Level V Violation.

1. Admission or Denial of the Alleged Violation

CP&L admits to the violation as stated.

2. Reason for the Alleged Violation

Through oversight, these drills and their required frequencies were not included in a plant schedule that would have ensured their implementation. Therefore, these drills were inadvertently overlooked.

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3. Corrective Steps Which Have Been Taken and Results Achieved

The Quarterly Communications Drill was successfully conducted on February 22, 1982 and the Semi-Annual Radiological Drill was successfully conducted on March 26, 1982.

4. Corrective Steps Which Have Been Taken to Avoid Further Violation

Both the Quarterly Communication Drill and the Semi-Annual Radiological Drill have been included in the Emergency Planning Schedule which will ensure these drills are performed at the required frequencies.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 26, 1982.

Item For Improvement - IER-82-02-01

A program should be established to ensure that professional development training is made available periodically to plant emergency planning personnel as a means of maintaining state-of-the-art knowledge.

Response

The Emergency Planning Technician participated in a three-day REACTS course, "Handling of Radioactive Accidents by Emergency Personnel" in March, 1982. The Emergency Planning Specialist is tentatively scheduled to attend an Emergency Planning Workshop sponsored by INPO in the Fall of 1982. Emergency Planning Personnel will continue to participate in Professional Development as deemed necessary by Plant Management.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-02

Assignments should be made by individual title or position for the following key positions in the emergency organization: (1) Accident Assessment Team Leader, (2) Damage Control Team Leader, (3) Operational Support Center Leader, (4) Evacuation Assembly Area Leader, and (5) Representative to the Forward EOC. Consideration should also be given to identification of alternate and interim personnel for these positions.

Response

The Plant Emergency Procedures (PEP) were revised on February 17, 1982 with a listing of individual titles or positions for each key position in the Emergency Organization including the five specifically identified above and their alternates.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-03

Establish an annual retraining program for all permanent licensee employees within the owner controlled area to ensure that all personnel are aware of the appropriate actions to be taken in the event of an emergency at Unit 2.

Response

Annual retraining for all permanent licensee employees allowed unescorted access to the protected area was completed in December, 1981. All permanent Contractors and Plant employees on the site completed the appropriate General Employee Training (GET) February 16, 1982, and will participate in GET Retraining annually. The retraining program for "site" personnel will be formalized by May 31, 1982.

Deficiency - IER-82-02-04

The training and retraining program for emergency response personnel, described in the Emergency Plan, Section 6.1.1 and implementing procedure PEP 4.3 had not been adequately implemented.

Response

As stated in the Confirmation of Action letter dated February 22, 1982, training of those individuals who will hold the emergency organization positions of Site Emergency Coordinator, Plant Operations Director, Emergency Repair Director, Logistics Support Director, Radiological Control Director, Administrative and Logistics Manager, Radiological Control Manager, Technical Analysis Manager, and Emergency Response Manager will be completed by June 1, 1982. Training of all remaining emergency response personnel will be completed no later than September 15, 1982.

However, it should be noted that numerous table top exercises involving various senerios were conducted prior to the State wide emergency drill conducted in March of 1981 and numerous additional table top and team training exercises were conducted prior to the annual plant emergency drill held in December of 1981.

Item For Improvement - IER-82-02-05

Resolve the inconsistency between the Plan and the actual placement of the Load Dispatcher radio in the CR.

Response

The Emergency Response Plan was revised to describe the location of the Load Dispatcher radio in the Unit 1 Control Room.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-06

Procedures for the activation and operation of the TSC and other Emergency Response Facilities should be provided.

Response

The Plant Emergency Procedure was revised on February 17, 1982 to include a description of the activation, operation and functions of the TSC and the EOF.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-07

The TSC should be provided with the same radiological habitability as the CR under accident conditions.

Response

CP&L is presently in discussion with the office of NRR to resolve the TSC acceptance criteria.

A review to determine the radiological habitability requirements for the TSC is currently underway and will be completed subsequent to resolution of the acceptance criteria.

Item For Improvement - IER-82-02-08

Procedures should provide for evacuation of OCS personnel in the event of a large radioactive release.

Response

The Emergency Response Plan was revised on February 17, 1982 to include the statement: "In the event of a site and/or OCS evacuation, an area will be designated by the Site Emergency Coordinator via the plant PA system."

This improvement item is considered resolved.

Item For Improvement - IER-82-02-09

Procedures for the activation and operation of the EOF should be provided.

Response

The Plant Emergency Procedure was revised on March 26, 1982 to include the Activation and operation of the EOF.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-10

Provide ventilation protection for the EOF as indicated in Table 2, NUREG-0654.

Response

Ventilation protection will be considered in proposals for a EOF/TSC building.

Item for Improvement - IER-82-02-11

Provide detectors to distinguish the presence or absence of radioiodines at concentrations as low as  $10^{-7}$  uCi/cc.

Response

The appropriate air sampling equipment will be provided including silver zeolite sampling cartridges and associated adaptors (where necessary), and the appropriate survey meter for the detection of radioiodines in the EOF emergency kit. Full compliance is expected by September 1, 1982, pending procurement of equipment.

Item For Improvement - IER-82-02-12

Provide a First-Aid Kit and clock at the EOF.

Response

A clock has been installed in the EOF. A first-aid kit will be provided in the EOF by July 1, 1982.

Item For Improvement - IER-82-02-13

Communication equipment should be provided in the first-aid room.

Response

A plant modification for the installation of a public address unit in the first-aid room is being developed. This public address system should be installed by October 1, 1982.

Item For Improvement - IER-82-02-14

A procedure should be available for the inventory and check of the medical supplies and equipment.

Response

Administrative Instruction AI-12 was revised on March 26, 1982 to include a list of first-aid supplies to be included in a monthly inventory.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-15

Prepositioned decontamination kits should be established at locations where they might be required and add inventory and inspection requirements to the emergency kit procedure (PT-43).

Response

Decontamination kits will be established and prepositioned in plant emergency kits and inventory and inspection requirements will be added to the emergency kit procedure by September 1, 1982.

Item For Improvement - IER-82-02-16

Determine as to whether a PA system is available in the Center Theater and, if necessary, evaluate the need to install such a system or alternate approaches to installing a PA system.

Response

A PA system is available in the Center Theater.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-17

Evaluate the requirements for providing expanded telephone service to the alternate media center (Center Theater).

Response

A review to determine the equipment needs of the Alternate News Media Center is currently underway and will be completed by June 30, 1982.

Item For Improvement - IER-82-02-18

Essential equipment in the kits should be listed on the kit inventories.

Response

HBR has identified all the essential emergency kit items in the procedure PT-43.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-19

Procedures should specify the type of emergency communications equipment for each applicable emergency kit.

Response

The type of communications equipment in each emergency kit will be specified in PT-43. Expected completion date is May 1, 1982.

Item For Improvement - IER-82-02-20

Ensure emergency alarms are noticeable in high noise area.

Response

A preventive maintenance procedure is being developed to verify the operability of the plants public address system which will include verifying the audio in high noise areas. This procedure should be implemented by July 1, 1982.

Item For Improvement - IER-82-02-21

Provide a procedure describing stockage, issuance, and inventory of the reserve emergency supplies and equipment.

Response

If necessary, reserve emergency supplies and equipment are available from the off site locations mentioned in the Appraisal. A CP&L procedure describing stocking, issuance and inventory of these off site reserve emergency supplies is not deemed necessary.

Current controls are considered adequate.

This improvement item is considered resolved.

Deficiency - IER-82-02-22

Implementing procedures do not provide for notification of State and/or local governmental agencies within 15 minutes of the declaration of an alert or higher class of emergency as required.

Response

The Plant Emergency Procedures were revised on March 1, 1982 to provide for the notification of the responsible State government agency within 60 minutes after the classification of an unusual event, and 15 minutes after the classification of an Alert, Site Emergency and General Emergency. These notification times were agreed to with the State of South Carolina.

This deficiency is considered resolved.

Item for Improvement - IER-82-02-23

Participate with State and local officials in evaluating installation of dedicated phone systems for use in emergencies and assist local/state agencies in development of technically accurate EBS message.

Response

On February 10, 1982, CP&L participated with State and local officials in evaluating a dedicated phone system.

This improvement is considered resolved.

Item For Improvement - IER-82-02-24

Develop a procedure and train operators in the use of the Robinson Emergency Radio System which connects the TSC with the State of South Carolina EPD.

Response

An operating procedure and the Instruction Manual has been located at the Robinson Emergency Radio. The designated operators will be trained in the use of this radio by July 31, 1982.

Item For Improvement - IER-82-02-25

Data sheets should be changed to make provision for recording:

- Names of individuals performing surveys,
- Type and serial number of instruments used in survey,
- Air sampler flow rates, and
- Background radiation at time of each count.

Response

Data sheets for off site radiological surveys will be modified to provide for recording the above information.

The expected completion date for this item is September 1, 1982.

Item For Improvement - IER-82-02-26

Provision should be made for disposition of data sheets after monitoring team has completed job.

Response

Procedures will be implemented to require that appropriate data sheets be footnoted to indicate the proper destination of each form. Each data sheet will ultimately be filed in the plant vault.

Procedure will be implemented by September 1, 1982.

Item For Improvement - IER-82-02-27

PEP-3.3.2 should be changed to either provide detailed instructions for survey in this area or should be cross-referenced to equivalent instructions in PEP-3.3.

Response

Survey data sheets in PEP-3.3.1 will be added to PEP-3.3.2 for use in recording data from onsite (out of plant) surveys. PEP-3.3.2 will be cross-referenced to PEP-3.3.1 to provide detailed survey instructions. Expected completion date is September 1, 1982.

Item For Improvement - IER-82-02-28

Changes to PEP-3.3.2 should include:

- Instruction for labeling samples.
- Instructions for disposition of the data sheet generated by the survey team.
- Specify primary and backup communication for onsite (out-of-plant) survey team.

Response

PEP-3.3.2 will be revised to include the following:

- 1) Instructions for the labeling of all samples.
- 2) Footnote the appropriate data sheets to indicate the proper destination of each form.
- 3) The primary source of communication on the plant site shall be the plant public address system and the telephone system. The Plant Protection and Decontamination Team Leader and the Plant Monitoring Team Leader may issue two-way radios if available and when and where deemed necessary. This will be identified in PEP-3.3.2.

PEP-3.3.2 will be revised by October 1, 1982.

Item For Improvement - IER-82-02-29

PEP-3.3.1 should be amended to provide:

- Labeling instructions for samples.
- Instructions for disposition of original data sheets generated by the survey team.

Response

PEP-3.3.1 will be revised to reference appropriate plant procedures to provide labeling instructions for samples. Data sheets used to record survey data in accordance with PEP-3.3.1 will be footnoted giving instructions for proper disposition of sheets. Expected completion date is September 1, 1982.

Item For Improvement - IER-82-02-30

Primary and backup communications for the in-plant survey teams should be specified.

Response

A plant PA system and telephone system are available throughout the plant. Response to Item for Improvement IER-82-02-28 also addresses this item.

Item For Improvement - IER-82-02-31

Provide for informing personnel of recommended evacuation routes from plant areas in emergency conditions.

Response

The Plant Emergency Procedure PEP-2 was revised on February 17, 1982 to include: "Sound Local Evacuation Alarm for 15 seconds and Announce 'Alert condition caused by (state plant conditions and any specific safety instructions).' If the specific safety instructions include the evacuation of personnel from a plant location, recommend evacuation routes from plant area to the assembly area."

This improvement item is considered resolved.

Item For Improvement - IER-82-02-32

Specify the alternate assembly areas for site evacuation in PEP-3.8.1.

Response

The Plant Emergency Procedure PEP-3 was revised on February 17, 1982 to include: An alternate assembly area for a site evacuation will be specified by the Site Emergency Coordinator dependent upon the plume exposure pathway.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-33

Provide for recording decontamination methods used for skin and record results of decontamination attempts.

Response

Appropriate data sheets will be developed or an existing sheet will be modified to provide for recording decontamination methods used for skin and results achieved by October 1, 1982.

Item For Improvement - IER-02-34

Provide for handling and disposition of form HP-28-1 or equivalent when used under emergency conditions.

Response

Instructions for proper handling and disposition of Form HP-28-1 or equivalent when used under emergency conditions will be developed, by September 1, 1982.

Item For Improvement - IER-82-02-35

Add provisions to appropriate PEP to include instructions for recording identification and results of monitoring and decontamination on vehicles.

Response

Provisions will be added to appropriate PEP to include instructions for recording identification and results of monitoring and decontamination of vehicles. The PEPs will be revised by November 1, 1982.

Item For Improvement - IER-82-02-36

Expand corporate procedures to describe how initial information will be disseminated to the news media prior to establishments of the news media center.

Response

A description of how initial information will be disseminated to the news media prior to establishment of the News Media Center is contained in Corporate Communications Implementation Procedure 5.3.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-37

Identify the official point of contact for information to be used by the corporate spokesman.

Response

The corporate spokesman's point of contact for official information is identified in CEP Implementation Procedure 14.2.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-38

Specify how the general public will be notified of the rumor control telephone number.

Response

Corporate Communications Implementation Procedure 4.2 specifies how the public will be notified of the rumor control telephone number.

This improvement item is considered resolved.

Violation - IER-82-02-39

The failure to follow procedure PEP-4.3 which specifies the frequency requirements for in-plant radiation protection drills and communication drills is an apparent violation of Technical Specification 6.8.1.

Response

This violation is addressed in detail on page 1.

Item For Improvement - IER-82-02-40

Incorporate the individual items of the CP&L critiques of exercises and drills into the tickler and tracking system of Procedure AI-12.

Response

These items were entered on the Regulatory Action Item List (RAIL) on March 2, 1982.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-41

Preplanned messages similar to those in PEP-2.2 to 2.5 should be used in communication drills.

Response

Plant Emergency Procedure PEP-2 was revised on February 17, 1982 to include a preplanned message.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-42

Clarify the frequencies to be used for the communication drills to eliminate the differences in the requirements as stated in the Plan section 6.1.2.1 and PEP-4.3, item 3.2.1.1.

Response

The Emergency Response Plan Section 6 and the Plant Emergency Procedure PEP-4 were both revised on February 17, 1982 to eliminate the difference in communication drill requirements.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-43

Incorporate the news media coverage of major exercises into the drills and exercise section of the Plan and PEP-4.3.

Response

The news media are involved in full scale drills. Consideration will be given to incorporating news participation in smaller drills as appropriate. Emergency information brochures were distributed in March, 1982.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-44

Distribute emergency information brochures at locations used by the transient population.

Response

Alternate means of notifying transient population will be reviewed by June 30, 1982.

Item For Improvement - IER-82-02-45

Revise public information brochures to contain information pertaining to the siren system and subsequent actions.

Response

The revised public information brochure containing information pertaining to the siren systems was distributed in March, 1982.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-46

A documented commitment should be made to brief the news media annually on emergency preparedness matters.

Response

CEP-5.9.9 documents the commitment to hold annual briefing of the news media on emergency preparedness matters.

This improvement item is considered resolved.

Item For Improvement - IER-82-02-47

Provide training on initial dose projection procedures and review format of dose projection procedures to facilitate use.

Response

A review of the initial dose projection procedure has been completed. This review has resulted in a proposed revision to the procedure that will facilitate its use by the operators. This revision should be implemented by September 15, 1982.

If you have any questions concerning these items, please contact me.

Very truly yours,



B. J. Furr  
Vice President  
Nuclear Operations Department

CW/bss