

CP&L

Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

Company Correspondence

FEB 17 1984

Robinson File No: 13510E

Serial: RSEP/84-127

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NRC INSPECTION REPORT IER-83-35

Dear Mr. O'Reilly:

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

SEVERITY LEVEL IV VIOLATION (IER 83-35-01-SL4)

10 CFR 50.54(Q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). Section (b) (10) of 10 CFR 50.47 requires that the licensee's emergency plans shall include information to demonstrate compliance with the following:

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

The Federal guidance on the protective actions to be recommended to offsite officials for general emergencies is addressed in Appendix 1 of NUREG 0654/FEMA-REP-1, Rev. 1, entitled "Criteria for Preparation and Evaluation of Radiological Emergency Preparedness in Support of Nuclear Power Plants." This guidance is clarified by IE Information Notice No. 83-28: "Criteria for Protective Action Recommendations for General Emergencies."

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Contrary to the above, the licensee has failed to incorporate the above guidance in their plan or implementing procedures, in that there is no mechanism or requirement for determining directly from containment and core status what offsite protective action recommendations will be made, other than sheltering in the plume EPZ.

RESPONSE

1. Admission or Denial of the Alleged Violation

Carolina Power and Light Company acknowledges the alleged violation.

2. Reason For The Violation

Emergency procedure PEP-105, Emergency Control - General Emergency, was revised in September, 1983, as an initial step in incorporating the concerns of Notice IEN-83-28 relative to the protective action recommendations of NUREG-0654. This revision included the recommendation for the offsite agency to shelter persons within a 2-mile radius and 5-miles downwind as the first step after declaring a General Emergency.

Recommendations to offsite agencies to evaluate persons after the initial sheltering within a 2-mile radius and 5-miles downwind are determined by offsite dose projections which are based on the status of core and containment conditions. However, Notice IEN-83-28 stated that protective action recommendations, after the initial sheltering of a 2-mile radius and 5-miles downwind, should be based directly on core and containment conditions. CP&L was in the process of establishing the direct relationship between protective action recommendation and the core and containment condition at the time of the inspection.

3. Corrective Steps Which Have Been Taken and Results Achieved

PEP-105 has been revised to clarify that the first step after declaring a General Emergency is to recommend to offsite agencies to either shelter within a 2-mile radius and 5-miles downwind, or when substantial core damage is in progress or is projected, to consider recommending evacuation of a 2-mile radius and 5-miles downwind.

4. Corrective Steps Which Will Be Taken to Avoid Further Violation

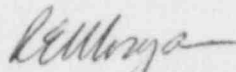
PEP-105 will be revised to include a flowchart or table which will implement all the recommendations of IEN-83-28. Until precise values are established, conservative values will be used for core and containment conditions.

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5. Date When Full Compliance Will Be Achieved

PEP-105 will be revised by March 16, 1984, to incorporate the recommendations of IE Notice 83-28. Appropriate CP&L emergency response personnel will be trained on the procedure revision and off-site agencies will be notified of the procedure revision by April 12, 1984. Full compliance will therefore be achieved by April 12, 1984.

Very truly yours,



R. E. Mergan
General Manager
H. B. Robinson S. E. Plant

CLW/tld