Progress Energy

File Point No. 12570-B

June 8, 2011

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Comments on DRAFT Dam Assessment Report
H.B. Robinson Steam Electric Plant
Progress Energy Carolinas, Inc.
Hartsville, South Carolina

Dear Mr. Hoffman:

Thank you for the opportunity to review and provide comments on the subject report. The following comments are offered for consideration and inclusion in the final report.

Title Page

The company name should read ***Progress Energy Carolinas, Inc.***

Introduction page ii

Second paragraph, fifth line, 1.2.~~5~~ 3

Third paragraph, last line: unit~~y~~

Purpose and Scope

First Paragraph, last line "(For Classification, see pp. 3-8 of the **FEMA** 2004 Federal Guidelines for Dam Safety.)

1.0 Conclusions and Recommendations

Sections 1.1.4 and 1.2.2
Comment – Progress Energy will review as built drawings and verify pipe size as it exists in the field. Any necessary changes will be made to the as built drawings.

Progress Energy Carolinas, Inc.
Robinson Fossil Plant
3512 Lakeside Dr.
Hartsville, SC 29550

Section 1.1.5 – second line ~~filed~~ field

Section 1.2.1
Comment - The plant has a plan to maintain the flood storage capacity of the pond. The plan involves dry fly ash handling and stacking of bottom ash as necessary.

Section 1.2.3
Item 1.2.3 f. This comment pertains to a structure at a location that is believed to be unrelated to the CCR unit structure. It is requested this comment be removed.

Section 1.3
Two of the names of participants from Progress Energy are incorrectly spelled: Bill Foster, should be changed to Bill Forster and Willie Gilbert should be changed to Wellie Gilbert.

2.0 Description of the CCR Management Units

Section 2.1
The plant should be referred to as the H. B. Robinson Steam Electric Plant, not the H. B. Robinson Power Station.

Section 2.3
Instead of stating the ash pond dike is not regulated for dam safety by a federal or state agency, please state the dam has not been recently assessed for dam safety by a federal or state agency.

4.0 Summary of History of Construction and Operation

Section 4.1.2
Comment – Progress Energy will review as built drawings and verify pipe size as it exists in the field. Any necessary changes will be made to the as built drawings.

Section 4.2.3
The second sentence of the paragraph states that no fly ash is discharged to the pond. That statement is generally correct. However, for brief periods of time the dry ash handling system can be in a maintenance outage; in which case fly ash is sluiced to the pond.

8.0 Adequacy of Maintenance and Methods of Operation

Section 8.2
This section states we have no written maintenance plan, however it should be pointed out that we do have a written inspection procedure, which serves to perform the function of a maintenance plan.

We certainly appreciate your attention to this matter. If there are any regulatory questions or requests for additional information, please contact Steve Cahoon at 919-546-7457; steve.cahoon@pgnmail.com. For any questions concerning technical aspects of the plan, please contact Rob Miller at (919) 881-3849.

Sincerely,

Ken Kennedy
Plant Manager

NOTE

Subject: EPA Comments on Progress Energy Carolinas Inc, H. B. Robinson Power Station, Hartsville, SC
Round 9 Draft Assessment Report

To: File

Date: September 14, 2011

1. On p. 1-2, section 1.1.5, at the end of the paragraph, replace "(see Subsection 1.2.5)" with "(see Subsection 1.2.3)."

2. On p. 9-1, section 9.2, insert "of" after "locations" in the following statement: "an accompanying plan in Doc 09 shows the locations the instruments."

3. Appendix A, Doc 03: MACTEC 2010 5-Year Inspection Report, p. 15, section 3.1.4 Construction, first paragraph: documentation says there is a compacted clay liner/core. The checklist says there is no liner. Please reconcile.

M E M O R A N D U M

TO: Jana Englander

FROM: Jerry Strauss

cc:

Date: November 28, 2011

SUBJECT: Progress Energy Carolinas, H.B. Robinson PLant

EPA Comments: the comment concerning the liner. The MACTEC report was addressing the cooling water lake, not the ash pond. Thus there was no discrepancy.

UTILITY COMMENTS:

- Essentially editorial
- Text reflects the fact that PEC will investigate the pipe size disparity in their documents and correct the "as-built" drawings.
- Changed text slightly in Sections 4.2.3 and 8.2 to better reflect utility's procedures.