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June 28, 1982

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Docket No. 50-261

Mr. J. A. Jones, Vice Chairman
Carolina Power and Light Company
336 Fayetteville Street
Raleigh, North Carolina 27602

Dear Mr. Jones:

The Commission has issued the enclosed Amendment No. 70 to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2. The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated July 10, 1981.

The amendment consists of revisions to the Appendix A Administrative Controls Section of the Technical Specifications to modify corporate and plant organizational structures and modifications to the Plant Nuclear Safety Committee (PNSC).

We have made several changes in the Technical Specifications you proposed. These changes have been discussed with, and agreed to, by your staff.

Copies of the Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

Original signed by:

Glode Requa, Project Manager
Operating Reactors Branch No. 1
Division of Licensing

Enclosures:

1. Amendment No. 70 to DPR-23
2. Safety Evaluation
3. Notice of Issuance

cc w/enclosures:
See next page

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FR NOTICE
- AMENDMENT

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SURNAME	CParrish	GRequa/rs	SVarga	T. Barnhart	M. JARMAN	
DATE	6/25/82	6/25/82	6/25/82	6/25/82	6/25/82	

Mr. J. A. Jones
Carolina Power and Light Company

cc: G. F. Trowbridge, Esquire
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James P. O'Reilly
Regional Administrator - Region II
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Atlanta, Georgia 30303

Hartsville Memorial Library
Home and Fifth Avenues
Hartsville, South Carolina 29550

Mr. McCuen Morrell, Chairman
Darlington County Board of Supervisors
County Courthouse
Darlington, South Carolina 29535

State Clearinghouse
Division of Policy Development
116 West Jones Street
Raleigh, North Carolina 27603

Attorney General
Department of Justice
Justice Building
Raleigh, North Carolina 27602

U. S. Nuclear Regulatory Commission
Resident Inspector's Office
H. B. Robinson Steam Electric Plant
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CAROLINA POWER AND LIGHT COMPANY

DOCKET NO. 50-261

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 70
License No. DPR-23

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power and Light Company (the licensee) dated July 10, 1981, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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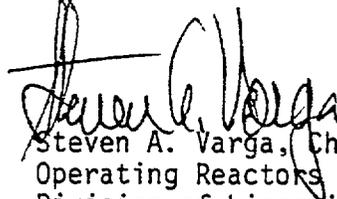
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-23 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 70, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective 45 days from the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION -



Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 28, 1982

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 70 TO FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Revise Appendix A as follows:

Remove Pages

6.2-1 thru 6.2-4
6.3-1
6.4-1
6.5-1 thru 6.5-12
6.6-1
6.7-1
6.8-1
6.9-1 thru 6.9-8
6.10-2

Insert Pages

6.2-1 thru 6.2-3
6.3-1
6.4-1
6.5-1 thru 6.5-16
6.6-1
6.7-1
6.8-1
6.9-1 thru 6.9-9
6.10-2

6.2 ORGANIZATION

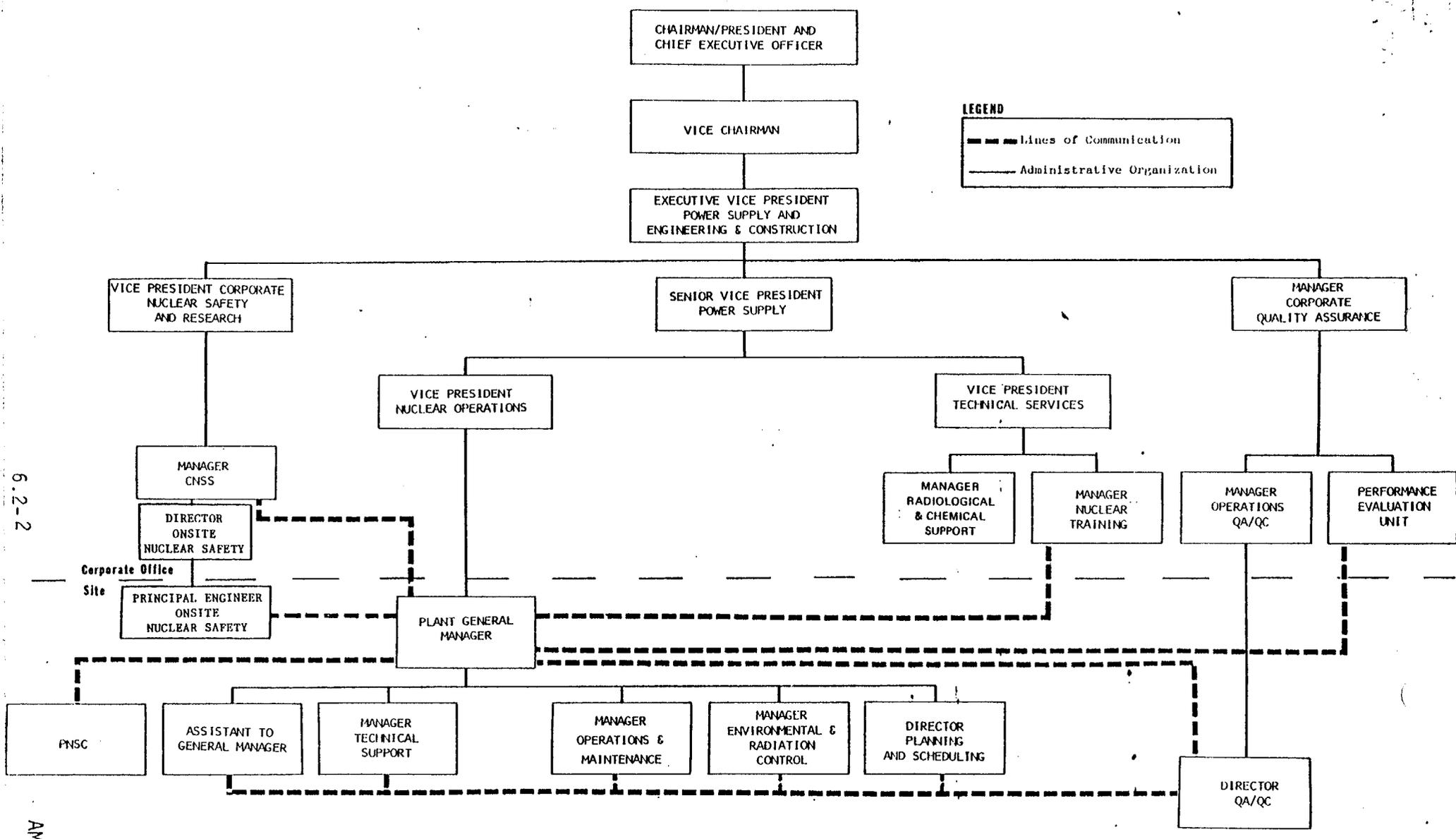
Offsite

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

Facility Staff

6.2.2 The facility organization shall be as shown on Figure 6.2-2 and:

- a. The shift complement shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, three control operators each holding at least a Reactor Operator's license, one additional shift member, and one Shift Engineer (shift technical advisor).
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown, and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A Plant Fire Brigade of at least 5 members shall be maintained on site at all times. This excludes three members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.

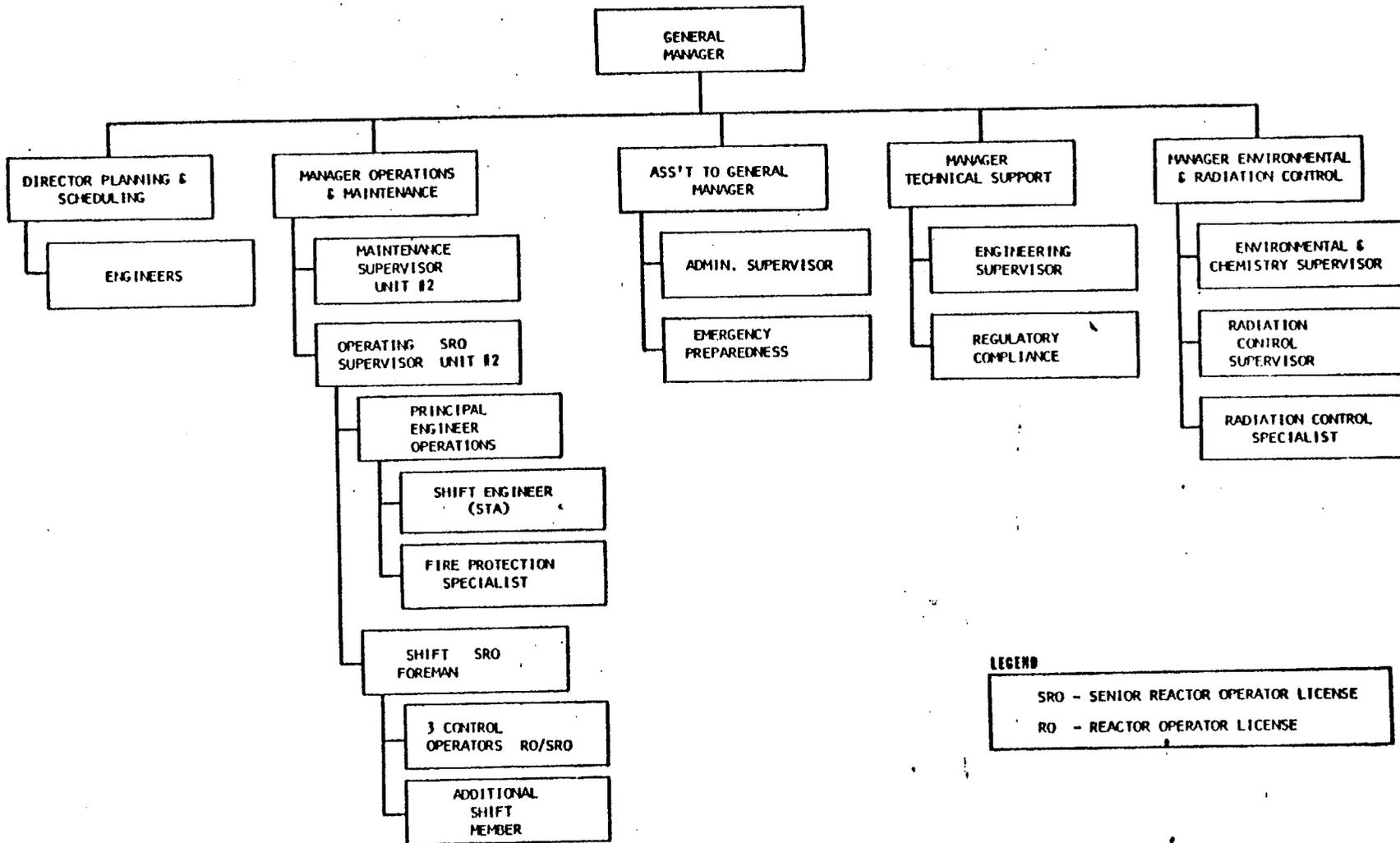


OPERATION & MAINTENANCE - ROBINSON

Fig. 6.2-1

6.2-2

AMENDMENT NO. 70



LEGEND
 SRO - SENIOR REACTOR OPERATOR LICENSE
 RO - REACTOR OPERATOR LICENSE

CONDUCT OF OPERATIONS CHART
 H. B. ROBINSON

Fig. 0.2-2

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed ANSI N18.1-1971 with regard to the minimum qualifications for comparable positions.

6.3.2 The Manager - Environmental and Radiation Control shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975. The Guide says that he shall have a bachelor's degree or equivalent in a science or engineering subject. Equivalent in this case is defined as follows:

- (a) 4 years of formal schooling in science or engineering,
- (b) 4 years of applied radiation protection experience at a nuclear facility,
- (c) 4 years of operational or technical experience/training in nuclear power, or
- (d) Any combination of the above totaling 4 years.

This requirement is in addition to the requirement for five years of professional experience in applied radiation protection.

6.3.3 The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.5 REVIEW AND AUDIT

6.5.1 The license organization's review and approval process shall assure that the nuclear safety of the facility is maintained.

6.5.1.1 Procedures, Tests, and Experiments

6.5.1.1.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.
- d. Security Plan implementing procedures.
- e. Emergency Plan implementing procedures.
- f. Fire Protection Program implementing.

6.5.1.1.2 A safety analysis shall be prepared for all procedures, tests, and experiments covering the activities identified in 6.5.1.1.1 and procedures that affect nuclear safety. The analysis shall include a written determination of whether or not the procedure, test, or experiment is a change in the facility as described in the FSAR, involves a change to the Technical Specification, or constitutes an unreviewed safety question as defined in 10CFR50.59(a)(2). This analysis constitutes a first party safety review and may be accomplished by the individual who prepared the document.

6.5.1.1.3 Prior to approval, a second safety review shall be performed on all procedures, tests, or experiments that affect nuclear safety. This review shall be performed by an individual other than the individual who was the original preparer.

6.5.1.1.4 Following the two-party review, procedures, tests, and experiments and permanent changes thereto (other than editorial or typographical) which have been determined neither to involve an unreviewed safety question as defined in 10CFR50.59(a)(2), nor a change to the Technical Specifications, shall be approved prior to implementation by one of the following:

- a. Plant General Manager, or designated alternate, or
- b. The Manager of the functional area affected by the procedures tests, and experiments and permanent changes thereto as previously designated by the Plant General Manager.

The individual approving the procedure, test, or experiment or change thereto shall be other than those who performed the required reviews.

The Plant General Manager or other designated manager approving the review activities of the two-party review shall assure that the reviewers collectively possess the background and qualifications in all of the disciplines necessary and important to the specific review. To assure that the individuals selected for the two-party review are qualified and have the background necessary, the Plant General Manager shall approve and maintain a list of qualified persons. Included in this list will be individuals in addition to the first and second party reviewer whose expertise may be necessary during the review to assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review.

The list will include the disciplines for which each person is qualified.

6.5.1.1.5 Temporary changes to procedures, tests, or experiments may be approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator License if such change does not change the intent of the original procedure, test, or experiment. Temporary changes shall be documented and, within 21 days of receiving temporary approval, be reviewed in accordance with specification 6.5.1.1.2, 6.5.1.1.3 and 6.5.1.1.4 and incorporated as a permanent change or deleted.

6.5.1.1.6 Those procedures, tests, or experiments and changes thereto that constitute an unreviewed safety question, or involve a change to Technical Specifications shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such procedures, tests, or experiments and changes shall be reviewed by the Corporate Nuclear Safety Section prior to implementation.

6.5.1.1.7 Procedures, tests, or experiments, which constitute a change to the FSAR shall also be reviewed by the Corporate Nuclear Safety Section. These reviews may be conducted after plant Management approval, and implementation may proceed prior to completion of review as provided for by 10CFR50.59(a)(1).

6.5.1.2 Modifications

6.5.1.2.1 A safety analysis shall be prepared for all modifications that affect nuclear safety. The analysis shall include a written determination of whether or not the modification is a change in the facility as described in the FSAR, involves a change to the Technical Specification, or constitutes an unreviewed safety question as defined in 10CFR50.59(a)(2).

This analysis constitutes a first party safety review and may be accomplished by the individual who prepared the modification.

6.5.1.2.2 Prior to approval, a second safety review shall be performed on all modifications that affect nuclear safety. This review shall be performed by a qualified individual other than the individual who was the original preparer.

6.5.1.2.3 Following the two party review, modifications that have been determined neither to involve an unreviewed safety question as defined in 10CFR50.59(a)(2) nor a change to the Technical Specifications shall be approved, prior to implementation, by one of the following:

- a. Plant General Manager, or designated alternate, or
- b. The Manager of Technical Support.

The individual approving these modifications shall be other than those who performed the required reviews.

The Plant General Manager or other designated manager approving the review activities of the two-party review shall assure that the reviewers collectively possess the background and qualifications in all of the disciplines necessary and important to the specific review. To assure that the individuals selected for the two-party review are qualified and have the background necessary, the Plant General Manager shall approve and maintain a list of qualified persons. Included in this list will be individuals in addition to the first and second party reviewers whose expertise may be necessary during the review to assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review. The list will include the disciplines for which each person is qualified.

6.5.1.2.4 Modifications that are determined to either constitute an unreviewed safety question, as defined in 10CFR50.59(a)(2), or a change to the Technical Specifications, shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such modifications shall be approved by the Corporate Nuclear Safety Section prior to implementation.

6.5.1.2.5 Modifications which constitute changes to the facility as described in the FSAR shall also be reviewed by the Corporate Nuclear Safety Section. This review may be conducted after plant Management approval, and implementation may proceed prior to completion of review.

6.5.1.3 Technical Specifications and License Changes

6.5.1.3.1 Each proposed Technical Specification or Operating License change shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval.

6.5.1.4 Review of Technical Specification Violations

6.5.1.4.1 All violations of Technical Specifications shall be investigated and a report prepared that evaluates the occurrence and that provides recommendations to prevent recurrence. Such reports shall be reviewed by the PNSC and approved by the Plant General Manager or his designee and submitted to the Vice President - Nuclear Operations and to the Manager - Corporate Nuclear Safety.

6.5.1.5 Nuclear Safety Review Qualification

6.5.1.5.1 Individuals shall be designated by the Plant General Manager for the safety reviews of Specifications 6.5.1.1.2, 6.5.1.1.3, 6.5.1.2.1, and 6.5.1.2.2. These reviewers shall have a Bachelor of

Science in engineering or related field or equivalent and two (2) years related experience.

6.5.1.6 Plant Nuclear Safety Committee (PNSC)

6.5.1.6.1 a. As an effective means for the regular overview, evaluation, and maintenance of plant operational safety, a Plant Nuclear Safety Committee (PNSC) is established.

b. The committee shall function through the utilization of subcommittees, audits, investigations, reports, and/or performance of reviews as a group.

6.5.1.6.2 The PNSC shall be composed of the following:

Chairman - General Manager or designated alternate

Member - Manager - Operations and Maintenance or designated alternate

Member - Manager - Technical Support or designated alternate

Member - Assistant to General Manager

Member - Manager - Environmental & Radiation Control or designated alternate

Member - Director - QA/QC or designated alternate

6.5.1.6.3 Alternates shall be appointed in writing by the General Manager to serve on a temporary basis. Alternates shall, as a minimum, meet the qualifications specified for professional-technical personnel in Section 4.4 of ANSI N18.1-1971.

6.5.1.6.4 The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate.

6.5.1.6.5 A quorum of the PNSC shall consist of the Chairman, and three members, of which two may be alternates.

6.5.1.6.6 The PNSC activities shall include the following:

a. Perform an overview of Specifications 6.5.1.1, and 6.5.1.2 to assure that processes are effectively maintained.

b. Performance of special reviews, investigations, and reports thereon requested by the Manager - Corporate Nuclear Safety.

c. Annual review of the Security Plan and Emergency Plan.

d. Perform reviews of Specifications 6.5.1.1.6, 6.5.1.2.4, 6.5.1.3.1, and 6.5.1.4.1.

e. Perform review of all events requiring 24 hour notification to the NRC.

f. Review of facility operations to detect potential nuclear safety hazards.

6.5.1.6.7 In the event of disagreement between the recommendations of the Plant Nuclear Safety Committee and the actions contemplated by the General Manager, the course determined by the General Manger to be more conservative will be followed. The Vice President - Nuclear Operations and the Manager - Corporate Nuclear Safety will be notified within 24 hours of the disagreement and subsequent actions.

6.5.1.6.8 The PNSC shall maintain written minutes of each meeting that, at a minimum, document the results of all PNSC activities performed under the provisions of these Technical Specifications; and copies shall be provided to the Vice President - Nuclear Operations, and to the Manager - Corporate Nuclear Safety.

6.5.2

Corporate Nuclear Safety Section - Independent Review

The Corporate Nuclear Safety Section of the Corporate Nuclear Safety & Research Department shall provide independent review of significant plant changes, tests, and procedures; verify that reportable occurrences are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer. Specific review subjects are defined in Specification 6.5.2.1.d.

6.5.2.1

The Manager - Corporate Nuclear Safety, under the Vice President - Corporate Nuclear Safety & Research, is charged with the overall responsibility for administering the independent review function as follows:

- a. Approves selection of the individuals to conduct safety reviews under Specification 6.5.2.
- b. Has access to plant records and operating personnel in performing independent reviews.
- c. Prepares and retains written records of reviews.
- d. Assures independent reviews are conducted on the following subjects:
 - (1) Written safety evaluations of changes in the facility as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report, and tests or experiments not described in the Safety Analysis Report that are completed without prior NRC approval under the provisions of 10CFR50.59(a)(1). This review is to verify that such changes, tests, or

experiments did not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10CFR50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.

- (2) Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or an unreviewed safety question pursuant to 10CFR50.59(c). Matters of this kind shall be referred to the Corporate Nuclear Safety Section by the Plant General Manager or by other functional organizational units within Carolina Power & Light Company prior to implementation.
- (3) Proposed changes to the Technical Specifications or this operating license, prior to implementation.
- (4) Violations, deviations, and reportable events that require reporting pursuant to Specification 6.9.2.a.
 - a. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements, or internal procedures or instructions having safety significance; and
 - b. Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems or components.

Review of events covered under this paragraph shall include the results of any investigations made and the

recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- (5) Any other matter involving safe operation of the nuclear power plant that the Manager - Corporate Nuclear Safety Section, deems appropriate for consideration of which is referred to the Manager - Corporate Nuclear Safety Section, by the on-site operating organization or by other functional organizations units within Carolina Power & Light Company.
- (6) Reports and minutes of the PNSC.

6.5.2.2 Results of Corporate Nuclear Safety reviews, including recommendations and concerns, shall be documented.

- a. Copies of documented reviews shall be retained in the CNS files.
- b. Recommendations and concerns shall be submitted to the plant General Manager and Vice President - Nuclear Operations, within 14 days of determination.
- c. A summation of Corporate Nuclear Safety recommendations and concerns shall be submitted to the Chairman/President; Vice Chairman; Executive Vice President - Power Supply and Engineering & Construction; Senior Vice President - Power Supply; Vice President - Nuclear Operations; Vice President - Nuclear Safety & Research; plant General Manager; and others, as appropriate on at least a bimonthly frequency.
- d. The Corporate Nuclear Safety Review program shall be conducted in accordance with written, approved procedures.

6.5.2.3 Personnel

a. Personnel assigned responsibility for independent reviews shall be specified in technical disciplines and shall collectively have the experience and competence required to review problems in the following areas:

- (1) Nuclear power plant operations
- (2) Nuclear engineering
- (3) Chemistry and radiochemistry
- (4) Metallurgy
- (5) Instrumentation and control
- (6) Radiological safety
- (7) Mechanical and electrical engineering
- (8) Administrative controls
- (9) Seismic and environmental
- (10) Quality assurance practices

b. The following minimum experience requirements shall be established for those persons involved in the independent safety review program:

- (1) Manager of CNSS - Bachelor of Science in engineering or related field and ten (10) years' related experience, including five (5) years' involvement with operation and/or design of nuclear power plants.
- (2) Reviewers - Bachelor of Science in engineering or related field or equivalent and five (5) years' related experience.

c. An individual may possess competence in more than one specialty area. If sufficient expertise is not available

within the Corporate Nuclear Safety Section, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

- d. At least three persons, qualified as discussed in Specification 6.5.2.3.b, shall review each item submitted under the requirements of Section 6.5.2.1.d.
- e. Independent safety reviews shall be performed by personnel not directly involved with the activity or responsible for the activity.

6.5.3 Performance Evaluation Unit - Audit

6.5.3.1 The Performance Evaluation Unit of the Corporate Quality Assurance Department shall perform audits of plant activities. Specific audit subjects are defined in Specification 6.5.3.2.d.

6.5.3.2 The Principal QA Specialist - Performance Evaluation Unit under the Manager Corporate Quality Assurance is charged with the overall responsibility for administering the quality assurance audit programs as follows:

a. Approves selection of the individual(s) to conduct quality assurance audits.

b. Has access to the plant operating records and operating personnel in performing the quality assurance audits.

c. Prepares and retains written records of audits.

d. Assures quality assurance audits are conducted on the following subjects:

- (1) The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- (2) The training and qualifications of the entire facility staff at least once per 12 months.
- (3) The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per 6 months.

- (4) The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix B, 10CFR50, at least once per 24 months.
- (5) The Emergency Plan and implementing procedures at least once per 24 months.
- (6) The Security Plan and implementing procedures at least once per 24 months.
- (7) The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- (8) Any other area of facility operation considered appropriate by the Corporate Quality Assurance Performance Evaluation Unit; the Executive Vice President - Power Supply and Engineering & Construction; or the Senior Vice President - Power Supply.

e. Distribute reports and other records to appropriate managers.

- 6.5.3.3 a. Audit personnel shall be independent of the area audited. Selection for auditing assignments is based on experience or training that establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting auditing personnel, consideration shall be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.

b. Qualified outside consultants or other individuals independent from those personnel directly involved in plant operation shall be used to augment the audit teams when necessary. Individuals performing the audits may be members of the audited organization; however, they shall not audit activities for which they have immediate responsibility, and while performing the audit, they shall not report to a management representative who has immediate responsibility for the activity audited.

6.5.3.4 Results of plant audits are approved by the Principal QA Specialist - Performance Evaluation Unit, and transmitted to the Executive Vice President - Power Supply and Engineering & Construction; the Senior Vice President - Power Supply; Vice President - Nuclear Operations; General Manager; and the Vice President - Corporate Nuclear Safety & Research; and others, as appropriate within 30 days after the completion of the audit.

6.5.3.5 The Corporate Quality Assurance Audit Program shall be conducted in accordance with written, approved procedures.

6.5.4 Outside Agency Inspection and Audit Program

6.5.4.1 An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite personnel or an outside fire protection firm.

6.5.4.2 An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

6.6

REPORTABLE OCCURRENCE ACTION

6.6.1

The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The NRC shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.2.
- b. Each REPORTABLE OCCURRENCE requiring 24-hour notification to the NRC shall be reviewed in accordance with 6.5.1.6.6 and submitted to the Manager - Corporate Nuclear Safety Section, and the Vice President - Nuclear Operations.

6.7

SAFETY LIMIT VIOLATION

6.7.1

The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10CFR50.72 shall be complied with.
- b. The provisions of 10CFR50.36(c)(1)(i) shall be complied with.
- c. The Safety Limit violation shall be reported to the NRC Region II, the Vice President - Nuclear Operations, and to the Manager - Corporate Nuclear Safety Section, within 24 hours.
- d. A Safety Limit Report shall be prepared. The report shall be reviewed in accordance with specification 6.5.1.6.6. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems, or structures; and (3) corrective action taken to prevent recurrence.
- e. The Safety Limit Violation Report shall be submitted to the NRC Region II, Vice President - Nuclear Operations, and the Manager - Corporate Nuclear Safety Section within 14 days of the violation.

6.8

NOT USED

6.8-1

AMENDMENT NO. 70

6.9

REPORTING REQUIREMENTS

Information to be reported to the NRC, in addition to the reports required by Title 10, Code of Federal Regulations, shall be as indicated in the following sections. Reports shall be addressed to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

6.9.1

Routine Reports

- a. Startup Report. A summary report of plant startup and power escalation shall be submitted following (1) amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests performed related to the startup and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

b. Annual Report

Prior to March 1 of each year a report shall be submitted which provides a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions⁽¹⁾, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific work functions.

⁽¹⁾This tabulation supplements the requirements of §20.407 of 10CFR Part 20.

c. Monthly Operating Report

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis. The report formats set forth in Appendices B, C, and D to Regulatory Guide 1.16 shall be completed in accordance with the instructions provided. The completed forms should be submitted by the tenth of the month following the calendar month covered by the report to the Director, Office of Management and Program Analysis, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, with a copy to the appropriate NRC Regional Office.

6.9.2 - Reportable Occurrences

The Reportable Occurrences of Specifications 6.9.2.a and 6.9.2.b below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of the occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference made to the original report date.

a. Prompt Notification With Written Followup

The types of events listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the appropriate Regional Office of Inspection and Enforcement or his designate no later than the first working day following the event, with a written followup report within two weeks. The written followup report shall include, as a minimum, a completed copy of the licensee event report form.

Information provided on the licensee event report shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- (1) Failure of the reactor protection system, or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety system setting in the Technical Specifications or failure to complete the required protective function.

Note: Instrument drift discovered as a result of testing need not be reported under this item (but see 6.9.2.a(5), 6.9.2.a(6), and 6.9.2.b(1) below.

- (2) Operation of the unit or affected systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the Technical Specifications.

Note: If specified action is taken when a system is found to be operating between the most conservative and least conservative aspects of a limiting condition for operation listed in the Technical Specifications, the limiting condition for operation is not considered to have been violated and no report need be submitted under this section (but see 6.9.2.b(2) below).

- (3) Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary or primary containment.

Note: Leakage of valve packing or gaskets within the limits for identified leakage set forth in Technical Specifications need not be reported under this section.

- (4) Reactivity anomalies involving disagreement with predicted value of reactivity balance under steady state conditions during power operation greater than or equal to 1% $\Delta k/k$; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the Technical Specifications; short-term reactivity increases that correspond to a reactor startup rate greater than 5 dpm, or if subcritical, an unplanned reactivity insertion of more than 0.5% $\Delta k/k$; or any unplanned criticality.

- (5) Failure or malfunction to one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.
- (6) Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.

Note: For 6.9.2.a(5) and 6.9.2.a(6) reduced redundancy that does not result in loss of system function need not be reported under this section (but see 6.9.2.b(2) and 6.9.2.b(3) below).

- (7) Conditions arising from natural or man-made events that, as a direct result of the event, require plant shutdown, operation of safety systems, or other protective measures required by Technical Specifications.
- (8) Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the Technical Specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.

- (9) Performance of structures, systems or components that require remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or Technical Specifications bases or discovery during plant life of conditions not specifically considered in the safety analysis report or Technical Specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

Note: This item is intended to provide for reporting of potentially generic problems.

- b. Thirty-day Written Reports. The reportable occurrences discussed below shall be the subject of written reports to the Director of the appropriate NRC Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of the licensee event report form, used for entering data into the NRC's computer-based file of information concerning licensee events. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- (1) Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the Technical Specifications but which do not prevent the fulfillment of the functional requirements of affected systems (but see 6.9.2.a(1) and 6.9.2.a(2) above).

- (2) Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation (but see 6.9.2.a(2) above).

Note: Routine surveillance testing, instrument calibration or preventive maintenance which require system configurations described in 6.9.2.b(1) and 6.9.2.b(2) above need not be reported except where test results themselves reveal a degraded mode as described above.

- (3) Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems (but see 6.9.2.a(6) above).
- (4) Abnormal degradation of systems other than those specified in 6.9.2.a(3) above designed to contain radioactive material resulting from the fission process.

Note: Sealed sources or calibration sources are not included under this item. Leakage of valve packing or gaskets within the limits for identified leakage set forth in Technical Specifications need not be reported under this item.

6.9.3

Special Reports

Special reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

	<u>Area</u>	<u>Reference</u>	<u>Submittal Date</u>
a.	Containment Leak Rate Testing	4.4	Upon completion of each test
b.	Containment Sample Tendon Surveillance	4.4	Upon completion of the inspection at 25 years of operation
c.	Post-operational Containment Structural Test	4.4	Upon completion of the test at 20 years of operation
d.	Fire Protection System	3.14	As specified by limiting condition for operation.
e.	Overpressure Pro- tection System Operation	3.1.2.1e	Within 30 days of operation.

- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Program.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR50.59.
- k. Records of meetings of the PNSC and of the independent reviews performed by the Corporate Nuclear Safety Section.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 70 TO FACILITY OPERATING LICENSE NO. DPR-23

CAROLINA POWER AND LIGHT COMPANY

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

1.0 Introduction

By letter dated July 10, 1981, Carolina Power and Light Company (the licensee) requested changes to the Appendix A Technical Specifications appended to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2. The proposed change would revise the Administrative Controls Section of the Technical Specifications to reflect corporate organizational changes, plant organizational changes, and changes in the Plant Nuclear Safety Committee (PNSC).

In support of the proposed change the licensee stated that:

The proposed change for the procedure review and approval process is consistent with that recommended by Regulatory Guide 1.33 and ANS/ANSI N3.2.

The proposed change to the PNSC will provide a more defined program of review and overview of the facility operation.

2.0 Discussion and Evaluation

Our evaluation of the licensee's proposed Technical Specifications is presented below. We have retained the format of the Technical Specifications in order to clarify our evaluation.

6.2 Organization

6.2.1 Offsite (Corporate) - The revised corporate report organization (TS Figure 6.2-1) is the same organization that was reviewed and found acceptable in conjunction with our evaluation of the organization and management of the Carolina Power and Light Company for operation of the Shearon Harris Nuclear Power Plant. Therefore, the offsite organization changes are found acceptable.

6.2.2 Onsite (Facility) - The revised TS Figure 6.2-2 for the new Robinson plant staff organization is similar but not identical to the proposed Shearon Harris plant staff organization discussed above.

Shearon Harris has a Manager, Environmental and Radiation Control; a Manager, Maintenance; and a Manager, Operations reporting to a Manager, Plant Operations who, in turn, reports directly to the General Manager. Robinson does not use the position of Manager, Plant Operations but instead combines the positions of Manager, Maintenance and Manager, Operations into a single position with the title Manager, Operations and Maintenance who reports directly to the General Manager.

The Manager, Environmental and Radiation Control, was changed to report directly to the General Manager in the Robinson organization. This change is in accordance with the criteria of NUREG-0731, "Criteria for Utility Management and Technical Competence," and Regulatory Guide 8.8, Section C.1.b(3).

We find that these differences are due to the fact that the Robinson plant staff is organized to support only one unit whereas the Shearon Harris plant staff is organized to support several units. We conclude that the Robinson plant staff as shown in proposed TS Figure 6.2-2 is acceptable.

6.2.2.a - The licensee proposes to change the required number of Control Operators (licensed Reactor Operators) listed in the TS from two to three and to add the requirement that a Shift Technical Advisor be included in the minimum shift complement. This change documents in the TS these two post-TMI requirements that have already been implemented by the licensee.

Section 6.3 Facility Staff Qualifications

The licensee proposes to add a Section 6.3.3 to specify Shift Technical Advisor qualification requirements. The proposed wording for this new section is consistent with the current NRC requirements for Shift Technical Advisor requirements and is acceptable.

6.4 Training

6.4.1 - The licensee proposed to delete the statement that specifies under whose direction the training program for facility staff shall be maintained.

6.4.2 - The licensee proposed to delete the statement that specifies under whose direction the training program for the Fire Brigade shall be maintained.

We believe that it is important to specify under whose direction these programs are to be maintained so that it can be assured that appropriate management direction of these programs is implemented. We concluded that the proposed deletion was unacceptable. However, during telephone discussions, the licensee agreed to retain the statement specifying the members of management under whose direction these programs are to be maintained.

6.5 Review and Audit

The licensee proposed to eliminate the current TS requirements for review of certain activities by the Plant Nuclear Safety Committee (PNSC). It also proposes that some, but not all, of the review requirements that are eliminated from the required list of PNSC reviews will be assigned to other plant staff personnel. In order to specify these revised review requirements, the licensee proposed to extensively modify and restructure TS Section 6.5, Review and Audit. It also proposed to eliminate TS Section 6.8, Procedures and to provide all requirements concerning procedures in Section 6.5. Whereas Section 6.5.1 of the current TS describes the Plant Nuclear Safety Committee (PNSC) and lists 10 specific items (items 6.5.1.7a-j) of review responsibility, the proposed change reorganizes Section 6.5 around and to provide specific and more detailed requirements related to the preparation, review and approval of the following activities:

- Procedures, Tests and Experiments (New Section 6.5.1.1)
- Modifications (New Section 6.5.1.2)
- Technical Specification and License Changes (New Section 6.5.1.3)
- Review of Technical Specification Violations (New Section 6.5.1.4)

6.5.1 Plant Nuclear Safety Committee (PNSC)

The licensee proposes to place this PNSC information in new Section 6.5.1.6.

6.5.1.1 Purpose - The licensee proposed to place the purpose description in new Section 6.5.1.6.1a, and to delete the current statement that the PNSC is chaired by the General Manager and composed of supervisory personnel. New Section 6.5.1.6.2 lists the Plant General Manager as the PNSC Chairman and lists the QA Director and Managers reporting directly to the Plant General Manager as members. We conclude that the deleted statement was redundant and its deletion is acceptable.

6.5.1.2 Composition - The licensee proposed to place this information in new Section 6.5.1.6.2 and to change the organization and composition of the PNSC to use a new administrative structure and to reflect its revised plant organization and position titles. The licensee proposes to:

- eliminate the position of Vice Chairman
- designate the Administrative Supervisor as PNSC Secretary
- designate the Director QA/QC and the four managers that report directly to the General Manager and their designated alternates as members
- eliminate the Training Supervisor from the list of members.

The other disciplines and functions currently included in the membership continue to be represented in the proposed membership but at a higher management level.

We find that the proposed PNSC membership is similar to those previously and currently approved by the NRC at other nuclear plants and is acceptable.

6.5.1.4 Consultants - The licensee proposes to delete the information in this section which states consultants shall be utilized as determined by the PNSC Chairman. We do not believe this statement is necessary or needed and find its deletion acceptable.

6.5.1.6 Quorum - The current quorum required by this section is four members. The licensee proposes to place this quorum information in new Section 6.5.1.6.5 and to retain this same quorum of four members. We note that for most plants the current quorum requirement is five members. However, it is not our practice to require that licensees modify their TS to meet the latest, most recently developed, or more stringent requirements each time they request a TS change. Since the current quorum requirement for Robinson is four members, we accept this same quorum in the revised TS.

6.5.1.7 Responsibilities - The licensee has proposed in new Section 6.5.1.1 on Procedures, Tests and Experiments and 6.5.1.2 on Modifications to specify a new requirement that a two-party review be performed prior to approval of

procedures, tests, experiments and plant modifications. This two-party review will provide a written safety analysis including a determination of whether or not the activity involves a change in the facility as described in the FSAR, a change to the TS or constitutes an unreviewed safety question.

The current TS Sections 6.5.1.7a, b and d specify that the PNSC be responsible for review of all proposed procedures, tests, experiments and plant modifications that affect nuclear safety. The licensee has proposed that procedures, tests, experiments and plant modifications that do not constitute an unreviewed safety question need not be reviewed by the PNSC. It proposed instead to require only the two-party review as discussed above and require approval prior to implementation by (1) the Plant General Manager or the Manager of the functional areas affected in the case of procedures, tests and experiments and by (2) the Plant General Manager or the Manager of Technical Support in the case of plant modifications.

It has also proposed that in the absence of any of these three, an alternate designated in writing by the Plant General Manager could approve these activities prior to implementation.

It is acceptable to us to have all of the currently required onsite review and investigative functions handled by a single committee (PNSC) as required by the current TS or to have only parts of the onsite review and investigative functions performed by a committee and the remainder performed by plant organizational units or personnel as is being proposed by the licensee.

However, we require that:

1. the qualifications of the personnel performing the review shall, as a minimum, meet the qualification requirements for professional-technical personnel specified by Section 4.4 of ANSI N18.1-1971
2. the participants shall collectively possess the background and qualifications in the subject matter under review to provide a comprehensive, inter-disciplinary review
3. the Plant General Manager shall be responsible to review and approve the reports and recommendations developed by the reviewers and forward them to the independent review group. We recognize that in order to fulfill this responsibility, the Plant General Manager may delegate some of these activities to other specific appropriate plant staff managers. This delegation must be in writing and specific to the particular review activity being performed.

We found that the proposed changes to the Robinson TS, as submitted by the licensee in its July 10, 1981 letter to the NRC did not adequately address all of these three requirements.

Requirement 1

By telephone communication the licensee subsequently agreed to modify its new Section 6.5.1.5.1 to state that individuals designated for the two-party safety reviews shall have a Bachelor of Science in engineering or related field or equivalent and two years related experience. This requirement meets

or exceeds the minimum qualifications specified in Section 4.4 of ANSI-N18.1-1971 and therefore is acceptable. The members of the PNSC are plant managers who are required to meet the qualifications for their particular management position as specified by Sections 4.2.1, 4.2.2, 4.2.3 and 4.2.4 of ANSI-N18.1-1971 and are therefore acceptable.

We also found that the proposed specification did not directly address the minimum qualification requirements for alternates to the PNSC. The licensee has informed us orally that it tries to appoint alternates who meet the qualification requirements for the management position held by the member for whom they serve. However, the licensee subsequently agreed to add the following statement to the licensee's proposed new Section 6.5.1.6.3:

"Alternates shall as a minimum meet the qualifications specified for professional-technical personnel in Section 4.4 of ANSI-N18.1-1971."

We find this addition acceptable.

Requirement 2

The proposed sections on two-party review do not address the need to assure that reviewers collectively possess the qualifications in the subject matter under review to provide a comprehensive interdisciplinary review. However, during subsequent telephone communications the licensee agreed to add the following statement to the proposed new Sections 6.5.1.1.4 and 6.5.1.2.3:

The Plant General Manager or other designated manager approving the review activities of the two-party review shall assure that the reviewers collectively possess the background and qualifications in all of the disciplines necessary and important to the specific review. To assure that the individuals selected for the two-party review are qualified and have the background necessary, the Plant General Manager shall approve and maintain a list of qualified persons. Included in this list will be individuals in addition to the first and second party reviewers whose expertise may be necessary during the review to assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review. The list will include the disciplines for which each person is qualified.

We conclude this addition acceptable.

Requirement 3

We find the licensee's proposal in new Section 6.5.1.4b that procedures, tests and experiments be approved by the "manager of the functional area affected by the procedures, tests, or experiments" appears to leave it up to the manager to decide if he or she is the approval authority for the case in point. We believe that the subject matter that is to be approved by each manager should be previously specified by the Plant Manager. Therefore, we require that the following statement be added to new Section 6.5.1.1.4b: "as previously designated by the Plant General Manager." We have added this statement in Attachment 1.

The licensee, by telephone communication, has subsequently proposed to modify new Sections 6.5.1.1.4a and 6.5.1.2.3a to add that the designated alternate to the Plant General Manager may approve two-party reviews. It has also agreed to delete new Sections 6.5.1.4c and 6.5.1.2.3c concerning appointment of alternates. We conclude that this change is acceptable.

The current TS Section 6.5.1.7e specified that the PNSC is responsible for investigation of all violations of TSs. The licensee proposed to delete both (1) the requirement that all violations of TSs be investigated and (2) the requirement that the PNSC is responsible for the investigation of TS violations. The licensee proposed instead, in new Section 6.5.1.4.1, to require investigation of only those TS violations that (1) require 24-hour reports to the NRC or (2) involve safety limit violations. It also proposed that reports of these investigations be approved by the General Manager or his designee. It did not state who performs the investigation or prepares the reports.

Deletion of the requirement for investigation of all TS violations is not acceptable. We require that all TS violations be investigated and that a report covering the evaluation and recommendations to prevent recurrence be prepared and submitted to the Manager - Corporate Nuclear Safety (independent review group) and to the Vice President - Nuclear Operations.

The licensee has subsequently informed us, by telephone communication, that it is (1) modifying its proposed Sections 6.5.1.4.1 and 6.5.1.6.6 to require that the PNSC perform a review of all violations to TSs. With these modifications we conclude that the proposed TSs require appropriate review of all TS violations and are acceptable.

The current TS Section 6.5.1.7f specifies that the PNSC is responsible for the review of facility operations to detect potential safety hazards. The licensee proposed to delete the requirement for review of facility operations

Section 6.6.1b that each reportable occurrence requiring 24-hour notification to the NRC shall be reviewed instead by the General Manager. The licensee subsequently informed us by telephone communication that it is modifying its proposal to reinstate the requirement that the PNSC review all events requiring a 24-hour report to the NRC as Section 6.5.1.6.6.e. Therefore we find this acceptable.

6.5.1.8 Authority - The licensee propose to delete the statement in current Section 6.5.1.8b that the PNSC recommend approval or disapproval of proposals reviewed under items 6.5.1.7a through d. It also propose to change the requirement in current Section 6.5.1.8b that the Vice President - Nuclear Operations and the Manager - Corporate Nuclear Safety be notified "immediately" of disagreements between the PNSC and the General Manager to notification within 24 hours.

The deletion of the requirement that the PNSC recommend approval or disapproval to the General Manager is of no consequence since the PNSC will in any event make the results of its review known to the General Manager, who is Chairman of the PNSC, and he will approve or disapprove them. Therefore, this deletion is acceptable. We find that "within 24 hours" is a reasonable time frame for advising corporate management of disagreements between the PNSC and the General Manager and conclude that this change is acceptable.

The licensee proposes to delete the requirement of current Section 6.5.1.8c that the PNSC shall make determinations as to whether or not proposals considered by the PNSC involve unreviewed safety questions. The licensee relies instead on requiring that this evaluation be performed as a part of the two-party review of all proposals.

In our discussion above of current Section 6.5.1.7 (Responsibilities), we stated that it is acceptable to have parts of the onsite review functions performed by plant organizational units or plant personnel as proposed by the licensee. Therefore, we conclude that it is acceptable to delete the requirement that the PNSC make such determinations and have it performed as part of the proposed two-party review of all proposals.

6.5.1.9 Records - The licensee did not propose any change to the current requirements for records which is now included in new Section 6.5.1.6.8.

6.5.1.10 Procedures - The licensee proposes to delete the current statement in Section 6.5.10 that written administrative procedures for PNSC operation be prepared and maintained. The licensee has informed us orally that it has retained the requirement that procedures for the PNSC (and for other review activities as well) be prepared and maintained through proposed TS Section 6.5.1.1.1 which requires that procedures listed in Appendix A to Regulatory Guide 1.33, Revision 2, February 1978 be established, implemented and maintained. The licensee has informed us orally that it interprets items 1c and 1h of this Appendix A as requiring procedures for the PNSC

and all other review processes, including the newly proposed two-party review of procedures, tests, experiments and modifications. We agree with the licensee, and therefore, conclude that deletion of the statement in current Section 6.5.10 is acceptable.

6.5.2 Corporate Nuclear Safety and Quality Assurance Audit Section (CNS and OAAS)

In reorganizing the corporate support organization, the licensee has, as shown in their proposed Figure 6.2.1, separated the corporate quality assurance function from the corporate safety and research function. The licensee proposed to modify the current Sections 6.5.2, 6.5.3, and 6.5.4 concerning independent review and audit to reflect this change.

6.5.2.1 - The licensee proposed to eliminate discussion of the audit function from this section and describe only the responsibilities of the Manager - Corporate Nuclear Safety (CNS) for administering the independent review function. The licensee proposed to delete the listing in current Section 6.5.3.3 of the subjects required to be reviewed by the Corporate Nuclear Safety Unit and restate these in new Section 6.5.2.1d as subjects for which the Manager CNS is responsible for assuring independent review. The modification deletes the current Section 6.5.2.1e which states the Manager's responsibility for distribution of reports and other records. We find that requirements for distribution are adequately covered in new Section 6.5.2.2 on followup action and conclude that deletion of Section 6.5.2.1e is acceptable.

6.5.3 Corporate Nuclear Safety Unit

6.5.3.1 - The licensee proposes to move the statement concerning the requirement that the Corporate Nuclear Safety Unit shall provide the independent offsite review to new Section 6.5.2, and reflect that this organization is now called the Corporate Nuclear Safety Section.

6.5.3.2 Personnel - The licensee proposes to move the information in this section to new Section 6.5.2.3. The only change proposed in the requirements is the deletion of the requirement in Section 6.5.3.2.6.2 that reviewers' experience include three years involvement with operation and/or design of nuclear power plants. With this deletion, the requirement reads "Bachelor of Science in Engineering or related field or equivalent and five years related experience" which is similar to that required for independent reviewers in the TSs for other plants that use a functional organization rather than a committee to perform the independent reviews. We do not currently impose a requirement on new licensees that reviewers involved in independent review activities have three years involvement with operation and/or design of nuclear plants, and on this basis, we conclude that the deletion of this requirement from the Robinson TS is acceptable.

6.5.3.3 Subjects Requiring Independent Review - As discussed above for current Section 6.5.2.1, the subjects requiring independent review are described under the Manager CNS's responsibilities in new Section 6.5.2.1d.

6.5.3.4 Followup Action - The licensee proposes to move the information and requirements in this current section to new Section 6.5.2.2 and change the organizational titles to reflect the new organization.

6.5.4 Quality Assurance Audit, Operation and Maintenance Unit

The information and requirements in this current section have been transferred with minimal change to new Section 6.5.3 entitled Performance Evaluation Unit. This new section is entitled Audit to parallel the title of new Section 6.5.2, Independent Review.

6.5.4.1 - This section describes the audits that were the assigned responsibility of the old Operation and Maintenance Unit and are now shown by the licensee in proposed new Section 6.5.3.1 as assigned to the Performance Evaluation Unit.

The licensee agreed by telephone to modify the structure of proposed new Section 6.5.3.2 to parallel that of new Section 6.5.2.1 and to list the performance evaluation unit manager's (Principal QA Specialist's) responsibilities that are listed in current TS Section 6.5.2.1, e.g., approves selection of individuals to conduct QA audits. We conclude this change is acceptable.

The licensee proposes to change the wording concerning frequency of audits as follows:

- 1) change items 6.5.4.1a and b from "at least once per year" to "at least once per 12 months"
- 2) change item 6.5.4.1d from "at least once per two years" to "at least once per 24 months"
- 3) change item 6.5.4.1f from "at least once per 12 months" to "at least once per 24 months"

This wording and the proposed frequency of the audits is consistent with the NRC current Standard Technical Specifications and is acceptable.

6.5.4.2a - The only proposed change to this section is to renumber it as new Section 6.5.3.2a.

6.5.4.2b - In addition to proposing to renumber current Section 6.5.4.2b as new Section 6.5.3.3b, the licensee proposed to add a new statement as follows: "Individuals performing the audits may be members of the audited organization; however, they shall not audit activities for which they have immediate responsibility, and while performing the audit, they shall not report to a management representative who has immediate responsibility for the activity audited." We have discussed this with QAB and have concluded that the addition is acceptable.

6.5.4.3 Reports - The licensee proposed to renumber this as new Section 6.5.3.3. It also proposes that the results of the audit shall be approved by the Principal QA Specialist - Performance and Evaluation Unit. The Principal QA Specialist is not a "management level" position in the licensee's organization. However, the Principal QA Specialist reports directly to the Manager, Corporate Quality Assurance, is the leader of the Performance Evaluation Unit, and manages its activities. We conclude, therefore, that approval of audit results by the Principal QA Specialist is acceptable.

The licensee also proposed to delete the requirement that the audit results be sent directly to the President/Chief Executive Officer. The licensee proposed to send audit results directly to the Executive Vice President - Power Supply and Engineering and Construction. This Executive Vice President has overall

responsibility for all of the Robinson operation and technical support activities and all corporate nuclear activities. On this basis, we conclude that it is acceptable to delete the requirement that audit results be sent directly to the President/Chief Executive Officer.

6.5.4.4 - No changes proposed except to renumber as new Section 6.5.3.4.

6.5.5 Fire Protection and Loss Prevention

The licensee proposes to renumber this section as new Section 6.5.4 and retitle it "Outside Agency Inspection and Audit Program."

The applicant proposed in new Section 6.5.4.2 to change the current Section 6.5.5.2 requirement for frequency of audit of the fire protection and loss program from "at intervals no greater than three years" to "at least once per 36 months."

We believe that the original wording "at intervals no greater than three years" which is also the wording used in the current Standard Technical Specification is more definitive and less subject to differing interpretations. The licensee has subsequently agreed by telephone communication to reinstate this original wording.

6.6 Reportable Occurrence Action

The licensee proposed to modify the requirement of the current Section 6.6.1b to address "Reportable Occurrences that require 24-hour notification to the NRC" and to state that these shall be reviewed by the General Manager. This proposed modification is unacceptable in that it infers that only the General

Manager is required to review these reports. As discussed above regarding Section 6.5.1.7, we require that events requiring 24-hour reports to the NRC be reviewed by the PNSC or by two or more other appropriate qualified professional-technical personnel and the General Manager. The licensee has subsequently agreed by telephone communication to modify its proposed Section 6.6.1b to retain the current requirement that these events be reviewed by the PNSC.

6.7 Safety Limit Violation

Actions to be taken in the event of a Safety Limit is violated remain as previously approved and are acceptable.

6.8 Procedures

The licensee has eliminated Section 6.8 and has incorporated all of its requirements with modifications in proposed new Section 6.5.1.

6.8.1 - The licensee proposed in new Section 6.5.1.1.1 to modify the current Section 6.8.1 requirements such that they are consistent with the current requirements of the NRC's Standard Technical Specifications. We conclude, therefore, that this modification is acceptable.

6.8.2 - This section currently requires that proposed procedures be reviewed by the PNSC and approved by the General Manager. As discussed above in our Section 6.5.1.7, the applicant proposed to change the requirement such that only procedures and changes thereto that involve unreviewed safety questions require review by the PNSC. Our evaluation of this proposal is discussed above in Section 6.5.1.7.

6.8.3 - This section currently deals with the requirements concerning temporary changes to procedures. The requirements of this section are incorporated with the following proposed changes in new Section 6.5.1.1.5:

- deletion of requirement for review by PNSC and approval of General Manager within three weeks of implementation
- addition of a specific statement that temporary changes will be incorporated as a permanent change or deleted within 21 days of receiving temporary approval.

We require that either the PNSC or other qualified professional-technical personnel, as discussed above concerning proposed changes to current TS Section 6.5.1.7, perform the reviews currently specified for the PNSC. The licensee has subsequently agreed by telephone to modify its proposed Section 6.5.1.1.5 to state that temporary changes shall be reviewed in accordance with specifications 6.5.1.1.2, 6.5.1.1.3, and 6.5.1.1.4 (which specify a two-party review with approval by the General Plant Manager or another designated Manager). We find that the added statement concerning incorporation or deletion of the temporary changes clarifies the current TS and is acceptable.

6.9 - Reporting Requirements

6.10 - Record Retention

These sections contain minor changes that were made mainly to be consistent with changes made in the previous sections. Therefore we conclude that these changes are acceptable.

3.0 Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

4.0 Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: June 28, 1982

UNITED STATES NUCLEAR REGULATORY COMMISSIONDOCKET NO. 50-261CAROLINA POWER AND LIGHT COMPANYNOTICE OF ISSUANCE OF AMENDMENT TO FACILITY
OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 70 to Facility Operating License No. DPR-23 issued to Carolina Power and Light Company (the licensee), which revised Technical Specifications for operation of the H. B. Robinson Steam Electric Plant, Unit No. 2 (the facility) located in Darlington County, South Carolina. The amendment is effective as of the date of issuance.

The amendment consists of revisions to the Appendix A Administrative Controls Section of the Technical Specifications to modify corporate and plant organizational structures and modifications to the Plant Nuclear Safety Committee (PNSC).

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since this amendment does not involve a significant hazards consideration.

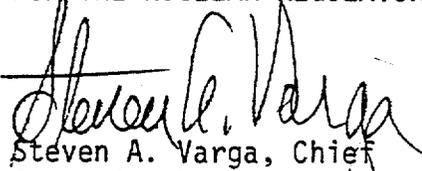
- 2 -

The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of this amendment.

For further details with respect to this action, see (1) the application for amendment dated July 10, 1981, (2) Amendment No. 70 to License No. DPR-23, (3) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D.C. and at the Hartsville Memorial Library, Home and Fifth Avenues, Hartsville, South Carolina 29550. A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Licensing.

Dated at Bethesda, Maryland, this 28th day of June 1982.

FOR THE NUCLEAR REGULATORY COMMISSION


Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing