

October 28, 1986

Docket No. 50-261

DISTRIBUTION

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Dear Mr. Utley:

The Commission has issued the enclosed Amendment No. 105 to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant Unit No. 2. This amendment consists of changes to the Technical Specifications in response to your request dated April 2, 1986.

The amendment revises the Technical Specifications to incorporate a corporate reorganization, staff qualification changes, position title changes, plant nuclear safety committee membership changes, and plant modification approval authority changes.

Your request to modify sections 6.2.1 and 6.2.3 to allow future organization changes to be made without a prior license request provided the change request is submitted within three months is denied (see 3rd paragraph of Safety Evaluation).

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular bi-weekly Federal Register notice.

Sincerely,

Glode Requa, Project Manager  
PWR Project Directorate #2  
Division of PWR Licensing-A

Enclosures:

1. Amendment No. 105 to DPR-23
2. Safety Evaluation

cc: w/enclosures  
See next page

LA:PAD#2  
DM Miller  
10/10/86

PM:PAD#2  
GRequa  
10/10/86

DBG  
Bachmann  
10/21/86

LR  
PD:PAD#2  
LRubenstein  
10/24/86

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*[Handwritten signature]*  
10/28/86

Mr. E. E. Utley  
Carolina Power & Light Company

H. B. Robinson 2

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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. 105  
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 April 2, 1986, 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.
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:

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(B) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 105, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Lester S. Rubenstein, Director  
PWR Project Directorate #2  
Division of PWR Licensing-A

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 28, 1986

ATTACHMENT TO LICENSE AMENDMENT

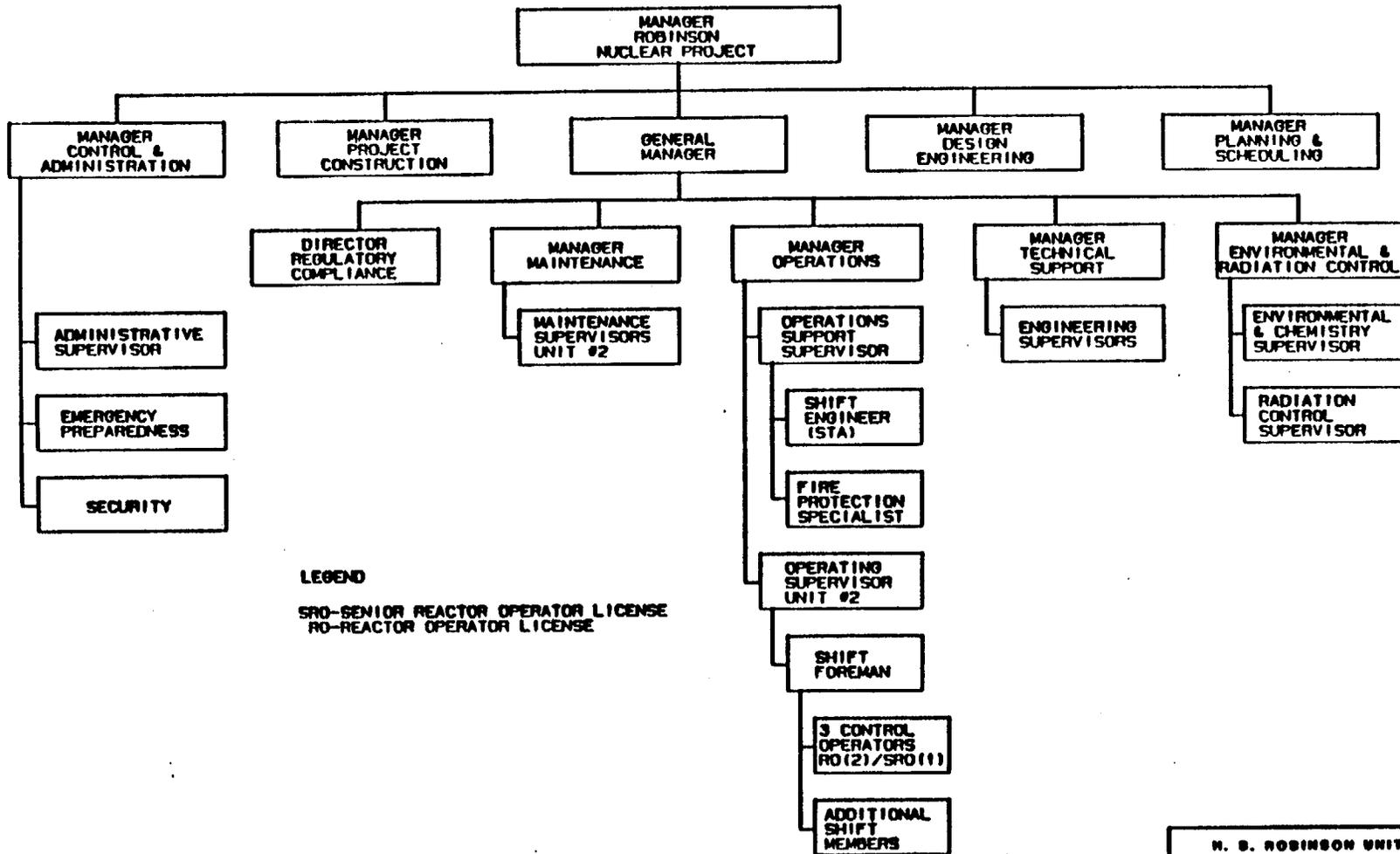
AMENDMENT NO. 105 FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
6.2-3	6.2-3
6.2-4	6.2-4
6.3-1	6.3-1
6.5-4	6.5-4
6.5-6	6.5-6
6.5-8	6.5-8
6.5-10	6.5-10
6.5-15	6.5-15





**LEGEND**

SRO-SENIOR REACTOR OPERATOR LICENSE  
 RO-REACTOR OPERATOR LICENSE

**H. S. ROBINSON UNIT #2**  
 Carolina Power & Light Company

**FACILITY ORGANIZATION**  
**ROBINSON NUCLEAR PROJECT**  
 Figure 0.2-2

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff performing functions similar or equivalent to those functions delineated in ANSI N18.1-1971 shall meet or exceed ANSI N18.1-1971 with regards 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 requirements 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.

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 10 CFR 50.59(a)(2) nor a change to the Technical Specifications shall be approved, prior to implementation, by one of the following:

- a) Manager - Robinson Nuclear Project, or designated alternate,  
or
- b) General Manager, Robinson Plant, or designated alternate

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

The Manager - Robinson Nuclear Project 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 Manager - Robinson Nuclear Project 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.

6.5.1.6 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, to advise the General Manager on all matters related to nuclear safety.

6.5.1.6.2 The PNSC shall be composed of the following:

- Chairman - General Manager or designated alternate
- Member - Manager - Operations or designated alternate
- Member - Manager - Maintenance or designated alternate
- Member - Manager - Technical Support or designated alternate
- Member - Director - Regulatory Compliance or designated alternate
- Member - Manager - Environmental & Radiation Control or designated alternate
- Member - Director - QA/QC or designated alternate
- Member - Manager - Design Engineering or designated alternate
- Member - Manager - Control & Administration or designated alternate

6.5.1.6.3 Alternates shall be appointed in writing by the General Manager to serve on a temporary basis. All alternates shall, as a minimum, meet qualification criteria specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel, or for those disciplines not listed in Section 4.4, the equivalent of the Section 4.4 requirement.

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.

## 6.5.2 Corporate Nuclear Safety Section - Independent Review

The Corporate Nuclear Safety Section of the Nuclear Safety & Environmental Services Department shall provide independent review of significant plant changes, tests, and procedures; verify that reportable events 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 Manager - Nuclear Safety & Environmental Services, 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 10 CFR 50.59(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

- b) Recommendations and concerns shall be submitted to the Plant General Manager and Manager - Robinson Nuclear Project within 14 days of determination.
  
- c) A summation of Corporate Nuclear Safety recommendations and concerns shall be submitted to the Chairman/President; Senior Executive Vice President - Power Supply and Engineering & Construction; Senior Vice President - Nuclear Generation; Manager - Robinson Nuclear Project; Manager - Nuclear Safety & Environmental Services; 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.

- 6.5.3.3 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 Manager - QA Services Section and transmitted to the Senior Executive Vice President - Power Supply and Engineering & Construction; the Senior Vice President - Nuclear Generation; Manager - Robinson Nuclear Project; General Manager; and the Manager - Nuclear Safety & Environmental Services; 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.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 105 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

Introduction

By letter dated April 2, 1986, Carolina Power and Light Company (CP&L) requested several changes to the Technical Specifications for the H.B. Robinson Plant, Unit 2. The requested changes involve a corporate reorganization, changes to staff qualifications, Plant Nuclear Safety Committee membership, approval authority for plant modifications, and a title change. These changes would affect Figures 6.2-1 and 6.2-2, and Section 6.2, 6.3, and 6.5 of the plant Technical Specifications (TS).

Evaluation

The first requested revision would change the Corporate Organization Chart, Figure 6.2-1, to reflect a recent reorganization of corporate management structure. Sections 6.5.2, 6.5.2.1, 6.5.2.2.C, and 6.5.3.4 would be revised to update organization titles. The reorganization involves a realignment of managerial responsibilities and a restructuring of areas of responsibilities within departments and sections. Overall, these changes do not appear to change existing responsibilities, but rather will realign them in a way which should increase management awareness and involvement in issues affecting plant operation. The reporting of QA audit results has been revised to include a full line of command from Senior Executive Vice President Power Supply and Engineering to Plant General Manager. Because these changes do not affect overall responsibilities or organizational commitments, we find them acceptable.

In addition to the organizational changes and title changes, this amendment request indicates that a statement would be added to Section 6.2.1 which would allow future changes to the corporate organization to be made without prior amendment to Figure 6.2-1, provided an amendment request is submitted within three months of the effective date of the change. We find this additional statement to be unacceptable. Incorporation of such a statement in the Technical Specifications would effectively exempt the licensee from the requirements of 10 CFR 50.59 and 10 CFR 50.90 which require a prior request for any changes of Technical Specifications.

The second requested revision would change the title of "Principal Engineer Operations" to "Operations Support Supervisor" (Figure 6.2-2). Since this is only a title change and does not involve any change in qualifications

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or responsibilities, we find it to be acceptable. The submittal indicates that a statement has been added to Section 6.2.3 allowing changes to the organization without a prior license amendment request provided the change request is submitted within three months. We find this additional statement to be unacceptable for the same reason previously stated - it is an implied exemption that has not been justified.

The third requested change would expand the applicability of the licensee's commitments regarding staff qualifications. Because this change to TS 6.3.1 represents an overall improvement in staff qualifications by making ANSI N18.1 more widely applicable, we find this change acceptable.

The fourth change requested by the licensee involves the addition of two members to the Plant Nuclear Safety Committee (PNSC). This change affects Section 6.5.1.6.2 of the plant Technical Specifications. Since this change enhances the PNSC by providing a broader perspective of review, we find the change acceptable.

We recommend that the licensee also reword Section 6.5.1.6.5 which specifies quorum requirements for the PNSC, to assure that the quorum represents a clear majority of the membership of the PNSC.

The last request is to revise Section 6.5.1.2.3 which establishes authority for final approval of plant modification packages. The change would restrict approval authority to the Manager of Robinson Nuclear Project and the General Manager of the Plant, or their designees. Currently, the Manager-Technical Support is also authorized to give final approval. Because the deletion of Manager-Technical Support from the authorization list will assure that only the Manager of Robinson Nuclear Project or the General Manager (or their designees) can approve plant modifications, and because that deletion is not expected to cause any delays in implementing safety related modifications, we find the requested change acceptable.

#### Summary

In summary, we find the changes to the plant Technical Specifications acceptable with the exception of the two statements that would exempt the licensee from the requirements of 10 CFR 50.59 and 10 CFR 50.90. Because the change to the PNSC membership affects the PNSC quorum requirements in Section 6.5.1.6.5, we recommend that Section 6.5.1.6.5 also be changed for the sake of consistency.

#### Environmental Consideration

This amendment relates to changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22 (c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) 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: October 28, 1986

Principal Contributor:

G. Lapinsky