

November 3, 1988

Docket No. 50-261

DISTRIBUTION
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Mr. E. E. Utley
Senior Executive Vice President
Power Supply and Engineering & Construction
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

Dear Mr. Utley:

SUBJECT: ISSUANCE OF AMENDMENT NO. 120 TO FACILITY OPERATING LICENSE NO.
DPR-23 - H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2,
REGARDING ORGANIZATION CHARTS DELETION (TAC NO. 68359)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 120 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 May 25, 1988, and amended by letter dated October 13, 1988.

The amendment changes the Technical Specifications to remove the offsite and facility organization charts consistent with the guidance of Generic Letter 88-06, "Removal of Organization Charts from Technical Specifications."

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,

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Ronnie H. Lo, Sr. Project Manager
Project Directorate II-1
Division of Reactor Projects I/II

Enclosures:

- 1. Amendment No. 120 to DPR-23
- 2. Safety Evaluation

cc w/enclosures:
See next page

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PDR ADOCK 05000261
P PNU

OFC	: LA:PD21:DRPR:PM:PD21:DRPR:D:PD21:DRPR :	:	:	:
NAME	: Anderson JRL/clh : EAdensam :	:	:	:
DATE	: 10/19/88 : 10/20/88 : 10/20/88 :	:	:	:

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N
cph

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

H. B. Robinson 2

cc:

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AMENDMENT NO. 120 TO FACILITY OPERATING LICENSE NO. DPR-23 - ROBINSON, UNIT 2

Docket File

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cc: Licensee/Applicant Service List

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

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

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

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 120
License No. DPR-23

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power & Light Company (the licensee), dated May 25, 1988 and amended by letter dated October 13, 1988, 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. 120, are hereby incorporated in the license. Carolina Power & Light Company 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

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Elinor G. Adensam, Director
Project Directorate II-1
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 3, 1988

OFC	:LA:PD21:DRPR:PM:PD21:DRPR:	LPEB:DLPO	: OGC	:D:PD21:DRPR	:
NAME	: PAnderson	: RLo:clh	: AGody	: EAdensam	:
DATE	: 10/19/88	: 10/20/88	: 10/24/88	: 10/31/88	: 10/27/88

ATTACHMENT TO LICENSE AMENDMENT NO. 120

FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove Pages

6.2-1
6.2-1a
6.2-2
6.2-3
6.2-4
6.2-5
6.2-6

Insert Pages

6.2-1
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6.2-2
6.2-3
6.2-4
6.2-5
6.2-6

6.2 ORGANIZATION

- 6.2.1 An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.
- a) Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the FSAR and updated in accordance with 10CFR50.71(e).
 - b) The Senior Vice President - Nuclear Generation shall have corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
 - c) The General Manager - Robinson Plant shall be responsible for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
 - d) Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.
 - e) Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the manager responsible for health physics shall have direct access to that onsite individual

having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

6.2.2 Definitions

- a) Personnel reporting to the General Manager - Robinson Plant shall be identified in Section 6 of the Technical Specifications as the plant staff.
- b) Personnel reporting to the Manager - Control and Administration shall be identified in Section 6 of the Technical Specifications as the C&A staff.

Facility Staff

6.2.3 The Robinson Nuclear Project organization shall be subject to the following:

- a) The shift complement during hot operations shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Senior Control Operator holding a Senior Reactor Operator's License, two Control Operators each holding a Reactor Operator's License, two additional shift members, and one Shift Technical Advisor. If an individual that holds a Senior Reactor Operator's License also meets the Shift Technical Advisor requirements, that individual may act in both capacities. The limitations on the use of overtime applies to the HBR2 Shift Foremen, Senior-Control Operators, Control Operators, and Shift Engineers. These limitations apply only when HBR2 Reactor Coolant System is greater than 200 F or when fuel is being moved within the Reactor Pressure Vessel. These limitations may be applied to other key "safety" personnel as warranted by the plant conditions and other circumstances at the discretion of the Plant General Manager.

CP&L's overtime policy is summarized as follows:

- 1) An individual shall not be permitted to work more than 12 hours straight (not including shift turnover time).
- 2) An individual will have at least the same number of hours off between work periods as the length of his last work period (not including shift turnover time).
- 3) An individual shall not work more than 84 hours in any 7 day period (not including shift turnover time).
- 4) An individual shall not work more than 14 consecutive days without having two consecutive days off.

Under very unusual circumstances, deviations from above restrictions may be authorized by the Plant General Manager. When the overtime required exceeds the limitations described above, the circumstances must be documented.

- b) The shift complement during cold shutdown shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Control Operator holding a Reactor Operator's License, and one additional shift member.
- c) At least one licensed operator shall be in the control room when fuel is in the reactor.
- d) 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.
- e) An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.

- f) 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.

- g) A plant fire brigade of at least five 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.

- h) The shift complement may be one less than the minimum requirement of Section 6.2.3.a and 6.2.3.b for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift members provided immediate action is taken to restore the shift complement to within the minimum requirements of Section 6.2.3.a and 6.2.3.b. This provision does not permit any shift member position to be unmanned upon shift change due to an oncoming shift member being late or absent.

Fire brigade may be one less than the minimum requirement of Section 6.2.3.g for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

FIGURE 6.2-1

DELETED

FIGURE 6.2-2

DELETED



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 120 TO FACILITY OPERATING LICENSE NO. DPR-23

CAROLINA POWER & LIGHT COMPANY

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

DOCKET NO. 50-261

1.0 INTRODUCTION

By letter dated May 25, 1988 and amended by letter dated October 13, 1988, the Carolina Power & Light Company (the licensee) submitted a request for changes to Technical Specifications (TS) 6.2, Organization. The proposed changes would remove Figure 6.2-1, Offsite Organization & Facility Management, and Figure 6.2-2, Facility Organization, and replace them with a narrative description of the offsite and onsite organizations functional requirements in TS 6.2-1. Guidance for these proposed changes to the TS was provided to licensees and applicants by Generic Letter 88-06, dated March 22, 1988.

2.0 BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 6.2.1 and 6.2.3 of the administrative control requirements have referenced offsite and facility (onsite) organization charts that are provided as figures to these sections. Restructuring of either the offsite or unit organizations has required the licensee to submit a license amendment for NRC approval to reflect the desired changes in these organizations.

Because of these limitations on organizational structure, the nuclear industry has highlighted this as an area for improvement in the TS. The Shearon Harris licensee proposed changes to remove organization charts from its TS under the lead-plant concept that included the endorsement of the proposed changes by the Westinghouse Owners Group. In its review of the Shearon Harris proposal, the staff concluded that most of the essential elements of offsite and onsite organization charts are captured by other regulatory requirements, notably, Appendix B to 10 CFR Part 50. However, there are aspects of the organizational structure that are important to ensure that the administrative control requirements of 10 CFR 50.36 would be met and that would not be retained with the removal of the organization charts. The applicable regulatory requirements are those administrative controls that are necessary to ensure safe operation of the facility. Therefore, those aspects of organization charts for Shearon Harris that were essential for conformance with regulatory requirements were added (1) to Specification 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to Specification 6.2.2 to define qualification requirements of the unit staff.

By letter dated January 27, 1988, the staff issued Amendment No. 3 to Facility Operating License NFP-63 for the Shearon Harris Nuclear Power Plant that incorporated these changes to their TS. Subsequently the staff developed guidance on an acceptable format for license amendment requests to remove the organization charts from TS. Generic Letter 88-06 provided this guidance to all power reactors.

3.0 EVALUATION

The licensee's proposed changes to its TS are in accordance with the guidance provided by Generic Letter 88-06 and addressed the items listed below.

- (1) Specifications 6.2.1 and 6.2.3 were revised to delete the references to Figures 6.2-1 and 6.2-2 that were removed from the TS.
- (2) Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.2-1 and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in the FSAR and updated in accordance with 10 CFR 50.71(e).
- (3) The organization chart for the unit staff does not stipulate senior reactor operator or reactor operator license qualified positions except for 3 control operators. Hence, this is not an applicable consideration related to the removal of the organization charts from the TS for the plant.
- (4) Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee has confirmed that this documentation currently exists in the FSAR.
- (5) The licensee has confirmed that no specifications, other than those noted in item (1) above, include references to the figures of the organization charts that are being removed from TS for their plant. Hence, this is not an applicable consideration, with regard to the need to redefine referenced requirements as a result of the removal of these figures.

On the basis of its review of the above items, the staff concludes that the licensee has provided an acceptable response to these items as addressed in the NRC guidance on removing organization charts from the administrative control requirements of the TS. Furthermore, the staff finds that these changes are consistent with the staff's generic finding on acceptability of such changes as noted in Generic Letter 88-06. Accordingly, the staff finds the proposed changes to be acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, or administrative procedures or requirements. Accordingly, the 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 these amendments.

5.0 CONCLUSION

The Commission made a proposed determination that this amendment involves no significant hazards consideration, which was published in the FEDERAL REGISTER (53 FR 24506) on June 29, 1988, and consulted with the State of South Carolina. No public comments or requests for hearing were received, and the State of South Carolina did not have any comments.

The Staff has 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.

Principal Contributors: Ronnie H. Lo, PDII-1
Thomas G. Dunning, OTSB

Dated: November 3, 1988