

March 31, 1995

Mr. C. S. Hinnant, Vice President
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
Post Office Box 790
Hartsville, South Carolina 29551-0790

SUBJECT: ISSUANCE OF AMENDMENT NO. 160 TO FACILITY OPERATING LICENSE NO. DPR-23 REGARDING NUCLEAR ASSESSMENT SECTION - H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 (TAC NO. M90002)

Dear Mr. Hinnant:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 160 to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2. This amendment changes the Technical Specifications in response to your request dated July 22, 1994, as supplemented March 6, 1995.

The amendments change the Technical Specifications to implement a performance based assessment program, including corresponding organizational and functional changes. Specifically, the changes affect the independent assessment of plant activity and the independent review function, the independent assessment of plant activity and the Independent Safety Engineering Group. These functions will be performed by the Nuclear Assessment Section (NAS). The NAS's fundamental role will be to: (1) assist plant management in the early identification of issues that may prevent the plant from achieving quality, and (2) ensure effective correction of deficiencies.

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

Sincerely,
ORIGINAL SIGNED BY:

Brenda L. Mozafari, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosures:

- 1. Amendment No. 160 to DPR-23
- 2. Safety Evaluation

cc w/enclosures:
See next page

DOCUMENT NAME: G:\ROBINSON\ROB90002.AMD

OFFICE	LA: PRT/CSI	PM: PDII-1	D: PDII-1	OGC	
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AMENDMENT NO. 160 TO FACILITY OPERATING LICENSE NO. DPR-23 - H. B. ROBINSON
STEAM ELECTRIC PLANT, UNIT NO. 2

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Plant, Unit No. 2

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

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

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 160
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 July 22, 1994, as supplemented March 6, 1995, 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:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 160, 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 and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Brenda Mozafari for

William H. Bateman, Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 31, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 160

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.

<u>Remove Pages</u>	<u>Insert Pages</u>
6.5-3	6.5-3
6.5-5	6.5-5
6.5-6	6.5-6
6.5-7	6.5-7
6.5-7a	6-5-7a
6.5-8	6.5-8
6.5-9	6.5-9
6.5-10	6.5-10
6.5-11	6.5-11
6.5-12	6.5-12
6.5-13	6.5-13
6.5-14	6.5-14
6.5-15	6.5-15
6.6-1	6.6-1
6.7-1	6.7-1
6.10-2	6.10-2

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 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 Specifications 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 Nuclear Assessment Section prior to implementation.

6.5.1.1.7 Procedures, tests, or experiments, which constitute a change to the facility as described in the UFSAR shall also be reviewed by the Nuclear Assessment Section. These reviews may be conducted after plant Management approval, and implementation may proceed prior to completion of review as provided for by 10 CFR 50.59(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 UFSAR, involves a change to the Technical Specifications, or constitutes an unreviewed safety question as defined in 10 CFR 50.59(a)(2).

6.5.1.2.4 Modifications that are determined to either constitute an unreviewed safety question, as defined in 10 CFR 50.59(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 Nuclear Assessment 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 Nuclear Assessment 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 event and that provides recommendations to prevent recurrence. Such reports shall be reviewed by the Plant Nuclear Safety Committee and approved by the Plant General Manager or his designee and submitted to the Vice President - Robinson Nuclear Plant and to the Manager - Nuclear Assessment Section.

6.5.1.5 Nuclear Safety Review Qualification

6.5.1.5.1 Individuals shall be designated by the Vice President - Robinson Nuclear Project 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 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, to advise the General Manager on all matters related to nuclear safety.

6.5.1.6.2 The PNSC shall be composed of a Chairman and seven to nine members. The members shall be from the following functional areas,

Operations
Maintenance
Engineering
Health Physics/Chemistry
Regulatory Affairs
Nuclear Assessment

6.5.1.6.3 The PNSC Chairman, alternate Chairmen, members, and alternate members shall be designated in writing by the plant General Manager. Members shall be individuals who are unit manager level or above from the site management organization. Alternate members shall, as a minimum, meet equivalent qualification criteria as specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel.

6.5.1.6.4a The quorum of the PNSC necessary for the performance of the activities of these Technical Specifications shall consist of the Chairman (or his designated alternate) and four members (including alternates).

6.5.1.6.4b No more than two alternates shall be counted toward meeting the quorum requirement or participate as voting members of the PNSC at any one time.

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

6.5.1.6.6 The PNSG 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 - Nuclear Assessment Section.
- 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 reportable events.
- f) Review of facility operations to detect potential nuclear safety hazards.
- g) Review of every unplanned on site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrences to the Vice President - Robinson Nuclear Plant.
- h) Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.
- i) Review of major changes to radioactive liquid, gaseous, and solid waste treatment systems.
- j) Review of changes to the CORE OPERATING LIMITS REPORT.
- k) Annual review of the Fire Protection Program, including Program changes.

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 Manager to be more conservative will be followed. The Vice President - Robinson Nuclear Plant 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 - Robinson Nuclear Plant and to the Manager - Nuclear Assessment Section. |

6.5.2 Nuclear Assessment Section Independent Review Program

6.5.2.1 FUNCTION

The Nuclear Assessment Section shall function to provide independent review of plant changes, tests, and procedures. In addition, the independent review function will 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.

6.5.2.2 ORGANIZATION

6.5.2.2.1 The individuals assigned responsibility for independent reviews shall be qualified in specific disciplines. These individuals shall collectively have the experience and competence required to review activities in the following areas:

- a) nuclear power plant operations
- b) nuclear engineering
- c) chemistry and radiochemistry
- d) metallurgy
- e) nondestructive testing
- f) instrumentation and control
- g) radiological safety
- h) mechanical and electrical engineering
- i) administrative controls
- j) seismic and environmental
- k) quality assurance practices
- l) other appropriate fields

6.5.2.2.2 The Manager - Nuclear Assessment Section shall have a bachelor's degree in an engineering or related field and, in addition, shall have a minimum of ten years' related experience, of which five years shall be in the operation and/or design of nuclear power plants.

6.5.2.2.3 The individuals performing independent safety reviews shall have a bachelor's degree in an engineering or related field or equivalent and, in addition, shall have a minimum of five years' related experience.

- 6.5.2.2.4 An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Nuclear Assessment Section, competent individuals from other CP&L organizations or outside consultants shall be utilized in performing independent reviews and investigations.
- 6.5.2.2.5 The documents submitted under 6.5.2.3 shall be reviewed by individuals meeting the requirements of 6.5.2.2.1 and 6.5.2.2.3 to ensure all applicable disciplines are encompassed. Multiple reviews will be conducted on documents where required to meet applicable disciplines of 6.5.2.2.1.
- 6.5.2.2.6 Independent safety reviews shall be performed by individuals not directly involved with the activity under review or responsible for the activity under review.
- 6.5.2.2.7 The Nuclear Assessment Section Independent Safety Review Program shall be conducted in accordance with written, approved procedures.

6.5.2.3 REVIEW

Nuclear Assessment Section shall perform reviews of the following:

- a. Written safety evaluations of changes in the facility as described in the UFSAR, changes in procedures as described in the UFSAR, and tests or experiments not described in the UFSAR which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). These reviews are to verify that such changes, tests, or experiments do not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.
- b. Proposed changes in procedures required by these Technical Specifications, proposed changes in the facility, or proposed tests or experiments, any of which involve a change in the Technical Specifications or an unreviewed safety question pursuant to 10 CFR 50.59(a)(2) prior to implementation.
- c. Proposed changes to the Technical Specifications or this Operating License prior to implementation.

- d. Violations, deviations, and reportable events, which require reporting to the NRC in writing, such as:
 - 1. violations of applicable codes, regulations, orders, Technical Specifications, license requirements, or internal procedures or instructions have safety significance;
 - 2. significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components; and
 - 3. reportable events, as specified in 10 CFR 50.73.
- e. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Section deems appropriate for consideration or which is referred to by the Manager - Nuclear Assessment Section by the on-site operating organization, PNSC, or by other functional organizational units within CP&L.

6.5.2.4 RECORDS

- (a) Results of Nuclear Assessment Section independent safety reviews shall be documented and retained.

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6.5.3 Nuclear Assessment Section Assessment Program

6.5.3.1 Assessments of facility activities shall be performed by the Nuclear Assessment Section. Assessments will be performance based and will be scheduled based on plant performance and importance to safety but at a frequency not to exceed 24-months. These assessments shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the entire facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50.
- e. Any other area of facility operation considered appropriate by the Vice President - Robinson Nuclear Plant.
- f. The Radiological Environmental Monitoring Program and the results thereof.
- g. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- h. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes.

6.5.3.2 Assessments of activities prescribed by the Code of Federal Regulations will be performed at the frequencies prescribed by the applicable regulation. These assessments shall encompass:

- a. Emergency Preparedness (per 10 CFR 50.54(t))
- b. Security (per 10 CFR 50.54(p))
- c. Radiation Protection (per 10 CFR 20.1101)

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6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for events requiring immediate notification:

- a) The NRC shall be notified pursuant to the requirements of 10 CFR 50.72.
- b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Nuclear Assessment Section, and the Vice President - Robinson Nuclear Plant.

6.6.2 The following actions shall be taken for reportable events requiring a Licensee Event Report:

- a) A report shall be submitted to the NRC pursuant to the requirements of 10 CFR 50.73.
- b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Nuclear Assessment Section, and the Vice President - Robinson Nuclear Plant.

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 10 CFR 50.72 shall be complied with.
- b) The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with.
- c) The safety limit violation shall be reported to the NRC Region II within one hour and the Vice President - Robinson Nuclear Plant 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, Vice President - Robinson Nuclear Plant, and the Manager - Nuclear Assessment Section within 14 days of the violation.

- 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 review 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. |
- l. Records of data results required by the radiological environmental monitoring program.
- m. Records of Independent Reviews. |



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 160 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 July 22, 1994, as supplemented March 6, 1995, Carolina Power & Light Co. (CP&L) requested changes to the Administrative Controls Section of the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit 2 (HBR). These changes supersede the TS changes requested by letter dated September 15, 1993. The following is a brief description and our evaluation of the requested changes.

2.0 EVALUATION

a. Section 6.5.1.1 - Review and Audit - Procedures, Tests, and Experiments

CP&L proposes to revise in subsection 6.5.1.1.7 the phrase "change to the FSAR" to "change in the facility as described in the UFSAR;" and in subsection 6.5.1.2.1 change "FSAR" to "UFSAR".

The NRC staff finds these changes acceptable as they are editorial in nature.

b. Section 6.5.1.2 - Review and Audit - Modifications

CP&L proposes to change the reference in subsections 6.5.1.1.6, 6.5.1.1.7, 6.5.1.2.4, 6.5.1.2.5 and 6.5.1.4.1 from Nuclear Assessment Department (NAD) to Nuclear Assessment Section (NAS).

The NRC staff finds these changes acceptable as they reflect the proposed revised organization.

c. Section 6.5.1.6 - Plant Nuclear Safety Committee (PNSC)

CP&L proposes to:

1. Revise the description of the organizational provisions of the PNSC by deleting reference to members by position title, reformatting the subsections, and redefining the quorum and

alternate requirements. The description of the PNSC membership would specify functional areas. Qualification requirements would specify organizational level and reference to an industry standard.

2. Change the reference in subsection 6.5.1.6.6.b from Manager, Nuclear Assessment Department to Manager, Nuclear Assessment Section; and delete in subsection 6.5.1.6.6.g the requirement for forwarding of reports with respect to unplanned site release of radioactive material and subsequent corrective actions to the Manager, Nuclear Assessment Department.
3. Delete the requirement in subsection 6.5.1.6.7 for notification of the Manager, Nuclear Assessment Department of disagreements between the Plant General Manager and the PNSC. In addition, the title Vice President - Robinson Nuclear Project is changed to Vice President - Robinson Nuclear Plant.
4. Change in subsection 6.5.1.6.8 the distribution of PNSC minutes from the Manager, Nuclear Assessment Department to the Manager, Nuclear Assessment Section.

The NRC staff finds these changes acceptable as they meet the appropriate acceptance criteria of Section 13.4 of NUREG 0800, the Standard Review Plan, and they reflect the proposed revised organization.

d. Section 6.5.2 - Nuclear Assessment Section (NAS) Independent Review Program

CP&L proposes to delete the Nuclear Assessment Department and replace it with a Nuclear Safety Assessment Independent Review Program. Therefore, this section has been retitled to NAS Independent Review Program and undergone a major rewrite. The numerous changes include:

1. Redefining the preamble and moving it to a new section 6.5.2.1.
2. Deleting the functions of the Manager, Nuclear Assessment Department with respect to approval of individuals conducting safety reviews, access to plant records, and the preparation and retention of records of reviews.
3. Relocating the existing requirements of subsections 6.5.2.1.d.1, 6.5.2.1.d.3, and 6.5.2.1.d.5 to subsections 6.5.2.3.a, 6.5.2.3.c, and 6.5.2.3.e, respectively.
4. Relocating the existing requirement of subsection 6.5.2.1.d.2 to 6.5.2.3.b and changing the phrase "changes in procedures" to "changes in procedures required by these Technical Specifications," moving the phrase "prior to implementation" to the first sentence, and deleting the last sentence.
5. Deleting the existing requirement from subsection 6.5.2.1.d.4 as this requirement is included in the revised subsection 6.5.2.3.d.

6. Deleting the requirement, subsection 6.5.2.1.d.6, that NAD review reports and minutes of the PNSC.
7. Relocating the existing requirements of subsections 6.5.2.1.c and 6.5.2.2.a to subsection 6.5.2.4.a.
8. Deleting the requirements of subsections 6.5.2.2.b and 6.5.2.2.c that require retention of copies of documented reviews in the NAD files and submittal of recommendations and concerns to the Plant General Manager and Vice President, Robinson Nuclear Project.
9. Relocating the existing requirement of subsection 6.5.2.2.d to subsection 6.5.2.2.7.
10. Relocating the existing requirement of subsection 6.5.2.3.a to subsection 6.5.2.2.1 and modifying the list of disciplines by adding the area of "other appropriate fields."
11. Relocating the existing requirements of subsections 6.5.2.3.b(1) and (2) to subsections 6.5.2.2.2 and 6.5.2.2.3, and changing the term "Bachelor of Science" to "bachelor's degree."
12. Relocating the existing requirements of subsection 6.5.2.3.c and 6.5.2.3.e to subsections 6.5.2.2.4 and 6.5.2.2.6.
13. Relocating the existing requirement of subsection 6.5.2.3.d to subsection 6.5.2.2.5 and redefining the requirement that at least three persons shall review each item. The new requirement states that documents shall be reviewed by individuals meeting the appropriate qualifications, including multiple reviews where required to meet the applicable disciplines.

It should be noted that the NAS function will report to the Site Vice President rather than to the offsite position of Executive Vice President, Nuclear Generation.

The NRC staff finds these changes acceptable as they conform to ANSI N18.7 - 1976; have been previously approved for another CP&L plant; are required by other existing HBR TS; are included in the Quality Assurance (QA) program; incorporate the currently required functions; are editorial in nature; and reflect the proposed revised organization. In addition, with respect to the new NAS reporting relationship, the NRC staff considers that the acceptability of this arrangement is, in part, based on the effectiveness of the Nuclear Services Department Performance Evaluation Section (PES) that provides an offsite check and balance to the onsite assessment function. The licensee provided a detailed description of the PES assessment activities with respect to the NAS in its March 6, 1995, letter. The NRC staff finds this description acceptable. The PES is described in Section 17.3.3.2 of the proposed revised Quality Assurance Program.

e. Section 6.5.3 - NAS Assessment Program

CP&L proposes to retitle this section from the current title of Nuclear Assessment Department Audit Program to Nuclear Assessment Program. This changes the reporting of this function to the onsite Vice President Nuclear. The change deletes the specific audit frequencies and establishes a maximum frequency of 24 months. The change also alters the function from an audit-based to a performance-based assessment program. The change also deletes the specific details with respect to audit personnel that are addressed in the QA Program.

The NRC staff finds these changes acceptable as they meet the acceptance criteria of Sections 13.4 and 17.3 of NUREG 0800, the Standard Review Plan, conform to the Improved Standard Technical Specifications, or are included in other existing HBR TS. With respect to the organizational arrangement see item d. above.

f. Sections 6.6 and 6.7 -Reportable Events and Safety Limit Violations

The proposed revision of subsections 6.6.1.b, 6.6.2.b, 6.7.1 c and 6.7.1.e deletes the reference to the Manager, Nuclear Assessment Department and replaces it with reference to the position of Manager, Nuclear Assessment Section, changes the words "Robinson Nuclear Project" to "Robinson Nuclear Plant," and deletes the requirement for the Manager, Nuclear Assessment Department to receive a 24-hour notification of Safety Limit Violations.

The NRC staff finds these changes acceptable as they reflect the proposed revised organization.

g. Section 6.10.2.k - Records

CP&L proposes to delete the recordkeeping for independent reviews performed by the previous Corporate Nuclear Safety (CNS) System, and to relocate the requirement to retain records of independent reviews performed by the Nuclear Assessment Department to a new Subsection m. Records of the previous CNS reviews will be maintained by the NAS.

The NRC staff finds these changes acceptable as they will provide for the retention of NAD assessment activities, and require retention of NAS assessments.

3.0 SUMMARY

The NRC staff has found the changes requested by CP&L letter dated July 22, 1994, to the Administrative Controls Section of the TS for HBR acceptable, as they meet the appropriate acceptance criteria of Sections 13.4 and 17.3 of NUREG 0800, the Standard Review Plan, and conform to the improved ISTS.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of South Carolina official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment changes recordkeeping, reporting, 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 this amendment.

6.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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