

Docket No. 50-261

December 30, 1992

Mr. R. A. Watson  
Senior Vice President  
Nuclear Generation  
Carolina Power & Light Company  
Post Office Box 1551  
Raleigh, North Carolina 27602

Dear Mr. Watson:

SUBJECT: ISSUANCE OF AMENDMENT NO. 144 TO FACILITY OPERATING LICENSE NO.  
DPR-23 REGARDING OVERTIME LIMITS PROMULGATED BY GENERIC LETTER  
82-12 - H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2,  
(TAC NO. M77162)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 144 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 (TS) in response to your request dated July 9, 1990, as supplemented January 17, and December 28, 1992.

The amendment provides consistency with the overtime work limits promulgated by Generic Letter 82-12 and also re-numbers subsequent items within TS Section 6.2.3.

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

Enclosures:

1. Amendment No. 144 to DPR-23
2. Safety Evaluation

cc w/enclosures:  
See next page

**\*SEE PREVIOUS CONCURRENCE**

OFC	LA:PD21:DRPE	PM:PD21:DRPE	D:PD21:DRPE	OGC*w/change	
NAME	SLA:te	Bmozafari:tms	EAdensam	CPW	
DATE	12/30/92	12/30/92	12/30/92	12/15/92	

Document Name: ROB77162.AMD

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Mr. R. A. Watson  
Carolina Power & Light Company

H. B. Robinson Steam Electric  
Plant, Unit No. 2

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AMENDMENT NO. 144 TO FACILITY OPERATING LICENSE NO. DPR-23 - H. B. ROBINSON  
STEAM ELECTRIC PLANT, UNIT NO. 2

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cc: Robinson Service List



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. 144  
License No. DPR-23

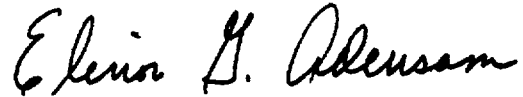
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Carolina Power & Light Company (the licensee), dated July 9, 1990, as supplemented January 17, and December 28, 1992, complies with the standards and requirements of the Atomic Energy Act of 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. 144, 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

A handwritten signature in cursive script, reading "Elinor G. Adensam".

Elinor G. Adensam, 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: December 30, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 144

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

6.2-2  
6.2-3  
6.2-4

Insert Pages

6.2-2  
6.2-3  
6.2-4

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

Personnel reporting to the General Manager - Robinson Plant shall be identified in Section 6 of the Technical Specifications as the plant 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.
- b) Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., Licensed Senior Operators, Licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant General Manager or his designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant General Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- c) 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.



- d) At least one licensed operator shall be in the control room when fuel is in the reactor.
- e) 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.
- f) An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- g) 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.
- 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.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 144 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 9, 1990, as supplemented January 17, and December 28, 1992, Carolina Power & Light Company (the licensee) requested a revision to the H. B. Robinson Steam Electric Plant, Unit 2 (HBR2), Technical Specifications (TS) to provide consistency with the overtime work limits promulgated by Generic Letter (GL) 82-12, "Nuclear Power Plant Staff Working Hours." The existing HBR2 TS are inconsistent with the GL 82-12 working hour guidelines in three principal areas: (1) the overtime limits do not apply to auxiliary operators, maintenance personnel, or health physics personnel; (2) the overtime limits apply only when the reactor coolant temperature is greater than 200 degrees Fahrenheit or when fuel is being moved within the reactor pressure vessel; and (3) the overtime limit for hours worked in any 7-day period is less conservative. The January 17, and December 28, 1992, letters provided updated TS pages and did not affect the initial no significant hazards consideration determination.

2.0 EVALUATION

The staff reviewed section 6.2.3.b of the proposed TS amendment provided as an enclosure to the licensee's July 9, 1990, amendment request. The review focused on determining the consistency of the proposed amendment with the guidelines provided in the Commission's "Policy On Factors Causing Fatigue of Operating Personnel at Nuclear Reactors" (Policy) promulgated by GL 82-12.

The staff found that the proposed amendment is generally consistent with the Policy. The proposed amendment: (1) applies to unit staff who perform safety-related functions (e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel), (2) applies to all modes of operation, and (3) establishes limits on individual working hours that are identical with the guidelines provided in the Policy. Consequently, the staff has determined that the three previously identified areas of inconsistency with the Policy are adequately resolved by the proposed amendment.

The staff identified one difference between the proposed amendment and the Policy. The proposed amendment does not include a statement establishing a nominal 40-hour week as an objective while the plant is in power operation. The staff recognizes that the licensee has implemented a normal 12-hour shift schedule and that 12-hour shift schedules do not result directly in 40-hour

work weeks. Nevertheless, a nominal 40-hour week is an appropriate objective as an approximate average to be attained over a full shift rotation (i.e., 5-6 weeks of shift schedule designed in accordance with other guideline limits in the Policy). Such an objective provides assurance that shift schedules are designed in a manner consistent with the general intent of the Policy, which is to assure "to the extent practicable, personnel are not assigned to shift duties while in a fatigued condition that could significantly reduce their mental alertness or their decision making ability." The HBR2 normal shift schedule is consistent with the intent of the policy.

Based on its review, the staff concludes that the proposed amendment to the HBR2 TS is consistent with the working hour Policy as indicated in GL 82-12 and is, therefore, acceptable.

### 3.0 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.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment involves only changes in administrative procedures and requirements. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (55 FR 32324). 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 the amendment.

### 5.0 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.

Principal Contributor: D. Desaulniers

Date: December 30, 1992