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Serial: RNP-RA/02-0092

JUN 28 2002

Mr. Luis A. Reyes
Regional Administrator
United States Nuclear Regulatory Commission - Region II
Sam Nunn Atlanta Federal Center
61 Forsyth St.; S.W., Suite 23T85
Atlanta, Georgia 30303-8931

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

EXEMPTION REQUEST - OPERATOR REQUALIFICATION PROGRAM CYCLE

Dear Mr. Reyes:

In accordance with the provisions of the Code of Federal Regulations, Title 10 (10 CFR), Part 55.11, Carolina Power & Light (CP&L) Company is submitting a request for a one time exemption from the requirements of 10 CFR 55.59(a) that would allow the annual operating examination for the current requalification cycle to be given in the first quarter of 2003. This request was discussed between Ms. K. F. O'Donohue, NRC Region II, and Mr. G. W. Ludlam, CP&L, at NRC Region II headquarters in Atlanta, GA, on June 10, 2002.

The annual operating examination and comprehensive biennial written examination encompass the two-year requalification cycle from January 1, 2001 to December 31, 2002. 10 CFR 55.11 allows the NRC to grant specific exemptions from the requirements of 10 CFR 55. This request proposes a one time exemption from the requirements of 10 CFR 55.59(a) that would allow the current annual operating examination to be extended to 15 months (ending March 31, 2003), thereby allowing administration of the full annual examination in the first quarter of 2003.

The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Licensed Operator Requalification Program is scheduled to conduct the annual operating examination one month prior to the next refueling outage which is currently scheduled to begin in October 2002. Based on the training required for site procedures, modification of the simulator to support outage modifications, and training needed prior to the outage, site personnel would be challenged to complete the annual operating examination within the annual time frame.

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This request will allow HBRSEP, Unit No. 2, to align the annual operating examination and comprehensive biennial written examination to the same training week each year and not be impacted by future fall or spring outages. This exemption request deals only with extending the current annual cycle. Therefore, this request will not endanger life or property, nor is it contrary to the public interest. Granting of this one time exemption will not reduce the effectiveness of the Licensed Operator Regualification Program for HBRSEP, Unit No. 2.

If you have any questions concerning this matter, please contact Mr. C. T. Baucom.

Sincerely,



B. L. Fletcher III
Manager - Regulatory Affairs

PMY/pmy

c: Mr. Michael E. Ernstes, NRC, Region II
Document Control Desk, NRC
Mr. R. Subbaratnam, NRC, NRR
NRC Resident Inspector, HBRSEP