



Serial: RNP-RA/02-0121

OCT 11 2002

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

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

EXEMPTION REQUEST - OPERATOR REQUALIFICATION PROGRAM CYCLE

Ladies and Gentlemen:

On June 28, 2002, in accordance with the provisions of the Code of Federal Regulations, Title 10 (10 CFR), Part 55.11, Carolina Power and Light (CP&L) Company submitted a request for an exemption from the requirements of 10 CFR 55.59(c)(1). Based on subsequent discussions between the Nuclear Regulatory Commission (NRC) staff and CP&L, this letter is being submitted to supercede in its entirety the exemption request previously submitted on June 28, 2002. This exemption, if approved, will allow the annual operating examination for the current requalification cycle to be given in the first quarter of 2003, and will extend the current requalification cycle to the end of the first quarter of 2003.

The current annual operating examination and comprehensive biennial written examination encompass the two-year requalification cycle from January 1, 2001, to December 31, 2002. This request proposes an exemption from the requirements of 10 CFR 55.59(c)(1) that would allow the current annual operating examination to be extended to 15 months, and would extend the two-year requalification cycle to 27 months (both ending March 31, 2003), thereby allowing administration of the annual operating and biennial written examinations in the first quarter of 2003.

The H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Licensed Operator Requalification Program was scheduled to conduct the annual operating examination prior to the upcoming refueling outage that is scheduled to begin on October 12, 2002. HBRSEP, Unit No. 2, will implement a power uprate during the upcoming outage, and significant hardship would be imposed by completing the annual operating examination prior to the outage. The power uprate project, when combined with other refueling outage projects and modifications, has resulted in a significant workload relative to training on affected procedures and modifications to the plant-specific simulator. The added workload associated with the development and administration of the annual operating examination was found to be excessive and infeasible to accomplish. Additionally, the post-outage period between mid-November and year-end does not allow adequate time to complete the annual operating examination due to the need to complete outage-related assignments and post-outage operations schedule adjustments.

M003

The requested exemption would allow HBRSEP, Unit No. 2, to align the annual operating examination and comprehensive biennial written examination to the same training segment and will minimize the potential impacts associated with future fall and spring outages. This exemption request proposes only to extend the current annual operating examination cycle to 15 months and the current requalification cycle to 27 months, thereby aligning the examinations for the current cycle within the extended re-qualification cycle that is proposed. If this exemption request is approved, the successive cycle will begin on April 1, 2003, and will continue for a 24-month period. The successive annual and biennial examinations will be conducted within the 24-month period, as required.

The requested exemption will not endanger life or property, nor is it contrary to the public interest. The granting of this exemption will not reduce the effectiveness of the Licensed Operator Requalification 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 – Support Services

DJS/djs

c: Mr. L. A. Reyes, NRC, Region II
Mr. M. E. Ernstes, NRC, Region II
Mr. J. Munro, NRC, NRR
Mr. R. Subbaratnam, NRC, NRR
NRC Resident Inspector, HBRSEP