Progress Energy

PO Box 1551
411 Fayetteville Street Mall
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10 CFR 50.90

Serial: PE&RAS-08-037
October 6, 2008

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400/LICENSE NO. NPF-63

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

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT
DOCKET NO. 50-302/LICENSE NO. DPR-72

LICENSE AMENDMENT REQUEST TO ELIMINATE WORK HOUR CONTROLS TO SUPPORT COMPLIANCE WITH REVISED 10 CFR 26

Ladies and Gentlemen:

In accordance with the provisions of the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., and Florida Power Corporation (FPC), now doing business as Progress Energy Florida, Inc., hereby submit a request to amend the Technical Specifications (TS) for the facility operating licenses listed above. The TS for the stations listed above include working hour controls in the administrative controls section. The current requirements have been superseded by the requirements of 10 CFR 26, Subpart I, "Managing Fatigue," published March 31, 2008. Removal of work hour controls will support the requirement to be in compliance with 10 CFR 26, Subpart I, no later than October 1, 2009.

In accordance with 10 CFR 50.91(b), a copy of this license amendment request is being provided to the States of North Carolina, South Carolina, and Florida.

CP&L and FPC request that the proposed amendments be issued no later than May 1, 2009, to support implementation concurrent with implementation of the new 10 CFR 26, Subpart I requirements by October 1, 2009.

This letter contains one regulatory commitment as identified in Attachment 4.

A001
NRR

If you have additional questions, please call Donna Alexander at (919) 546-5357 or Brian McCabe at (919) 546-4579.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 10-6-08

Sincerely,

James Scarola

James Scarola
Senior Vice President and
Chief Nuclear Officer

dba

Attachment 1 – Licensees' Evaluation
Attachment 2 – Marked-up TS Pages
Attachment 3 – Revised TS Pages
Attachment 4 – List of Regulatory Commitments

cc w/att:

Luis Reyes, USNRC Regional Administrator – Region II
Ms. Farideh E. Saba, NRR Project Manager – BSEP, Unit Nos. 1 and 2; CR3
M. Vaaler, NRR Project Manager – SHNPP, Unit No. 1; HBRSEP, Unit No. 2
USNRC Resident Inspector – BSEP, Unit Nos. 1 and 2
USNRC Resident Inspector – CR3
USNRC Resident Inspector – SHNPP, Unit No. 1
USNRC Resident Inspector – HBRSEP, Unit No. 2
A. A. Gantt, Director, Bureau of Radiological Health (SC)
S. E. Jenkins, Manager, Radioactive and Infectious Waste Management Section (SC)
Attorney General (SC)
Beverly O. Hall, Section Chief, North Carolina Dept. of Environmental and Natural Resources
Chair, North Carolina Utilities Commission
Chair, Citrus Country Board of Commissioners
William A. Passetti, Chief, Div. of Environmental Health - Bureau of Radiation Control (FL)

Licensees' Evaluation

Licensees' Evaluation

1.0 Description

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., and Florida Power Corporation (FPC), now doing business as Progress Energy Florida, Inc., request amendments to the Facility Operating Licenses listed in the table below.

Station	Facility Operating License Nos.
Brunswick Steam Electric Plant, Unit Nos. 1 and 2	DPR-71 and DPR-62
Shearon Harris Nuclear Power Plant, Unit No. 1	NPF-63
H. B. Robinson Steam Electric Plant, Unit No. 2	DPR-23
Crystal River Unit 3 Nuclear Generating Plant	DPR-72

The Technical Specification (TS) of the Operating Licenses listed above currently include controls on working hours.

On April 17, 2007, the NRC Commissioners approved a final rule amending 10 CFR Part 26 which, among other changes, established requirements for managing worker fatigue at operating nuclear power plants. Subpart I specifically addresses managing worker fatigue by designating individual break requirements, work hour limits, and annual reporting requirements. Subpart I was published in the Federal Register (73 FR 16966) on March 31, 2008, with a required implementation period of 18 months. Compliance is, therefore, required by October 1, 2009.

2.0 Proposed Changes

The proposed changes remove work hour controls and/or references to NRC Generic Letter 82-12 from the Administrative control sections of the TS. CP&L and FPC are proposing to remove these work hour controls from the sections of their station's TS pages listed in the table below.

Station	TS Section
Brunswick Steam Electric Plant, Unit Nos. 1 and 2	5.2.2.e
Shearon Harris Nuclear Power Plant, Unit No. 1	6.2.2.f
H. B. Robinson Steam Electric Plant, Unit No. 2	5.2.2.e
Crystal River Unit 3 Nuclear Generating Plant	5.2.2.e

Licensees' Evaluation

3.0 Background

On June 15, 1982, the NRC issued GL 82-12, "Nuclear Power Plant Staff Working Hours," which was a revision of past guidance and discussions regarding the limitation of work hours to mitigate worker fatigue and the impact of fitness-for-duty on safety. GL 82-12 established overtime guidance for work hours beyond a "normal 8-hour day, 40-hour week." Issued prior to GL 82-12, GL 82-02, "Nuclear Power Plant Staff Working Hours," requested that all licensees revise the administrative section of their technical specifications to require that administrative procedures follow policy statement guidelines. GL 82-12 invoked this request and controls on worker fatigue were incorporated in the TS referenced above.

On April 17, 2007, the NRC Commissioners approved a final rule amending Title 10, Part 26, of the Code of Federal Regulations (CFR) which, among other changes, established requirements for managing worker fatigue at operating nuclear power plants. Subpart I specifically addresses managing worker fatigue by designating individual break requirements, work hour limits, and annual reporting requirements. Subpart I was published in the Federal Register on March 31, 2008, with a required implementation period of 18 months. Compliance is, therefore, required by October 1, 2009.

With the publication of 10 CFR Part 26, these work hour controls are no longer needed in the TS and may be deleted.

4.0 Technical Analysis

The new rule established by 10 CFR 26, Subpart I supersedes existing worker fatigue guidance.

10 CFR 26, Subpart I, distinguishes between work hour controls and fatigue management and strengthens requirements for both. Under the new rule, work hour controls include not only work hour limitations for 24-hour, 48-hour, and 7-day periods, but also include a required minimum break between work periods and varying required minimum days off. Additionally, Subpart I confines the use of waivers (deviations from controls) to situations where overtime is necessary to mitigate or prevent a condition adverse to safety or necessary to maintain the security of the facility. Subpart I also strengthens reporting requirements. Finally, the new rule's work hour controls scope includes operating and maintenance personnel, as well as those directing operating and maintenance personnel, performing work on risk-significant equipment, health physics and chemistry personnel who are a part of the on-site emergency response organization minimum shift complement, the fire brigade leader or advisor, and security personnel.

Licensees' Evaluation

The proposed changes remove working hour controls in the TS in order to support compliance with 10 CFR Part 26, Subpart I. Work hour controls and fatigue management requirements have been incorporated into 10 CFR 26, therefore, it is unnecessary to have work hour control requirements in the TS.

Removal of the plant-specific TS requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart I requirements.

5.0 Regulatory Analysis

5.1 No Significant Hazards Consideration

CP&L and FPC request amendments to the Facility Operating Licenses listed in the table below.

Station	Facility Operating License Nos.
Brunswick Steam Electric Plant, Unit Nos. 1 and 2	DPR-71 and DPR-62
Shearon Harris Nuclear Power Plant, Unit No. 1	NPF-63
H. B. Robinson Steam Electric Plant, Unit No. 2	DPR-23
Crystal River Unit 3 Nuclear Generating Plant	DPR-72

The proposed changes remove work hour controls and/or references to NRC GL 82-12 from the administrative controls section of the TS. These requirements have been superseded by the requirements of 10 CFR 26, Subpart I.

According to 10 CFR 50.92, "Issuance of amendment," paragraph (c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

(1) Involve a significant increase in the probability or consequence of an accident previously evaluated; or

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or

(3) Involve a significant reduction in a margin of safety.

Licensees' Evaluation

CP&L and FPC have evaluated the proposed changes to the TS for the stations listed above, using the criteria in 10 CFR 50.92, and have determined that the proposed changes do not involve a significant hazards consideration. The following information is provided to support a finding of no significant hazards consideration.

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed changes remove TS controls on working hours for personnel who perform safety related functions. The TS controls are superseded by the worker fatigue requirements in 10 CFR Part 26. Removal of the TS requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart I requirements. The proposed changes do not impact the physical configuration or function of plant structures, systems, or components (SSCs) or the manner in which SSCs are operated, maintained, modified, tested, or inspected. The proposed changes do not impact the initiators or assumptions of analyzed events, nor do they impact the mitigation of accidents or transient events.

Therefore, it is concluded that these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed changes remove TS controls on working hours for personnel who perform safety related functions. The TS controls are superseded by the worker fatigue requirements in 10 CFR Part 26. Work hours will continue to be controlled in accordance with NRC requirements. The new rule allows for deviations from controls to mitigate or prevent a condition adverse to safety or as necessary to maintain the security of the facility. This ensures that the new rule will not restrict work hours and thereby create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not alter plant configuration, require that new plant equipment be installed, alter assumptions made about accidents previously evaluated, add any initiators, or effect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected.

Licensees' Evaluation

Therefore, it is concluded that this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No

The proposed changes remove TS controls on working hours for personnel who perform safety related functions. The TS controls are superseded by the worker fatigue requirements in 10 CFR Part 26. The proposed changes do not involve any physical changes to plant or the manner in which plant systems are operated, maintained, modified, tested, or inspected. The proposed changes do not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed changes will not result in plant operation in a configuration outside the design basis. The proposed changes will not adversely affect systems that respond to safely shutdown the plant and to maintain the plant in a safe shutdown condition.

Removal of plant-specific TS administrative requirements will not reduce a margin of safety because the requirements in 10 CFR Part 26 are adequate to ensure that worker fatigue is managed. Therefore, it is concluded that these changes do not involve a significant reduction in a margin of safety.

Based upon the above, CP&L and FPC conclude that the proposed amendments present no significant hazards consideration under the standards set forth in 10 CFR 50.92 (c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements and Criteria

The proposed change eliminates the plant-specific TS administrative controls on working hours. The TS guidance has been superseded by 10 CFR Part 26.

10 CFR Part 26, Subpart I, "Managing Fatigue," contains requirements for managing worker fatigue at operating nuclear power plants.

10 CFR 50.36 (d)(5), "Administrative controls," provides the regulatory requirements for the content required in the administrative controls section of TS. Requirements to control working hours and manage fatigue are not required to be in the Administrative Controls by 10 CFR Part 50.36. Because the requirement to control working hours and

Licensees' Evaluation

manage fatigue is now provided in 10 CFR Part 26, Subpart I, it is unnecessary for the TS to contain similar controls.

Based on the considerations discussed above, (1) there is a 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 NRC's regulations; and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

6.0 Environmental Consideration

A review has determined that the proposed amendments are administrative in nature and do not change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, and do not change an inspection or surveillance requirement. The proposed amendments do not involve (1) a significant hazards consideration, (2) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (3) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendments meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9).

Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendments.

7.0 References

(1) NRC Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours," dated June 15, 1982

(2) VR-SECY-06-0244, "Final Rulemaking -10 CFR Part 26 - Fitness-for-Duty Programs," dated April 17, 2007

(3) Federal Register, Vol. 73, No. 62, p. 16966, "Fitness for Duty Programs," dated March 31, 2008

(4) NRC Generic Letter 82-02, "Nuclear Power Plant Staff Working Hours," dated February 8, 1982

U. S. Nuclear Regulatory Commission
Attachment 2 to Serial: PE&RAS 08-037
Marked-up Technical Specification Pages
6 Pages (including cover page)

Station Technical Specifications	Affected Pages
Brunswick Steam Electric Plant, Unit Nos. 1 and 2[1]	5.0-3
Shearon Harris Nuclear Power Plant, Unit No. 1	6-2
H. B. Robinson Steam Electric Plant, Unit No. 2	5.0-3, 5.0-4
Crystal River Unit 3 Nuclear Generating Plant	5.0-3

[1] Since TS 5.2.2.e for Unit 1 and Unit 2 are identical, only the mark-up for Unit 2 is provided.

5.2 Organization

5.2.2 Facility Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, when either unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room. With one unit in MODE 1, 2, or 3 and the other unit defueled, the minimum shift crew shall include a total of two SROs and two ROs.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. ~~[illegible] be developed and implemented to limit [illegible] who perform safety-related functions ([illegible]ROs, health physicists, auxiliary operators, and key maintenance personnel). These procedures shall meet the working hour guidelines published by the Nuclear Regulatory Commission in Generic Letter 82-12.~~

Deleted

f. The operations manager or assistant operations manager shall hold an SRO license.

g. The shift technical advisor shall serve in an advisory capacity to the shift superintendent on matters pertaining to the engineering aspects assuring safe operation of the unit when either unit is in MODE 1, 2, or 3.

UNIT STAFF (Continued)

f. Deleted by Amendment No.

~~ed and implemented to perform safety-related , licensed Operators, d key maintenance~~

~~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.~~

~~5. STAs are allowed to work a maximum of 84 hours in any 7-day period, excluding shift turnover time, while on their special rotation schedule.~~

~~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.~~

5.2 Organization

5.2.2 Unit Staff (continued)

operator shall be assigned to the shift crew while the unit is operating in MODES 1, 2, 3, or 4.

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specification 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified as a radiation control technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. ~~A~~ Deleted ~~be developed and implemented ... unit staff who perform safety ... sed SROs, licensed ROs, ... xiliary operators, and key maintenance personnel).~~

~~Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a 12 hour day, nominal 40 hour week while the unit is operating. 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;~~

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

~~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 in advance by the Plant Manager or his designee, in accordance with approved administrative procedures, or by 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 Manager or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.~~

f. The Operations Manager or Superintendent in charge of the operations shift crews shall hold an SRO license.

g. During MODES 1, 2, 3, and 4, the shift technical advisor (STA) shall provide advisory technical support to the SSO with regard to the safe operation of the unit. If an individual that holds an SRO license also meets the STA requirements, that individual may act in both capacities.

5.2 Organization

5.2.2 Unit Staff (continued)

an additional auxiliary nuclear operator shall be assigned in MODES 1, 2, 3 and 4.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

d. An individual qualified in Radiation Protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. ~~The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with approved administrative procedures.~~

U. S. Nuclear Regulatory Commission
Attachment 3 to Serial: PE&RAS 08-037
Revised Technical Specification Pages
7 Pages (including cover page)

Station Technical Specifications	Affected Pages
Brunswick Steam Electric Plant, Unit Nos. 1 and 2	5.0-3
Shearon Harris Nuclear Power Plant, Unit No. 1	6-2
H. B. Robinson Steam Electric Plant, Unit No. 2	5.0-3, 5.0-4
Crystal River Unit 3 Nuclear Generating Plant	5.0-3

5.2 Organization

5.2.2 Facility Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, when either unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room. With one unit in MODE 1, 2, or 3 and the other unit defueled, the minimum shift crew shall include a total of two SROs and two ROs.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Deleted

f. The operations manager or assistant operations manager shall hold an SRO license.

g. The shift technical advisor shall serve in an advisory capacity to the shift superintendent on matters pertaining to the engineering aspects assuring safe operation of the unit when either unit is in MODE 1, 2, or 3.

5.2 Organization

5.2.2 Facility Staff (continued)

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, when either unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room. With one unit in MODE 1, 2, or 3 and the other unit defueled, the minimum shift crew shall include a total of two SROs and two ROs.

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e. Deleted

f. The operations manager or assistant operations manager shall hold an SRO license.

g. The shift technical advisor shall serve in an advisory capacity to the shift superintendent on matters pertaining to the engineering aspects assuring safe operation of the unit when either unit is in MODE 1, 2, or 3.

UNIT STAFF (Continued)

f. Deleted by Amendment No.

5.2 Organization

5.2.2 Unit Staff (continued)

operator shall be assigned to the shift crew while the unit is operating in MODES 1, 2, 3, or 4.

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specification 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified as a radiation control technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Deleted

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

f. The Operations Manager or Superintendent in charge of the operations shift crews shall hold an SRO license.

g. During MODES 1, 2, 3, and 4, the shift technical advisor (STA) shall provide advisory technical support to the SSO with regard to the safe operation of the unit. If an individual that holds an SRO license also meets the STA requirements, that individual may act in both capacities.

5.3 Organization

5.2.2 Unit Staff (continued)

an additional auxiliary nuclear operator shall be assigned in MODES 1, 2, 3 and 4.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

d. An individual qualified in Radiation Protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

The following table identifies those actions committed by CP&L and FPC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Commitment	Schedule
Removal of the plant-specific TS requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart I requirements.	This commitment will be completed no later than October 1, 2009.