



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 70 TO FACILITY OPERATING LICENSE NO. DPR-23

CAROLINA POWER AND LIGHT COMPANY

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

DOCKET NO. 50-261

1.0 Introduction

By letter dated July 10, 1981, Carolina Power and Light Company (the licensee) requested changes to the Appendix A Technical Specifications appended to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2. The proposed change would revise the Administrative Controls Section of the Technical Specifications to reflect corporate organizational changes, plant organizational changes, and changes in the Plant Nuclear Safety Committee (PNSC).

In support of the proposed change the licensee stated that:

The proposed change for the procedure review and approval process is consistent with that recommended by Regulatory Guide 1.33 and ANS/ANSI N3.2.

The proposed change to the PNSC will provide a more defined program of review and overview of the facility operation.

2.0 Discussion and Evaluation

Our evaluation of the licensee's proposed Technical Specifications is presented below. We have retained the format of the Technical Specifications in order to clarify our evaluation.

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## 6.2 Organization

6.2.1 Offsite (Corporate) - The revised corporate report organization (TS Figure 6.2-1) is the same organization that was reviewed and found acceptable in conjunction with our evaluation of the organization and management of the Carolina Power and Light Company for operation of the Shearon Harris Nuclear Power Plant. Therefore, the offsite organization changes are found acceptable.

6.2.2 Onsite (Facility) - The revised TS Figure 6.2-2 for the new Robinson plant staff organization is similar but not identical to the proposed Shearon Harris plant staff organization discussed above.

Shearon Harris has a Manager, Environmental and Radiation Control; a Manager, Maintenance; and a Manager, Operations reporting to a Manager, Plant Operations who, in turn, reports directly to the General Manager. Robinson does not use the position of Manager, Plant Operations but instead combines the positions of Manager, Maintenance and Manager, Operations into a single position with the title Manager, Operations and Maintenance who reports directly to the General Manager.

The Manager, Environmental and Radiation Control, was changed to report directly to the General Manager in the Robinson organization. This change is in accordance with the criteria of NUREG-0731, "Criteria for Utility Management and Technical Competence," and Regulatory Guide 8.8, Section C.1.b(3).

We find that these differences are due to the fact that the Robinson plant staff is organized to support only one unit whereas the Shearon Harris plant staff is organized to support several units. We conclude that the Robinson plant staff as shown in proposed TS Figure 6.2-2 is acceptable.

6.2.2.a - The licensee proposes to change the required number of Control Operators (licensed Reactor Operators) listed in the TS from two to three and to add the requirement that a Shift Technical Advisor be included in the minimum shift complement. This change documents in the TS these two post-TMI requirements that have already been implemented by the licensee.

### Section 6.3 Facility Staff Qualifications

The licensee proposes to add a Section 6.3.3 to specify Shift Technical Advisor qualification requirements. The proposed wording for this new section is consistent with the current NRC requirements for Shift Technical Advisor requirements and is acceptable.

### 6.4 Training

6.4.1 - The licensee proposed to delete the statement that specifies under whose direction the training program for facility staff shall be maintained.

6.4.2 - The licensee proposed to delete the statement that specifies under whose direction the training program for the Fire Brigade shall be maintained.

We believe that it is important to specify under whose direction these programs are to be maintained so that it can be assured that appropriate management direction of these programs is implemented. We concluded that the proposed deletion was unacceptable. However, during telephone discussions, the licensee agreed to retain the statement specifying the members of management under whose direction these programs are to be maintained.

## 6.5 Review and Audit

The licensee proposed to eliminate the current TS requirements for review of certain activities by the Plant Nuclear Safety Committee (PNSC). It also proposes that some, but not all, of the review requirements that are eliminated from the required list of PNSC reviews will be assigned to other plant staff personnel. In order to specify these revised review requirements, the licensee proposed to extensively modify and restructure TS Section 6.5, Review and Audit. It also proposed to eliminate TS Section 6.8, Procedures and to provide all requirements concerning procedures in Section 6.5. Whereas Section 6.5.1 of the current TS describes the Plant Nuclear Safety Committee (PNSC) and lists 10 specific items (items 6.5.1.7a-j) of review responsibility, the proposed change reorganizes Section 6.5 around and to provide specific and more detailed requirements related to the preparation, review and approval of the following activities:

Procedures, Tests and Experiments (New Section 6.5.1.1)

Modifications (New Section 6.5.1.2)

Technical Specification and License Changes (New Section 6.5.1.3)

Review of Technical Specification Violations (New Section 6.5.1.4)

### 6.5.1 Plant Nuclear Safety Committee (PNSC)

The licensee proposes to place this PNSC information in new Section 6.5.1.6.

6.5.1.1 Purpose - The licensee proposed to place the purpose description in new Section 6.5.1.6.1a, and to delete the current statement that the PNSC is chaired by the General Manager and composed of supervisory personnel. New Section 6.5.1.6.2 lists the Plant General Manager as the PNSC Chairman and lists the QA Director and Managers reporting directly to the Plant General Manager as members. We conclude that the deleted statement was redundant and its deletion is acceptable.

6.5.1.2 Composition - The licensee proposed to place this information in new Section 6.5.1.6.2 and to change the organization and composition of the PNSC to use a new administrative structure and to reflect its revised plant organization and position titles. The licensee proposes to:

- eliminate the position of Vice Chairman
- designate the Administrative Supervisor as PNSC Secretary
- designate the Director QA/QC and the four managers that report directly to the General Manager and their designated alternates as members
- eliminate the Training Supervisor from the list of members.

The other disciplines and functions currently included in the membership continue to be represented in the proposed membership but at a higher management level.

We find that the proposed PNSC membership is similar to those previously and currently approved by the NRC at other nuclear plants and is acceptable.

6.5.1.4 Consultants - The licensee proposes to delete the information in this section which states consultants shall be utilized as determined by the PNSC Chairman. We do not believe this statement is necessary or needed and find its deletion acceptable.

6.5.1.6 Quorum - The current quorum required by this section is four members. The licensee proposes to place this quorum information in new Section 6.5.1.6.5 and to retain this same quorum of four members. We note that for most plants the current quorum requirement is five members. However, it is not our practice to require that licensees modify their TS to meet the latest, most recently developed, or more stringent requirements each time they request a TS change. Since the current quorum requirement for Robinson is four members, we accept this same quorum in the revised TS.

6.5.1.7 Responsibilities - The licensee has proposed in new Section 6.5.1.1 on Procedures, Tests and Experiments and 6.5.1.2 on Modifications to specify a new requirement that a two-party review be performed prior to approval of

procedures, tests, experiments and plant modifications. This two-party review will provide a written safety analysis including a determination of whether or not the activity involves a change in the facility as described in the FSAR, a change to the TS or constitutes an unreviewed safety question.

The current TS Sections 6.5.1.7a, b and d specify that the PNSC be responsible for review of all proposed procedures, tests, experiments and plant modifications that affect nuclear safety. The licensee has proposed that procedures, tests, experiments and plant modifications that do not constitute an unreviewed safety question need not be reviewed by the PNSC. It proposed instead to require only the two-party review as discussed above and require approval prior to implementation by (1) the Plant General Manager or the Manager of the functional areas affected in the case of procedures, tests and experiments and by (2) the Plant General Manager or the Manager of Technical Support in the case of plant modifications.

It has also proposed that in the absence of any of these three, an alternate designated in writing by the Plant General Manager could approve these activities prior to implementation.

It is acceptable to us to have all of the currently required onsite review and investigative functions handled by a single committee (PNSC) as required by the current TS or to have only parts of the onsite review and investigative functions performed by a committee and the remainder performed by plant organizational units or personnel as is being proposed by the licensee.

However, we require that:

1. the qualifications of the personnel performing the review shall, as a minimum, meet the qualification requirements for professional-technical personnel specified by Section 4.4 of ANSI N18.1-1971
2. the participants shall collectively possess the background and qualifications in the subject matter under review to provide a comprehensive, inter-disciplinary review
3. the Plant General Manager shall be responsible to review and approve the reports and recommendations developed by the reviewers and forward them to the independent review group. We recognize that in order to fulfill this responsibility, the Plant General Manager may delegate some of these activities to other specific appropriate plant staff managers. This delegation must be in writing and specific to the particular review activity being performed.

We found that the proposed changes to the Robinson TS, as submitted by the licensee in its July 10, 1981 letter to the NRC did not adequately address all of these three requirements.

#### Requirement 1

By telephone communication the licensee subsequently agreed to modify its new Section 6.5.1.5.1 to state that individuals designated for the two-party safety reviews shall have a Bachelor of Science in engineering or related field or equivalent and two years related experience. This requirement meets



or exceeds the minimum qualifications specified in Section 4.4 of ANSI-N18.1-1971 and therefore is acceptable. The members of the PNSC are plant managers who are required to meet the qualifications for their particular management position as specified by Sections 4.2.1, 4.2.2, 4.2.3 and 4.2.4 of ANSI-N18.1-1971 and are therefore acceptable.

We also found that the proposed specification did not directly address the minimum qualification requirements for alternates to the PNSC. The licensee has informed us orally that it tries to appoint alternates who meet the qualification requirements for the management position held by the member for whom they serve. However, the licensee subsequently agreed to add the following statement to the licensee's proposed new Section 6.5.1.6.3:

"Alternates shall as a minimum meet the qualifications specified for professional-technical personnel in Section 4.4 of ANSI-N18.1-1971."

We find this addition acceptable.

#### Requirement 2

The proposed sections on two-party review do not address the need to assure that reviewers collectively possess the qualifications in the subject matter under review to provide a comprehensive interdisciplinary review. However, during subsequent telephone communications the licensee agreed to add the following statement to the proposed new Sections 6.5.1.1.4 and 6.5.1.2.3:

The Plant General Manager or other designated manager approving the review activities of the two-party review shall assure that the reviewers collectively possess the background and qualifications in all of the disciplines necessary and important to the specific review. To assure that the individuals selected for the two-party review are qualified and have the background necessary, the Plant General Manager shall approve and maintain a list of qualified persons. Included in this list will be individuals in addition to the first and second party reviewers whose expertise may be necessary during the review to 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.

We conclude this addition acceptable.

Requirement 3

We find the licensee's proposal in new Section 6.5.1.4b that procedures, tests and experiments be approved by the "manager of the functional area affected by the procedures, tests, or experiments" appears to leave it up to the manager to decide if he or she is the approval authority for the case in point. We believe that the subject matter that is to be approved by each manager should be previously specified by the Plant Manager. Therefore, we require that the following statement be added to new Section 6.5.1.1.4b: "as previously designated by the Plant General Manager." We have added this statement in Attachment 1.

The licensee, by telephone communication, has subsequently proposed to modify new Sections 6.5.1.1.4a and 6.5.1.2.3a to add that the designated alternate to the Plant General Manager may approve two-party reviews. It has also agreed to delete new Sections 6.5.1.4c and 6.5.1.2.3c concerning appointment of alternates. We conclude that this change is acceptable.

The current TS Section 6.5.1.7e specified that the PNSC is responsible for investigation of all violations of TSs. The licensee proposed to delete both (1) the requirement that all violations of TSs be investigated and (2) the requirement that the PNSC is responsible for the investigation of TS violations. The licensee proposed instead, in new Section 6.5.1.4.1, to require investigation of only those TS violations that (1) require 24-hour reports to the NRC or (2) involve safety limit violations. It also proposed that reports of these investigations be approved by the General Manager or his designee. It did not state who performs the investigation or prepares the reports.

Deletion of the requirement for investigation of all TS violations is not acceptable. We require that all TS violations be investigated and that a report covering the evaluation and recommendations to prevent recurrence be prepared and submitted to the Manager - Corporate Nuclear Safety (independent review group) and to the Vice President - Nuclear Operations.

The licensee has subsequently informed us, by telephone communication, that it is (1) modifying its proposed Sections 6.5.1.4.1 and 6.5.1.6.6 to require that the PNSC perform a review of all violations to TSs. With these modifications we conclude that the proposed TSs require appropriate review of all TS violations and are acceptable.

The current TS Section 6.5.1.7f specifies that the PNSC is responsible for the review of facility operations to detect potential safety hazards. The licensee proposed to delete the requirement for review of facility operations

Section 6.6.1b that each reportable occurrence requiring 24-hour notification to the NRC shall be reviewed instead by the General Manager. The licensee subsequently informed us by telephone communication that it is modifying its proposal to reinstate the requirement that the PNSC review all events requiring a 24-hour report to the NRC as Section 6.5.1.6.6.e. Therefore we find this acceptable.

6.5.1.8 Authority - The licensee propose to delete the statement in current Section 6.5.1.8b that the PNSC recommend approval or disapproval of proposals reviewed under items 6.5.1.7a through d. It also propose to change the requirement in current Section 6.5.1.8b that the Vice President - Nuclear Operations and the Manager - Corporate Nuclear Safety be notified "immediately" of disagreements between the PNSC and the General Manager to notification within 24 hours.

The deletion of the requirement that the PNSC recommend approval or disapproval to the General Manager is of no consequence since the PNSC will in any event make the results of its review known to the General Manager, who is Chairman of the PNSC, and he will approve or disapprove them. Therefore, this deletion is acceptable. We find that "within 24 hours" is a reasonable time frame for advising corporate management of disagreements between the PNSC and the General Manager and conclude that this change is acceptable.

The licensee proposes to delete the requirement of current Section 6.5.1.8c that the PNSC shall make determinations as to whether or not proposals considered by the PNSC involve unreviewed safety questions. The licensee relies instead on requiring that this evaluation be performed as a part of the two-party review of all proposals.

In our discussion above of current Section 6.5.1.7 (Responsibilities), we stated that it is acceptable to have parts of the onsite review functions performed by plant organizational units or plant personnel as proposed by the licensee. Therefore, we conclude that it is acceptable to delete the requirement that the PNSC make such determinations and have it performed as part of the proposed two-party review of all proposals.

6.5.1.9 Records - The licensee did not propose any change to the current requirements for records which is now included in new Section 6.5.1.6.8.

6.5.1.10 Procedures - The licensee proposes to delete the current statement in Section 6.5.10 that written administrative procedures for PNSC operation be prepared and maintained. The licensee has informed us orally that it has retained the requirement that procedures for the PNSC (and for other review activities as well) be prepared and maintained through proposed TS Section 6.5.1.1.1 which requires that procedures listed in Appendix A to Regulatory Guide 1.33, Revision 2, February 1978 be established, implemented and maintained. The licensee has informed us orally that it interprets items 1c and 1h of this Appendix A as requiring procedures for the PNSC

and all other review processes, including the newly proposed two-party review of procedures, tests, experiments and modifications. We agree with the licensee, and therefore, conclude that deletion of the statement in current Section 6.5.10 is acceptable.

#### 6.5.2 Corporate Nuclear Safety and Quality Assurance Audit Section (CNS and OAAS)

In reorganizing the corporate support organization, the licensee has, as shown in their proposed Figure 6.2.1, separated the corporate quality assurance function from the corporate safety and research function. The licensee proposed to modify the current Sections 6.5.2, 6.5.3, and 6.5.4 concerning independent review and audit to reflect this change.

6.5.2.1 - The licensee proposed to eliminate discussion of the audit function from this section and describe only the responsibilities of the Manager - Corporate Nuclear Safety (CNS) for administering the independent review function. The licensee proposed to delete the listing in current Section 6.5.3.3 of the subjects required to be reviewed by the Corporate Nuclear Safety Unit and restate these in new Section 6.5.2.1d as subjects for which the Manager CNS is responsible for assuring independent review. The modification deletes the current Section 6.5.2.1e which states the Manager's responsibility for distribution of reports and other records. We find that requirements for distribution are adequately covered in new Section 6.5.2.2 on followup action and conclude that deletion of Section 6.5.2.1e is acceptable.

### 6.5.3 Corporate Nuclear Safety Unit

6.5.3.1 - The licensee proposes to move the statement concerning the requirement that the Corporate Nuclear Safety Unit shall provide the independent offsite review to new Section 6.5.2, and reflect that this organization is now called the Corporate Nuclear Safety Section.

6.5.3.2 Personnel - The licensee proposes to move the information in this section to new Section 6.5.2.3. The only change proposed in the requirements is the deletion of the requirement in Section 6.5.3.2.6.2 that reviewers' experience include three years involvement with operation and/or design of nuclear power plants. With this deletion, the requirement reads "Bachelor of Science in Engineering or related field or equivalent and five years related experience" which is similar to that required for independent reviewers in the TSs for other plants that use a functional organization rather than a committee to perform the independent reviews. We do not currently impose a requirement on new licensees that reviewers involved in independent review activities have three years involvement with operation and/or design of nuclear plants, and on this basis, we conclude that the deletion of this requirement from the Robinson TS is acceptable.

6.5.3.3 Subjects Requiring Independent Review - As discussed above for current Section 6.5.2.1, the subjects requiring independent review are described under the Manager CNS's responsibilities in new Section 6.5.2.1d.

6.5.3.4 Followup Action - The licensee proposes to move the information and requirements in this current section to new Section 6.5.2.2 and change the organizational titles to reflect the new organization.

#### 6.5.4 Quality Assurance Audit, Operation and Maintenance Unit

The information and requirements in this current section have been transferred with minimal change to new Section 6.5.3 entitled Performance Evaluation Unit. This new section is entitled Audit to parallel the title of new Section 6.5.2, Independent Review.

6.5.4.1 - This section describes the audits that were the assigned responsibility of the old Operation and Maintenance Unit and are now shown by the licensee in proposed new Section 6.5.3.1 as assigned to the Performance Evaluation Unit. The licensee agreed by telephone to modify the structure of proposed new Section 6.5.3.2 to parallel that of new Section 6.5.2.1 and to list the performance evaluation unit manager's (Principal QA Specialist's) responsibilities that are listed in current TS Section 6.5.2.1, e.g., approves selection of individuals to conduct QA audits. We conclude this change is acceptable.

The licensee proposes to change the wording concerning frequency of audits as follows:

- 1) change items 6.5.4.1a and b from "at least once per year" to "at least once per 12 months"
- 2) change item 6.5.4.1d from "at least once per two years" to "at least once per 24 months"
- 3) change item 6.5.4.1f from "at least once per 12 months" to "at least once per 24 months"

This wording and the proposed frequency of the audits is consistent with the NRC current Standard Technical Specifications and is acceptable.



6.5.4.2a - The only proposed change to this section is to renumber it as new Section 6.5.3.2a.

6.5.4.2b - In addition to proposing to renumber current Section 6.5.4.2b as new Section 6.5.3.3b, the licensee proposed to add a new statement as follows: "Individuals performing the audits may be members of the audited organization; however, they shall not audit activities for which they have immediate responsibility, and while performing the audit, they shall not report to a management representative who has immediate responsibility for the activity audited." - We have discussed this with QAB and have concluded that the addition is acceptable.

6.5.4.3 Reports - The licensee proposed to renumber this as new Section 6.5.3.3. It also proposes that the results of the audit shall be approved by the Principal QA Specialist - Performance and Evaluation Unit. The Principal QA Specialist is not a "management level" position in the licensee's organization. However, the Principal QA Specialist reports directly to the Manager, Corporate Quality Assurance, is the leader of the Performance Evaluation Unit, and manages its activities. We conclude, therefore, that approval of audit results by the Principal QA Specialist is acceptable.

The licensee also proposed to delete the requirement that the audit results be sent directly to the President/Chief Executive Officer. The licensee proposed to send audit results directly to the Executive Vice President - Power Supply and Engineering and Construction. This Executive Vice President has overall

responsibility for all of the Robinson operation and technical support activities and all corporate nuclear activities. On this basis, we conclude that it is acceptable to delete the requirement that audit results be sent directly to the President/Chief Executive Officer.

6.5.4.4 - No changes proposed except to renumber as new Section 6.5.3.4.

#### 6.5.5 Fire Protection and Loss Prevention

The licensee proposes to renumber this section as new Section 6.5.4 and retitle it "Outside Agency Inspection and Audit Program."

The applicant proposed in new Section 6.5.4.2 to change the current Section 6.5.5.2 requirement for frequency of audit of the fire protection and loss program from "at intervals no greater than three years" to "at least once per 36 months."

We believe that the original wording "at intervals no greater than three years" which is also the wording used in the current Standard Technical Specification is more definitive and less subject to differing interpretations. The licensee has subsequently agreed by telephone communication to reinstate this original wording.

#### 6.6 Reportable Occurrence Action

The licensee proposed to modify the requirement of the current Section 6.6.1b to address "Reportable Occurrences that require 24-hour notification to the NRC" and to state that these shall be reviewed by the General Manager. This proposed modification is unacceptable in that it infers that only the General

Manager is required to review these reports. As discussed above regarding Section 6.5.1.7, we require that events requiring 24-hour reports to the NRC be reviewed by the PNSC or by two or more other appropriate qualified professional-technical personnel and the General Manager. The licensee has subsequently agreed by telephone communication to modify its proposed Section 6.6.1b to retain the current requirement that these events be reviewed by the PNSC.

#### 6.7 Safety Limit Violation

Actions to be taken in the event of a Safety Limit is violated remain as previously approved and are acceptable.

#### 6.8 Procedures

The licensee has eliminated Section 6.8 and has incorporated all of its requirements with modifications in proposed new Section 6.5.1.

6.8.1 - The licensee proposed in new Section 6.5.1.1.1 to modify the current Section 6.8.1 requirements such that they are consistent with the current requirements of the NRC's Standard Technical Specifications. We conclude, therefore, that this modification is acceptable.

6.8.2 - This section currently requires that proposed procedures be reviewed by the PNSC and approved by the General Manager. As discussed above in our Section 6.5.1.7, the applicant proposed to change the requirement such that only procedures and changes thereto that involve unreviewed safety questions require review by the PNSC. Our evaluation of this proposal is discussed above in Section 6.5.1.7.

6.8.3 - This section currently deals with the requirements concerning temporary changes to procedures. The requirements of this section are incorporated with the following proposed changes in new Section 6.5.1.1.5:

- deletion of requirement for review by PNSC and approval of General Manager within three weeks of implementation
- addition of a specific statement that temporary changes will be incorporated as a permanent change or deleted within 21 days of receiving temporary approval.

We require that either the PNSC or other qualified professional-technical personnel, as discussed above concerning proposed changes to current TS Section 6.5.1.7, perform the reviews currently specified for the PNSC. The licensee has subsequently agreed by telephone to modify its proposed Section 6.5.1.1.5 to state that temporary changes shall be reviewed in accordance with specifications 6.5.1.1.2, 6.5.1.1.3, and 6.5.1.1.4 (which specify a two-party review with approval by the General Plant Manager or another designated Manager). We find that the added statement concerning incorporation or deletion of the temporary changes clarifies the current TS and is acceptable.

#### 6.9 - Reporting Requirements

#### 6.10 - Record Retention

These sections contain minor changes that were made mainly to be consistent with changes made in the previous sections. Therefore we conclude that these changes are acceptable.

### 3.0 Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

### 4.0 Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: June 28, 1982