January 16, 1990

Docket No. 50-261

MEMORANDUM FOR: Luis Reyes, Director
                  Division of Reactor Projects
                  Region II

FROM: Charles W. Hehl, Acting Assistant Director
                     for Region II Reactors
                  Division of Reactor Projects I/II

SUBJECT: REQUEST FOR ASSISTANCE IN ADDRESSING ISSUES REGARDING THE
                  H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2, (ROBINSON)
                  TECHNICAL SPECIFICATION 6.2.3 ON OVERTIME POLICY
                  (TAC NO. 74814)

We have completed the review on the subject request dated September 11, 1989.
We conclude that the licensee for Robinson should initiate action to comply
with the guidance of Generic Letter 82-12.

Enclosure 1 is a memorandum from William H. Regan to Elinor G. Adensam
addressing the subject request. Basically, our review concurs with the
Operational Safety Team Inspection findings regarding the differences between
the NRC guidance in Generic Letter (GL) 82-12 and the licensee's overtime policy.
With regard to the historical profile of Robinson's overtime policy, we
particularly note that on September 12, 1985 the NRC approved the licensee's
Technical Specification (TS) revision. The revised TS were based on NUREG-0737
guidance (issued in 1980) which was revised and superseded by the staff's
guidance of GL 82-12 issued in 1982. The most expedient way for changes to be
made in the Robinson overtime policy would be for the Robinson licensee to
voluntarily initiate changes for compliance with the GL 82-12 guidance.
Ronnie Lo has discussed these issues with the licensee and the enclosed
memorandum (Enclosure 2) indicates that the licensee is progressing toward
a satisfactory resolution.

                              Original Signed By:

                              Charles W. Hehl, Acting Assistant Director
                                 for Region II Reactors
                              Division of Reactor Projects I/II

Contact: R. Lo
         49-21463
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