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SUBJECT: Application for amend to license DPR-23,requesting rev to TS allowing implementation of functional role & responsibilities of nuclear assessment dept.

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CP&L
Carolina Power & Light Company
P.O. Box 1551 • Raleigh, N.C. 27602

SEP 15 1993

H. W. HABERMEYER, JR.
Vice President
Nuclear Services Department

SERIAL: GLS-93-169

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

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

REQUEST FOR LICENSE AMENDMENT - NUCLEAR ASSESSMENT DEPARTMENT FUNCTIONAL CHANGES

Gentlemen:

By letter dated August 10, 1992, Carolina Power & Light Company (CP&L) requested a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). That proposed amendment was to allow implementation of the functional role and responsibilities of the Nuclear Assessment Department (NAD).

Subsequent discussions with the NRC regarding that submittal provided valuable information in support of the requested changes. This letter provides a revised submittal incorporating the results of these discussions.

Enclosures 1A and 1B provide a summary of differences from the initial submittal and the revised description of the proposed changes, with the basis for the changes.

Enclosure 2 provides CP&L's initial basis for determination that the proposed changes do not involve a significant hazards consideration. This determination remains valid for this revised submittal.

Enclosure 3 provides CP&L's initial basis for determination that the proposed changes require no environmental assessment. This determination remains valid for this revised submittal.

Enclosure 4 provides the page change instructions.

Enclosure 5 provides the proposed TS pages.

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Please refer any questions regarding this submittal to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,

H. W. Habermeyer, Jr.

DBB/jbw

Enclosures

cc: Mr. S. D. Ebneter
Ms. B. L. Mozafari
Mr. W. T. Orders
Mr. Heyward G. Shealy (SC)

H. W. Habermeyer, Jr., having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Eleanor C. Chappell
Notary (Seal)

My commission expires: 2/6/96

ELEANOR C. CHAPPELL NOTARY * * * PUBLIC WAKE COUNTY, N.C.

ENCLOSURE 1A

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 261/OPERATING LICENSE NO. DPR -23
NUCLEAR ASSESSMENT DEPARTMENT FUNCTIONAL CHANGES

RESUBMITTAL CHANGE SUMMARY

Four items are being withdrawn from the original submittal.

1. T.S.6.5.1.6.6 of the original submittal is being withdrawn. This item will remain as is in the approved Technical Specifications.

2. T.S.6.10.2 is being withdrawn. This item relating to Quality Assurance (QA) records will remain as is in the approved Technical Specifications. The list of records will be restructured for clarity.

3. T.S.6.5.1.6.7 is being withdrawn. This was deleted from BSEP and HNP submittals originally and inadvertently left in the RNP submittal. This will remain as currently approved.

4. T.S.6.5.2.3.a has the word "significant" as a modifier to the list of items reviewed by the independent review group removed.

Three items are being clarified based on organizational changes and/or comments by NRC reviewers.

1. T.S.6.5.2.2.5 (proposed) has been clarified to state that multiple reviews will take place if necessary to ensure all applicable disciplines are covered when performing independent reviews.

2. T.S.6.5.3 has been revised to include the list of areas that will be assessed by NAD. Reference to Section 17.3.3 of the FSAR provides the details of the Assessment Program.

3. T.S.6.5.2.4.c (proposed) has been revised to show the current organizational titles applicable to this item.

ENCLOSURE 1B

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/OPERATING LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT FUNCTIONAL CHANGES

BASIS FOR CHANGE REQUEST

Proposed Changes:

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which performs internal evaluations and assessment activities and serves as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those deficiencies which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and to ensure effective correction of deficiencies. The NAD has assumed the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities; and (2) the independent assessment of unit activity.

As CP&L continues to emphasize that quality is the primary responsibility of the line organization, the NAD uses more performance-based methods to evaluate the attainment of quality. This proposed change is submitted to allow the NAD greater freedom to concentrate resources on performance issues and improvements.

The proposed change meets the CP&L commitments to Regulatory Guide 1.33, which endorses ANSI N18.7, as specified in Section 1.8 of the Final Safety Analysis Report (FSAR) for the H. B. Robinson Steam Electric Plant (HBR2). In addition, the proposed change will provide oversight consistency within CP&L.

In the area of independent review, the proposed change modifies the wording for specific items requiring independent review to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7.

The provisions of 10 CFR 50.54(a)(1) require implementation of a QA Program as described in the Safety Analysis Report. The recently submitted QA Program change describes the NAD Assessment Program. This proposed change also removes specific details of the NAD audit/assessment program from the Technical Specifications (TS) and makes reference to Section 17.3 of the FSAR for these details. This change eliminates inconsistency and duplication between the TS and the QA Program described in the FSAR. The QA Program description in the FSAR addresses the elements for an audit/assessment program identified in NUREG-0800, Section 17.3.

The proposed change modifies the following specific sections of the TS as indicated:

Section 6.5.1.6: Plant Nuclear Safety Committee (PNSC)

CHANGE: 6.5.1.6.2 - The proposed change deletes the position of Director - QA/QC from the list of members of the Plant Nuclear Safety Committee (PNSC) as this position no longer exists at the HBR2.

BASIS: This position as a PNSC member was a holdover from original plant organizations where the QA Supervisor was part of the plant staff and reported directly to the General Manager - Robinson Plant. Creation of the NAD deleted this position and allows NAD to independently assess PNSC activities.

Section 6.5.2: NAD Independent Review Program

CHANGE: The proposed change modifies the wording and structure for this section. Specific details are described below.

BASIS: The proposed change modifies the wording and structure for this section to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. Unless otherwise noted, the proposed change maintains the same degree of review.

CHANGE: 6.5.2 - The proposed change moves the existing function section to proposed TS 6.5.2.1 due to reformatting.

BASIS: The proposed change moves the function section to proposed TS 6.5.2.1 to provide consistency among CP&L nuclear facilities and compliance with ANSI N18.7. The proposed change maintains the same degree of review.

CHANGE: 6.5.2.1 - The proposed change removes sections a) through c) from the TS and includes them in NAD procedures which meet the requirements of proposed TS 6.5.2.2.7.

BASIS: The proposed change relocates sections a) through c) to provide consistency among CP&L nuclear facilities and compliance with ANSI N18.7. This existing section contains broad generalities which are better covered by NAD procedures per the requirements of proposed TS 6.5.2.2.7. The proposed change maintains the same degree of review.

CHANGE: 6.5.2.1.d.1 - The proposed change moves this existing section to proposed TS 6.5.2.3.a due to reformatting.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7.

CHANGE: 6.5.2.1.d.2 - The proposed change moves this existing section to proposed TS 6.5.2.3.b due to reformatting. The phrase "changes in procedures" is replaced with "changes in procedures required by these Technical Specifications." The phrase, "prior to implementation," is moved to the first sentence. The last sentence is deleted.

BASIS: Relocation of the phrase, "prior to implementation," makes it clear that the review, and not just its submittal, must be completed prior to implementation. All items in Section 6.5.2.1.d must be referred to NAD for review. This makes the last sentence redundant. The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The proposed change maintains the same degree of review.

CHANGE: 6.5.2.1.d.3 - The proposed change moves this existing section to proposed TS 6.5.2.3.c due to reformatting.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and compliance with ANSI N18.7. The proposed change maintains the same degree of review.

CHANGE: 6.5.2.1.d.4 - The proposed change moves this existing section to proposed TS 6.5.2.3.d due to reformatting and clarifies which items will be reviewed. This requirement is expanded to include violations, significant operating abnormalities, or deviations that are reportable to the NRC. Violations that require reporting to the NRC in writing will require independent review. Reportable events specified in 10 CFR which require reporting to the NRC will require independent review.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities, ensure continued compliance with ANSI N18.7, and ensure continued compliance with regulations. Consistent with ANSI N18.7, the proposed change will require an independent review by the NAD of CP&L self-identified violations reportable in writing to the NRC, in addition to the reportable conditions to the NRC.

CHANGE: 6.5.2.1.d.5 - The proposed change moves this existing section to proposed TS 6.5.2.3.e due to reformatting.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The proposed change maintains the same degree of review.

CHANGE: 6.5.2.1.d.6 - PNSC reports and minutes are eliminated from formal review.

BASIS: The proposed change eliminates PNSC reports and minutes from formal review to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. Items of safety significance that are reviewed by PNSC will continue to be independently reviewed by the NAD. In accordance with TS 6.5.1.6.8, the PNSC will forward its minutes to the NAD so that the safety significant issues are identified.

CHANGE: 6.5.2.2.a - This existing requirement is moved to proposed Section 6.5.2.4.a due to reformatting. The results of independent reviews are addressed in proposed Section 6.5.2.4.b.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The results of independent reviews are addressed in proposed Section 6.5.2.4.b.

CHANGE: 6.5.2.2.b - This existing requirement is moved to proposed Section 6.5.2.4.b due to reformatting. The proposed change modifies the conditions that identify potentially adverse conditions from "recommendations and concerns" to submittal "in accordance with the corrective action program."

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The corrective action program is a formalized program that identifies, prioritizes and responds to potentially adverse conditions that are identified by individuals or functional organizational units within CP&L.

CHANGE: 6.5.2.2.c - This existing requirement is moved to proposed Section 6.5.2.4.c due to reformatting. The proposed change modifies the type of report to a presentation given to the Executive Vice President - Nuclear Generation Group. The Vice President - Robinson Nuclear Project and the Plant General Manager will receive a copy of the presentation. The Chairman/President has been excluded from this presentation.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The NAD performs internal evaluations and assessment activities and serves as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those deficiencies which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and to ensure effective correction of deficiencies. The Manager of the NAD is free at any time to raise issues to the Chairman/President if he determines that additional emphasis or action is necessary.

CHANGE: 6.5.2.2.d - The proposed change moves this existing section to proposed TS 6.5.2.2.7 due to reformatting.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The proposed change maintains the same degree of review.

CHANGE: 6.5.2.3.a - The proposed change moves this existing section to proposed TS 6.5.2.2.1 due to reformatting. The proposed change modifies the wording and list of discipline areas to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. Specifically, the area of "other appropriate fields" has been added.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The proposed change maintains the same level of qualification.

CHANGE: 6.5.2.3.b(1) - The proposed change moves this existing section to proposed TS 6.5.2.2.2 due to reformatting. The proposed change modifies the qualification requirements to apply to the Manager - Safety Review Unit and complies with ANSI N18.7. The term "Bachelor of Science" is replaced with "bachelor degree."

BASIS: The proposed change provides consistency among CP&L nuclear facilities and ensures continued compliance with ANSI N18.7 in regards to education qualification. In the current NAD organization, the position of Manager - Safety Review Unit is responsible for the independent review process. The proposed change maintains the same qualification requirements for the manager responsible for supervising this process.

CHANGE: 6.5.2.3.b(2) - The proposed change moves this existing section to proposed TS 6.5.2.2.3 due to reformatting. The term "Bachelor of Science" is replaced with "bachelor degree."

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The proposed change maintains the same qualification/education requirements.

CHANGE: 6.5.2.3.c - The proposed change moves this existing section to proposed TS 6.5.2.2.4 due to reformatting.

BASIS: Section renumbered to remain in applicable section.

CHANGE: 6.5.2.3.d - The proposed change moves this existing section to proposed TS 6.5.2.2.5 due to reformatting. The proposed change modifies the review process to eliminate a specific number of reviews.

BASIS: The proposed change modifies the wording to provide consistency among CP&L nuclear facilities and ensure continued compliance with ANSI N18.7. The basis for requiring three reviews in the existing TS is to ensure that applicable disciplines are encompassed. The proposed change specifically requires reviews in applicable disciplines by qualified individuals. Specifically requiring three reviewers is unnecessarily restrictive and does not ensure appropriate reviews are performed.

CHANGE: 6.5.2.3.e - The proposed change moves this existing section to proposed TS 6.5.2.2.6 due to reformatting.

BASIS: Section renumbered to remain in applicable section.

Section 6.5.3: NAD Audit Program

CHANGE: The proposed change replaces specific details in this section with reference to the QA Program in Section 17.3 of the FSAR which describes the NAD audit/assessment program.

BASIS: 10 CFR 50.54(a)(1) requires implementation of a QA Program as described in the Safety Analysis Report. This change eliminates inconsistency and duplication between the TS and the QA Program described in the FSAR. The QA Program description in the FSAR addresses the elements for an audit/assessment program identified in NUREG-0800, Section 17.3.

This amendment request will transfer the Fire Protection Audit requirement from the TS to the FSAR Section 17.3.3.3 with all other assessment requirements. Since administrative controls are retained, the intent of the Generic Letter is met and there is no reduction in safety.

Section 6.5.4: Outside Agency Inspection and Audit Program

CHANGE: The proposed change deletes specific details in this section and references the QA Program in Section 17.3.3.3 of the FSAR, which describes the NAD audit/assessment program.

BASIS: Generic Letter 88-12 allows the removal of Fire Protection Program requirements from the TS, provided that a periodic audit be conducted of the Fire Protection Program. The Generic Letter requested that the existing administrative controls related to Fire Protection Program audit requirements be retained in the TS. This change eliminates inconsistency and duplication between TS, the Generic Letter recommendations, and the QA Program described in the FSAR. The QA Program description in the FSAR addresses the elements for an audit/assessment program identified in NUREG-800, Section 17.3, and includes a requirement for a Fire Protection audit/assessment. 10 CFR 50.54(a)(1) requires implementation of a QA Program as described in the FSAR.

Section 6.10.2

CHANGE: The specific records are regrouped to provide consistency among CP&L nuclear facilities. Specifically, the records listed in existing Item "k" are separated into proposed Item "k" and the new Item "m." Records of previous CNS reviews will be maintained by the NAD and are deleted from the listings.

BASIS: Retention requirements for QA activity records will be identified in the QA Program. With the exception of QA activity records, the proposed change maintains the same type of records and retention requirements. The NAD has the responsibility of maintaining independent review records regardless of previous organizational titles.

ENCLOSURE 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/OPERATING LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT FUNCTIONAL CHANGES

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility 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 consequences of an accident previously evaluated, (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. Carolina Power & Light Company (CP&L) has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change

CP&L has created a Nuclear Assessment Department (NAD) which performs internal evaluations and assessment activities. The department's fundamental role is to assist management in the early identification of issues which may prevent the Company's nuclear projects from achieving quality performance on a sustained basis and in ensuring effective correction. The NAD has assumed the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities and (2) the assessment of unit activity.

The proposed amendment would implement the functional role and responsibilities of the recently created NAD. Specifically, the changes affect the independent review program and the independent assessment of unit activity.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because it is programmatic and does not physically alter any safety-related systems, nor does it affect the way in which any safety-related systems perform their functions. The independent review function is being revised to provide program consistency among the nuclear units while maintaining compliance with ANSI N18.7. The independent assessment requirements for the NAD are being removed from the TS and reference made to the QA Program for these details. Since the design of the facility and system operating parameters are not changing, the proposed amendment does not involve an increase in the probability or consequences of any accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in Item 1, the proposed amendment is programmatic and does not physically alter any safety-related systems; nor does it affect the way in which any safety-related systems perform their functions. Since the design of the facility and system operating parameters are not changing, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety because it is a programmatic change. As stated in Item 1, the proposed amendment does not physically alter any safety-related systems; nor does it affect the way in which any safety-related systems perform their functions. Since the design of the facility and system operating parameters are not changing, the proposed amendment does not involve any reduction in the margin of safety.

ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/OPERATING LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT FUNCTIONAL CHANGES

ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site; and (3) result in an increase in an individual or cumulative occupational radiation exposure. Carolina Power & Light Company (CP&L) has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. This basis for this determination follows:

Proposed Change

Carolina Power & Light Company has created a Nuclear Assessment Department (NAD) which performs internal evaluations and assessment activities. The department's fundamental role is to assist management in the early identification of issues which may prevent the Company's nuclear projects from achieving quality performance on a sustained basis and in ensuring effective correction. The NAD has assumed the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities and (2) the assessment of unit activity.

Basis

This change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.

2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site.

   The proposed change is programmatic and only revises Section 6, "Administrative Controls," of the TS to reflect changes in the review and assessment of CP&L due to the creation of the NAD. The proposed amendment does not introduce any new equipment, nor does it require any existing equipment or systems to perform a different type of function than they are currently designed to perform. As such, the change cannot

affect the types or amounts of any effluents that may be released off-site.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change is programmatic and only revises Section 6, "Administrative Controls," of the TS to reflect changes in the review and assessment of CP&L due to the creation of the NAD. No additional surveillances or testing result from the amendment. Therefore, the amendment has no effect on either individual or cumulative occupational radiation exposure.