UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED CHANGE TO QUALITY ASSURANCE PROGRAM

CAROLINA POWER & LIGHT COMPANY

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2

DOCKET NO. 50-261

1.0 INTRODUCTION

By letter dated September 30, 1998, Carolina & Light Company (the licensee) submitted a proposed change to its quality assurance (QA) program description for the H. B. Robinson Steam Electric Plant, Unit No. 2, contained in Section 17.3 of the Updated Final Safety Analysis Report (UFSAR). The change was submitted as a reduction in commitment under the provisions of 10 CFR 50.54(a)(3). The proposed change revises the educational qualification requirements for individuals performing and managing the independent safety review function. This evaluation reviews the change for conformance to applicable 10 CFR 50, Appendix B requirements.

2.0 BACKGROUND

The independent safety review function was originally incorporated into the administrative controls section of the licensee's Technical Specifications (TS) in accordance with the guidance of ANSI Standard N18.7-1972, "Administrative Controls for Nuclear Power Plants," Section 4.2, "Administration of the Independent Review and Audit Programs," and Section 4.3, "Subjects Requiring Independent Review."

The independent safety review function was subsequently subsumed within the responsibilities of the Nuclear Assessment Department, approved by TS Amendment No. 138 on December 20, 1991. This corporate program was replaced by a site-specific program, administered under the Nuclear Assessment Section, which was approved by TS Amendment No. 160 on March 31, 1995. Nuclear Assessment Section responsibilities were relocated intact from Section 6.5.2 of the Technical Specifications to the licensee's QA program description, Revision 15, approved by the Commission on May 15, 1998.

The Nuclear Assessment Section provides independent review of plant changes, tests, and procedures. The independent review function also verifies that reportable events are

investigated in a timely manner that reduces the probability of recurrence of such events and detection of trends that may not be apparent to a day-to-day observer.

The licensee has committed, in Section 1.8 of the UFSAR, to ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel." The 1971 edition of the ANSI standard does not address qualification requirements for independent review personnel; these requirements were added in ANSI/ANS-3.1-1978; general criteria for evaluating an alternative to the educational requirements for nuclear power plant personnel were added in ANSI/ANS-3.1-1981.

3.0 EVALUATION

The licensee proposes changes to the formal educational qualification requirements for persons performing and managing the independent review functions. The affected paragraphs of the QA program description are as follows:

1.7.2.2 The Manager - Nuclear Assessment Section shall have a bachelor's degree in an engineering or related field and, in addition, shall have a minimum of ten years' related experience, of which five years shall be in the operation and/or design of nuclear power plants.

1.7.2.3 The individuals performing independent safety reviews shall have a bachelor's degree in an engineering or related field or equivalent and, in addition, shall have a minimum of five years' related experience.

3.1 Criteria for Establishing Alternatives to Education Requirements

The licensee proposes to add Section 1.7.2.8 to the QA program description, which incorporates the ANSI/ANS-3.1-1981, Section 4.1 criteria for evaluation of an acceptable alternative to the educational requirements.

> *"Individuals who do not possess the formal educational requirements specified in* [Sections 1.7.2.2 and 1.7.2.3] *shall not be automatically eliminated where other factors provide sufficient demonstration of their abilities. These other factors shall be evaluated on a case-by-case basis and approved and documented by the [Vice President - Robinson Nuclear Plant]. The positive factors listed as follows may be considered in making the evaluation of an acceptable alternative to the educational requirements.*
>
> *a. High school diploma or GED.*
> *b. Academic and related technical training.*
> *c. Qualified as an NRC senior operator at the assigned plant.*
> *d. Four years of additional experience in his area of responsibility.*
> *e. Four years of supervisory or management experience.*
> *f. Demonstrated ability to communicate clearly (orally and in writing).*
> *g. Certification of academic ability and knowledge by corporate management.*
> *h. Successful completion of the Engineer-In Training examination.*
> *I. Professional Engineer License.*
> *j. Associate degree in Engineering or related science."*

For item c, the licensee proposes to replace the generic criterion by the plant-specific "Has or have held a license as a senior reactor operator at HBRSEP, Unit No. 2."

The qualification requirements for independent review personnel (Paragraph 1.7.2.3) already provide for an alternative to the formal educational requirements; Section 1.7.2.8 merely clarifies the alternative. These criteria are consistent with consensus standard ANSI/ANS-3.1-1981, which cautions that the guidance should used sparingly as an exception for rare, exceptional individuals.

Section 1.7.2.1 of the licensee's QA program description requires that the independent review function be carried out by a staff having the collective experience and competence required to review activities in the following areas: nuclear power plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, nondestructive testing, instrumentation and control, radiological safety, mechanical and electrical engineering, administrative controls, seismic and environmental, quality assurance practices, and other appropriate fields.

The requirement that competence in the above engineering and related fields be maintained provides reasonable assurance that selection of individuals lacking engineering credentials will be made sparingly rather than as a general rule. The proposed clarification is acceptable.

3.2 Alternative to Educational Requirement - Manager, Nuclear Assessment Section

For the position of Manager, Nuclear Assessment Section, the licensee proposes to provide the same alternative as for other independent review personnel. This would provide the licensee with the flexibility to select candidates for the position who are otherwise qualified, but would be automatically eliminated on the basis of the formal educational requirement.

The ANSI/ANS-3.1-1981, Section 4.1 criteria for evaluation of an acceptable alternative to the educational requirements may be generally applied to nuclear power plant personnel, including managers. The licensee's requirement that candidates for the position have a minimum of 10 years of experience in the area of engineering or related field, of which 5 years are in the operation and/or design of nuclear power plants, provides reasonable assurance that qualified candidates are selected. Documented evaluation and approval by the site Vice President provides adequate control of the selection process. The proposed alternative is acceptable.

4.0 CONCLUSIONS

The staff finds that the proposed change to the qualification requirements for personnel performing and managing the independent review function will continue to satisfy the criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

Principal Contributor: K.Heck

Date: November 19, 1998