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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
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 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Operating Reactors Branch 1

SUBJECT: Requests amend to license DPR-23, changing Tech Specs to reflect reorganization of Util Generation Dept. Class II fee encl.

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Carolina Power & Light Company

November 7, 1979

FILE: NG-3514 (R)

SERIAL NO.: GD-79-2848

Office of Nuclear Reactor Regulation
Attention: Mr. Albert Schwencer, Chief
Operating Reactors Branch No. 1
United States Nuclear Regulatory Commission
Washington, D. C. 20555

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

REQUEST FOR LICENSE AMENDMENT - CORPORATE REORGANIZATION

Dear Mr. Schwencer:

Effective November 3, 1979, Carolina Power & Light Company (CP&L) is reorganizing its Generation Department. The Generation Department is being split into two new departments, the Nuclear Operations Department and the Fossil Operations Department. Within the Nuclear Operations Department, the position of Manager of Nuclear Generation has been abolished. The plant manager positions at the Brunswick and Robinson Units have been elevated to the position of General Manager and the new General Managers will report directly to the Vice President in charge of the Nuclear Operations Department. Also, the plant organization at the Robinson plant has been reorganized. The new organization is shown on the attached Figure 6.2-2.

The above changes necessitate changes in the H. B. Robinson Unit 2 Technical Specifications. Accordingly, in accordance with the Code of Federal Regulations Title 10, Part 50.90 and Part 2.101, CP&L requests a revision to the Technical Specifications for H. B. Robinson to reflect the above reorganization. Replacement pages for the Technical Specifications are enclosed. Changes are indicated by a vertical line in the right hand margin of the affected page.

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\$1,200.00*

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Mr. Albert Schwencer

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In accordance with 10 CFR 170.12(c) we have determined that this revision constitutes one Class II Amendment. Accordingly, our check for \$1,200 is enclosed.

If you have any questions on these items, please contact our staff.

Yours very truly,

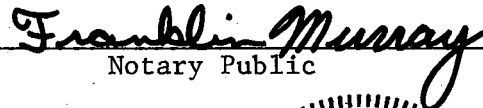


E. E. Utley
Executive Vice President
Power Supply & Customer Services

EEU/jcb

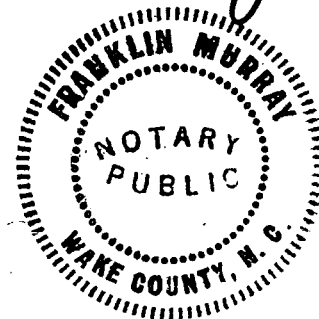
Enclosures

Sworn to and subscribed before me this 7th day of November 1979.


Notary Public

My Commission expires October 4, 1981.

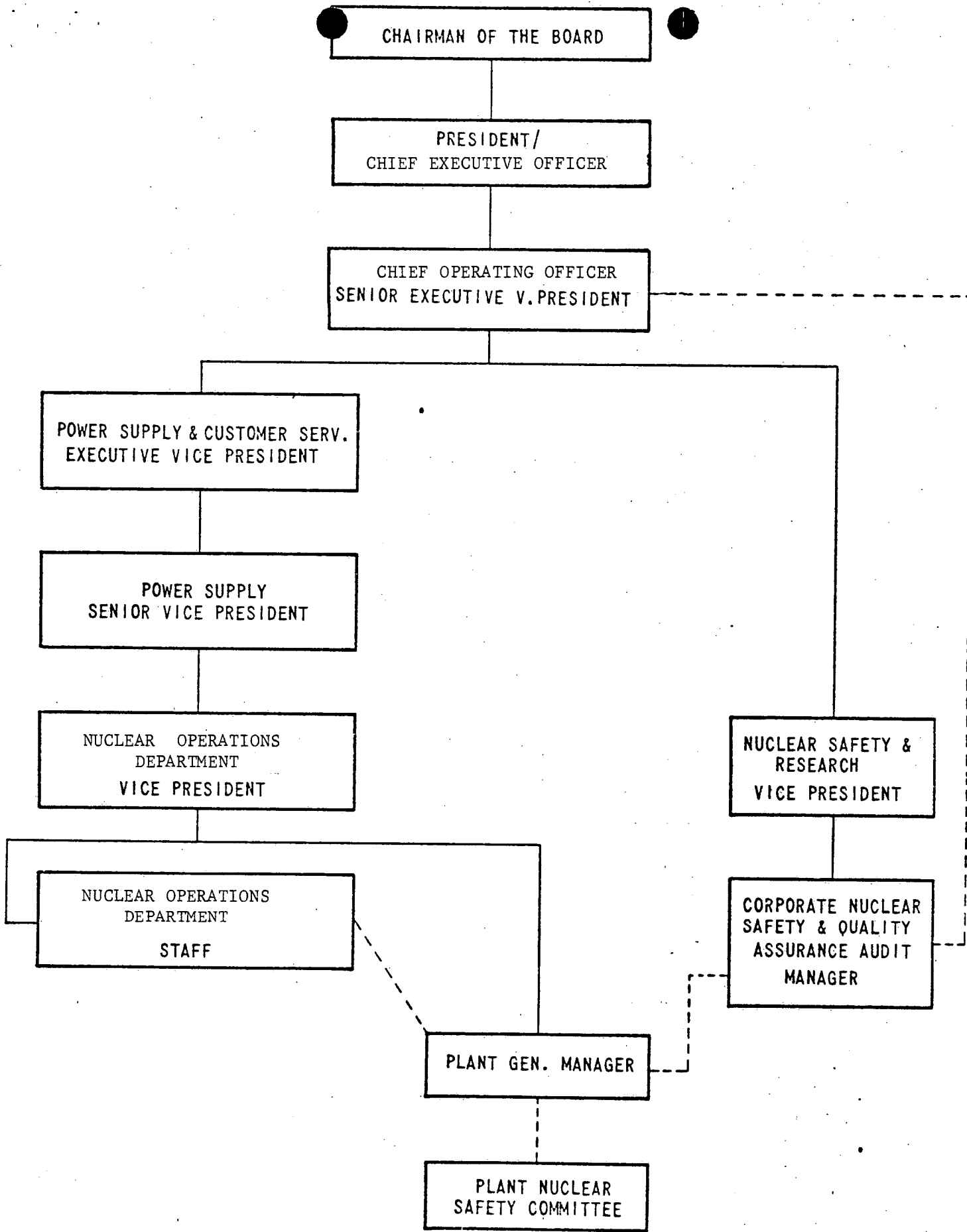
cc: Mr. James P. O'Reilly (NRC)



6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.



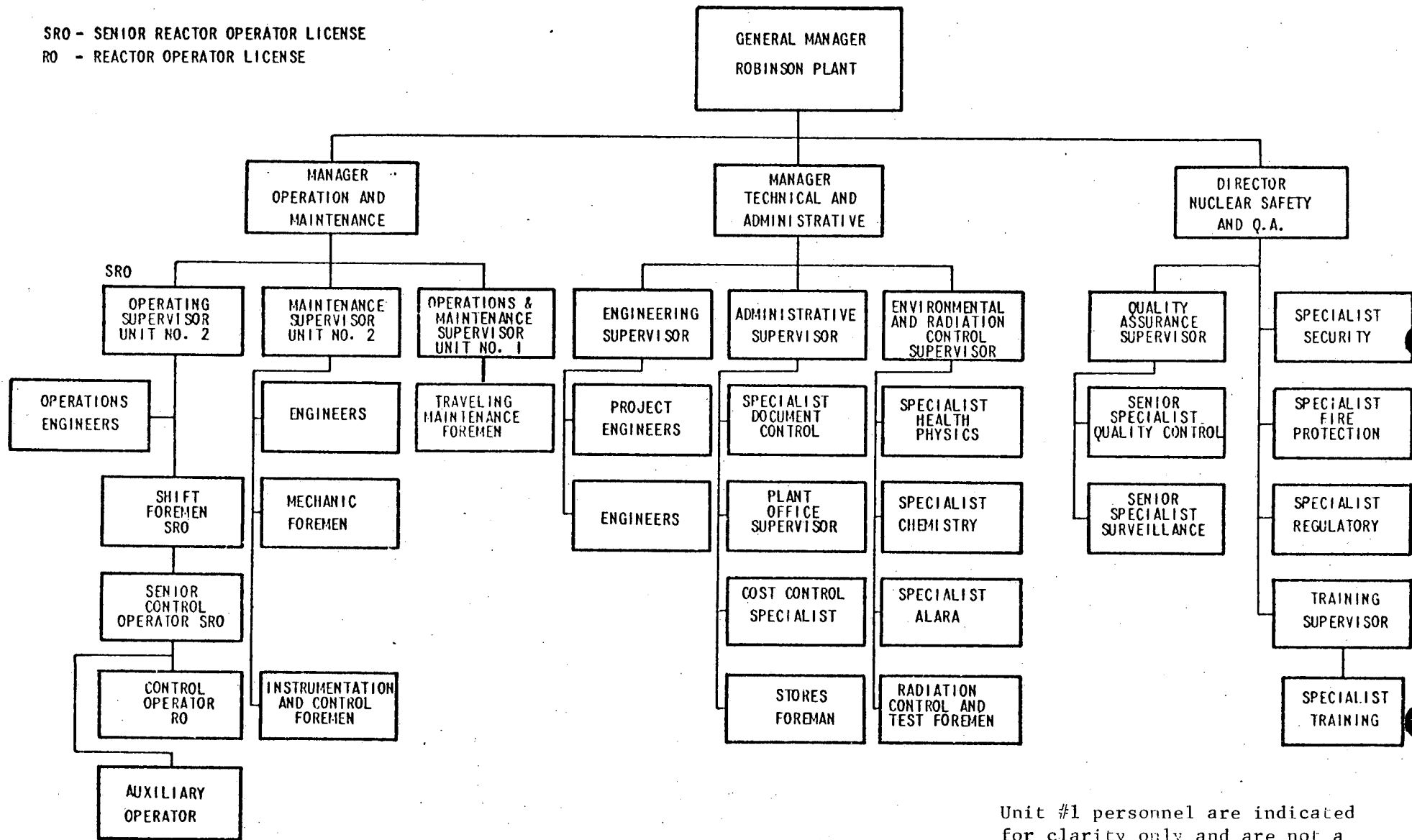
_____ ADMINISTRATIVE ORGANIZATION

----- LINES OF COMMUNICATION

OFF-SITE ORGANIZATION FOR
H.B. ROBINSON 2 MANAGEMENT
AND TECHNICAL SUPPORT

FIGURE 6.2-1
6.2-3

SRO - SENIOR REACTOR OPERATOR LICENSE
 RO - REACTOR OPERATOR LICENSE



6.2-4

Unit #1 personnel are indicated for clarity only and are not a part of these specifications.

CONDUCT OF OPERATIONS CHART

FIGURE 6.2-2

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Director - Nuclear Safety and QA and shall meet or exceed the requirements of Section 27 of the NFPA Code 1975, except that training sessions shall be conducted at least quarterly.

6.5 REVIEW AND AUDIT

Organizational units for the review and audit of plant operations shall be constituted and have the responsibilities and authorities outlined below:

6.5.1 Plant Nuclear Safety Committee (PNSC)

6.5.1.1 Purpose

As an effective means for regular review, evaluation, and maintenance of plant operational safety, a Plant Nuclear Safety Committee (PNSC) has been established. The committee is chaired by the Plant Manager and composed of plant supervisory personnel.

6.5.1.2 Composition

The Plant Nuclear Safety Committee shall be composed of the following, with a secretary to be named by the Chairman:

- a. Chairman: General Manager
- b. Vice Chairman: Operations and Maintenance or Technical and Administrative Managers or Director-Nuclear Safety and QA
- c. Engineering Supervisor
- d. Maintenance Supervisor - Unit #2
- e. Environmental and Radiation Control Supervisor
- f. Quality Assurance Supervisor
- g. Training Supervisor
- h. Operating Supervisor - Unit #2
- i. Administrative Supervisor - Unit #2

6.5.1.3 Alternates

Alternate members shall be appointed in writing by the PNSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PNSC activities as voting members at any one time.

6.5.1.4 Consultants

Consultants shall be utilized as determined by the PNSC Chairman to provide expert advice to the PNSC.

6.5.1.5 Meeting Frequency

The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman.

6.5.1.6 Quorum

A quorum of the PNSC shall consist of the Chairman or Vice Chairman plus three members including alternates.

6.5.1.7 Responsibilities

- a. Review of (1) all procedures required by Specification 6.8 and changes thereto, (2) any other proposed procedures or changes thereto as determined by the General Manager to affect nuclear safety.
- b. Review of all proposed test and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

- e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Vice President - Nuclear Operations and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit.
- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and reports thereon as requested by the Manager - Corporate Nuclear Safety and Quality Assurance Audit.
- h. Review of the Plant Security Plan and implementing procedures.
- i. Review of the Emergency Plan and implementing procedures.
- j. Review of all events requiring 24-hour reports to the NRC by regulations or Technical Specifications.

6.5.1.8 Authority

- a. The Plant Nuclear Safety Committee shall be advisory.
- b. The Plant Nuclear Safety Committee shall recommend to the General Manager approval or disapproval of proposals under 6.5.1.7.a. through d. above.

In the event of disagreement between the recommendations of the Plant Nuclear Safety Committee and the actions contemplated by the General Manager, the course determined by the General Manager to be more conservative will be followed with immediate notification to the Vice President - Nuclear Operations and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit.

- c. The Plant Nuclear Safety Committee shall make determinations as to whether or not proposals considered by the Committee involve unreviewed safety questions. This determination shall be subject to review by the Manager - Corporate Nuclear Safety and Quality Assurance Audit as specified under 6.5.2.4.a.

6.5.1.9 Records

Minutes shall be kept at the plant of all meetings of the Plant Nuclear Safety Committee and copies shall be sent to the Vice President - Nuclear Operations and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit.

6.5.1.10 Procedures

Written administrative procedures for committee operation shall be prepared and maintained.

2. Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components.

Review of events covered under this paragraph shall include the results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- e. Any other matter involving safe operation of the nuclear power plant which the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section deems appropriate for consideration, or which is referred to the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section by the onsite operating organization or by other functional organizational units within Carolina Power & Light Company.

Follow-up Action

6.5.3.4 Results of Corporate Nuclear Safety (CNS) reviews, including recommendations and concerns will be documented.

- a. Copies of the documented review will be retained in the Corporate Nuclear Safety & Quality Assurance Audit Section files.
- b. Recommendations and concerns will be submitted to the Vice President - Nuclear Generation within 14 days of determination.
- c. A summation of Corporate Nuclear Safety recommendations and concerns will be submitted to the President/Chief Executive

Reports

6.5.4.3 Results of audit are approved by the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section and transmitted directly to the Company President/Chief Executive Officer, the Chief Operating Officer, as well as to the Executive Vice President - Power Supply & Customer Services, the Senior Vice President - Power Supply, and the Vice President - Nuclear Safety & Research, and others as appropriate, within 30 days after the completion of the audit.

6.5.4.4 The corporate quality assurance audit program shall be conducted in accordance with written, approved procedures.

6.5.5 Fire Prevention and Loss Prevention

6.5.5.1 An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite personnel or an outside fire protection firm.

6.5.5.2 An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than three years.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken in the event of a reportable occurrence:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. A copy of each Reportable Occurrence Report shall be forwarded to the Manager of Corporate Nuclear Safety and Quality Assurance Audit and the Vice President - Nuclear Operations.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit violation shall be reported to the Commission, the Vice President - Nuclear Operations and the Manager of Corporate Nuclear Safety and Quality Assurance Audit within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSC. This report shall describe (1) applicable circumstances preceding the violation, (2) the effects of the violation upon facility components, systems of structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Manager of Corporate Nuclear Safety and Quality Assurance Audit and the Vice President - Nuclear Operations within 14 days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33 dated November 3, 1972, except as provided in 6.8.2 and 6.8.3 below.

6.8.2 Proposed operating procedures, overall plant operating procedures, system descriptions, emergency procedures, fuel handling procedures, periodic test procedures, procedures for equipment maintenance which may affect nuclear safety, annunciator procedures, Fire Protection Program implementation procedures and any other procedures determined by the General Manager to affect nuclear safety, shall be reviewed by the PNSC and approved by the General Manager. Prior to implementation, proposed changes to these procedures must also be reviewed and approved in this manner.

6.8.3 Temporary changes to procedures of 6.8.2 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License.
- c. The change is documented, reviewed by the PNSC and approved by the General Manager within three weeks of implementation.