

6.5.1.2.4 Modifications that are determined to either constitute an unreviewed safety question, as defined in 10 CFR 50.59(a)(2), or a change to the Technical Specifications, shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such modifications shall be approved by the Corporate Nuclear Safety Section prior to implementation.

6.5.1.2.5 Modifications which constitute changes to the facility as described in the FSAR shall also be reviewed by the Corporate Nuclear Safety Section. This review may be conducted after plant Management approval, and implementation may proceed prior to completion of review.

6.5.1.3 Technical Specifications and License Changes

6.5.1.3.1 Each proposed Technical Specification or Operating License change shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval.

6.5.1.4 Review of Technical Specification Violations

6.5.1.4.1 All violations of Technical Specifications shall be investigated and a report prepared that evaluates the occurrence and that provides recommendations to prevent recurrence. Such reports shall be reviewed by the PNSC and approved by the Plant General Manager or his designee and submitted to the Manager - Robinson Nuclear Project and to the Manager - Corporate Nuclear Safety.

6.5.1.5. Nuclear Safety Review Qualification

6.5.1.5.1 Individuals shall be designated by the Plant General Manager for the safety reviews of Specifications 6.5.1.1.2, 6.5.1.1.3, 6.5.1.2.1, and 6.5.1.2.2. These reviewers shall have a Bachelor of Science in engineering or related field or equivalent and two (2) years related experience.

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6.5.1.6 Plant Nuclear Safety Committee (PNSC)

6.5.1.6.1 a. As an effective means for the regular overview, evaluation, and maintenance of plant operational safety, a Plant Nuclear Safety Committee (PNSC) is established.

b. The committee shall function through the utilization of subcommittees, audits, investigations, reports, and/or performance of reviews as a group.

6.5.1.6.2 The PNSC shall be composed of the following:

Chairman - General Manager or designated alternate

Member - Manager - Operations and Maintenance or designated alternate

Member - Manager - Technical Support or designated alternate

Member - Manager - Administration or designated alternate

Member - Manager - Environmental & Radiation Control or designated alternate

Member - Director - QA/QC or designated alternate

6.5.1.6.3 Alternates shall be appointed in writing by the General Manager to serve on a temporary basis. Alternates shall, as a minimum, meet the qualifications specified for professional-technical personnel in Section 4.4 of ANSI N18.1-1971.

6.5.1.6.4 The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate.

6.5.1.6.5 A quorum of the PNSC shall consist of the Chairman, and three members, of which two may be alternates.

6.5.1.6.6 The PNSC activities shall include the following:

- a. Perform an overview of Specifications 6.5.1.1 and 6.5.1.2 to assure that processes are effectively maintained.
- b. Performance of special reviews, investigations, and reports thereon requested by the Manager - Corporate Nuclear Safety.
- c. Annual review of the Security Plan and Emergency Plan.
- d. Perform reviews of Specifications 6.5.1.1.6, 6.5.1.2.4, 6.5.1.3.1, and 6.5.1.4.1.
- e. Perform review of all events requiring 24 hour notification to the NRC.
- f. Review of facility operations to detect potential nuclear safety hazards.

6.5.1.6.7 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. The Manager - Robinson Nuclear Project and the Manager - Corporate Nuclear Safety will be notified within 24 hours of the disagreement and subsequent actions.

6.5.1.6.8 The PNSC shall maintain written minutes of each meeting that, at a minimum, document the results of all PNSC activities performed under the provisions of these Technical Specifications; and copies shall be provided to the Manager - Robinson Nuclear Project and to the Manager - Corporate Nuclear Safety.

recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

(5) Any other matter involving safe operation of the nuclear power plant that the Manager - Corporate Nuclear Safety Section deems appropriate for consideration or which is referred to the Manager - Corporate Nuclear Safety Section by the on-site operating organization or by other functional organizations units within Carolina Power & Light Company.

(6) Reports and minutes of the PNSC.

6.5.2.2 Results of Corporate Nuclear Safety reviews, including recommendations and concerns, shall be documented.

- a. Copies of documented reviews shall be retained in the CNS files.
- b. Recommendations and concerns shall be submitted to the plant General Manager and Manager - Robinson Nuclear Project within 14 days of determination.
- c. A summation of Corporate Nuclear Safety recommendations and concerns shall be submitted to the Chairman/President; Executive Vice President - Power Supply and Engineering & Construction; Senior Vice President - Nuclear Generation; Manager - Robinson Nuclear Project; Vice President - Corporate Nuclear Safety & Research; plant General Manager; and others, as appropriate on at least a bimonthly frequency.
- d. The Corporate Nuclear Safety Review program shall be conducted in accordance with written, approved procedures.

- (4) The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50, at least once per 24 months.
- (5) The Emergency Plan and implementing procedures at least once per 24 months.
- (6) The Security Plan and implementing procedures at least once per 24 months.
- (7) The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- (8) Any other area of facility operation considered appropriate by the Corporate Quality Assurance Performance Evaluation unit; the Executive Vice President - Power Supply and Engineering & Construction; or the Senior Vice President - Nuclear Generation.

e. Distribute reports and other records to appropriate managers.

- 6.5.3.3
- a. Audit personnel shall be independent of the area audited. Selection for auditing assignments is based on experience or training that establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting auditing personnel, consideration shall be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.
 - b. Qualified outside consultants or other individuals independent from those personnel directly involved in plant operation shall be used to augment the audit teams when necessary. 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.

6.5.3.4 Results of plant audits are approved by the Principal QA Specialist - Performance Evaluation Unit, and transmitted the Executive Vice President - Power Supply and Engineering & Construction; the Senior Vice President - Nuclear Generation; Manager - Robinson Nuclear Project; General Manager; and the Vice President - Corporate Nuclear Safety & Research; and others, as appropriate within 30 days after the completion of the audit.

6.5.3.5 The Corporate Quality Assurance Audit Program shall be conducted in accordance with written, approved procedures.

6.6

REPORTABLE OCCURRENCE ACTION

6.6.1

The following actions shall be taken for reportable occurrences:

- a. The NRC shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.2.
- b. Each reportable occurrence requiring 24-hour notification to the NRC shall be reviewed in accordance with 6.5.1.6.6 and submitted to the Manager - Corporate Nuclear Safety Section, and the Manager - Robinson Nuclear Project.

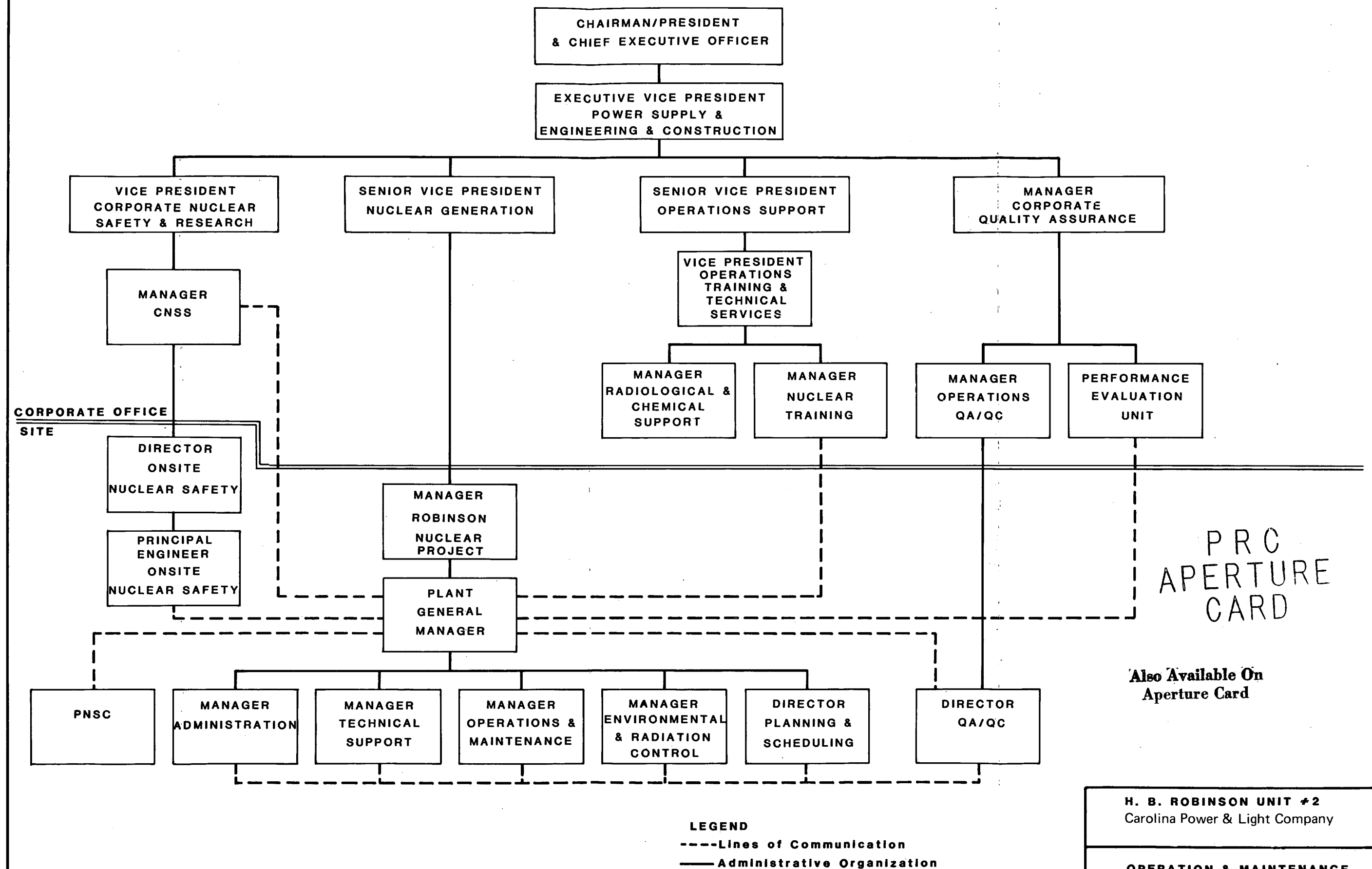
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SAFETY LIMIT VIOLATION

6.7.1

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

- a. The provisions of 10 CFR 50.72 shall be complied with.
- b. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with.
- c. The Safety Limit violation shall be reported to the NRC Region II, the Manager - Robinson Nuclear Project, and to the Manager - Corporate Nuclear Safety Section, within 24 hours.
- d. A Safety Limit Report shall be prepared. The report shall be reviewed in accordance with specification 6.5.1.6.6. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems, or structures; and (3) corrective action taken to prevent recurrence.
- e. The Safety Limit Violation Report shall be submitted to the NRC Region II, Manager - Robinson Nuclear Project, and the Manager - Corporate Nuclear Safety Section within 14 days of the violation.

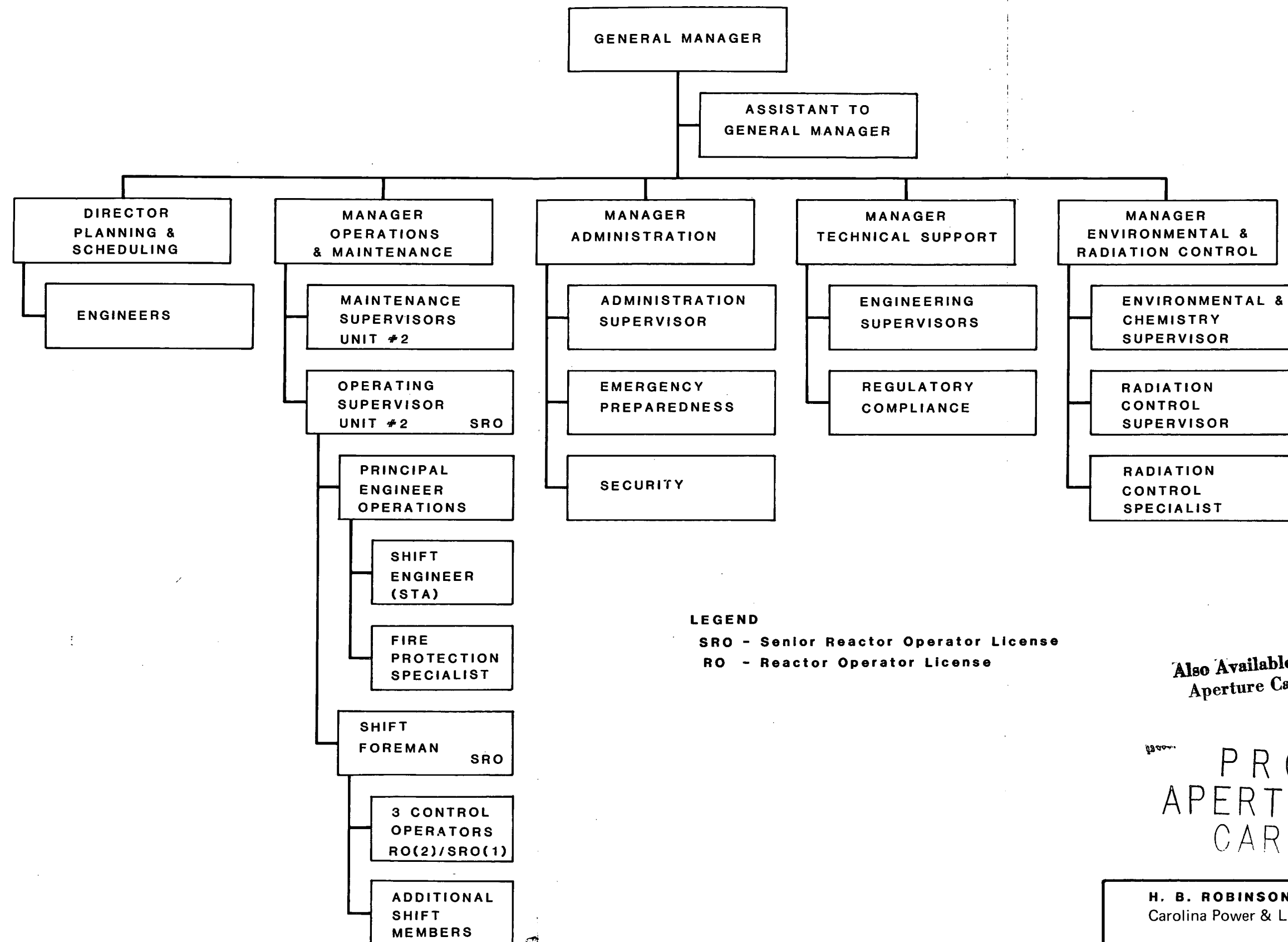


H. B. ROBINSON UNIT #2
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OPERATION & MAINTENANCE

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LEGEND
SRO - Senior Reactor Operator License
RO - Reactor Operator License

Also Available On
Aperture Card

PRC
APERTURE
CARD

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CONDUCT OF OPERATIONS

Figure 6.2-2

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