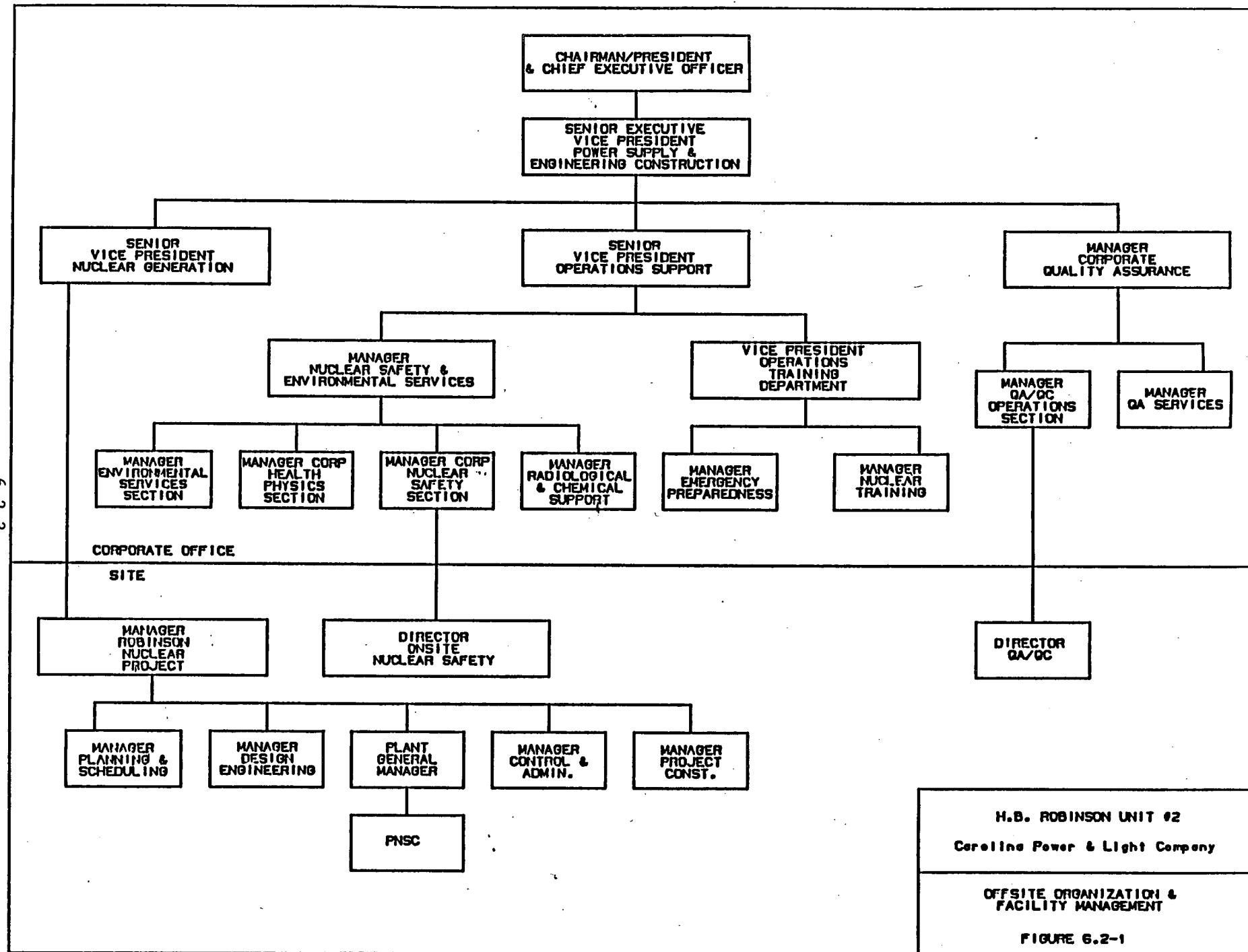


REVISED TECHNICAL SPECIFICATIONS

AFFECTED PAGES

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(1) CORPORATE REORGANIZATION
REVISED TS PAGES



6.2 ORGANIZATION

Offsite

- 6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1. The Corporate Organization may be changed without prior License Amendment to Figure 6.2-1 provided that an appropriate request is submitted within three months of the effective date of the organization change.

6.2.2 Definitions

- a) Personnel reporting to the General Manager - Robinson Plant shall be identified in Section 6 of the Technical Specifications as the plant staff.
- b) Personnel reporting to the Manager - Control and Administration shall be identified in Section 6 of the Technical Specifications as the C&A staff.

Facility Staff

- 6.2.3 The Robinson Nuclear Project organization shall be as shown in Figure 6.2-2 and:

- a) The shift complement during hot operations shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Senior Control Operator holding a Senior Reactor Operator's License, two Control Operators each holding a Reactor Operator's License, two additional shift members, and one Shift Technical Advisor. The limitations on the use of overtime applies to the HBR2 Shift Foremen, Senior-Control Operators, Control Operators, and Shift Engineers. These limitations apply only when HBR2 Reactor Coolant System is greater than 200 F or when fuel is being moved within the Reactor Pressure Vessel.

These limitations may be applied to other key "safety" personnel as warranted by the plant conditions and other circumstances at the discretion of the Plant General Manager.

CP&L's overtime policy is summarized as follows:

- 1) An individual shall not be permitted to work more than 12 hours straight (not including shift turnover time).
- 2) An individual will have at least the same number of hours off between work periods as the length of his last work period (not including shift turnover time).
- 3) An individual shall not work more than 84 hours in any 7 day period (not including shift turnover time).
- 4) An individual shall not work more than 14 consecutive days without having two consecutive days off.

Under very unusual circumstances, deviations from above restrictions may be authorized by the Plant General Manager. When the overtime required exceeds the limitations described above, the circumstances must be documented.

- b) The shift complement during cold shutdown shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Control Operator holding a Reactor Operator's License and one additional shift member.
- c) At least one licensed Operator shall be in the control room when fuel is in the reactor.
- d) At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown, and during recovery from reactor trips.

6.5.2 Corporate Nuclear Safety Section - Independent Review

The Corporate Nuclear Safety Section of the Nuclear Safety & Environmental Services Department shall provide independent review of significant plant changes, tests, and procedures; verify that reportable events are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer. Specific review subjects are defined in Specification 6.5.2.1.d.

6.5.2.1 The Manager - Corporate Nuclear Safety, under the Manager - Nuclear Safety & Environmental Services, is charged with the overall responsibility for administering the independent review function as follows:

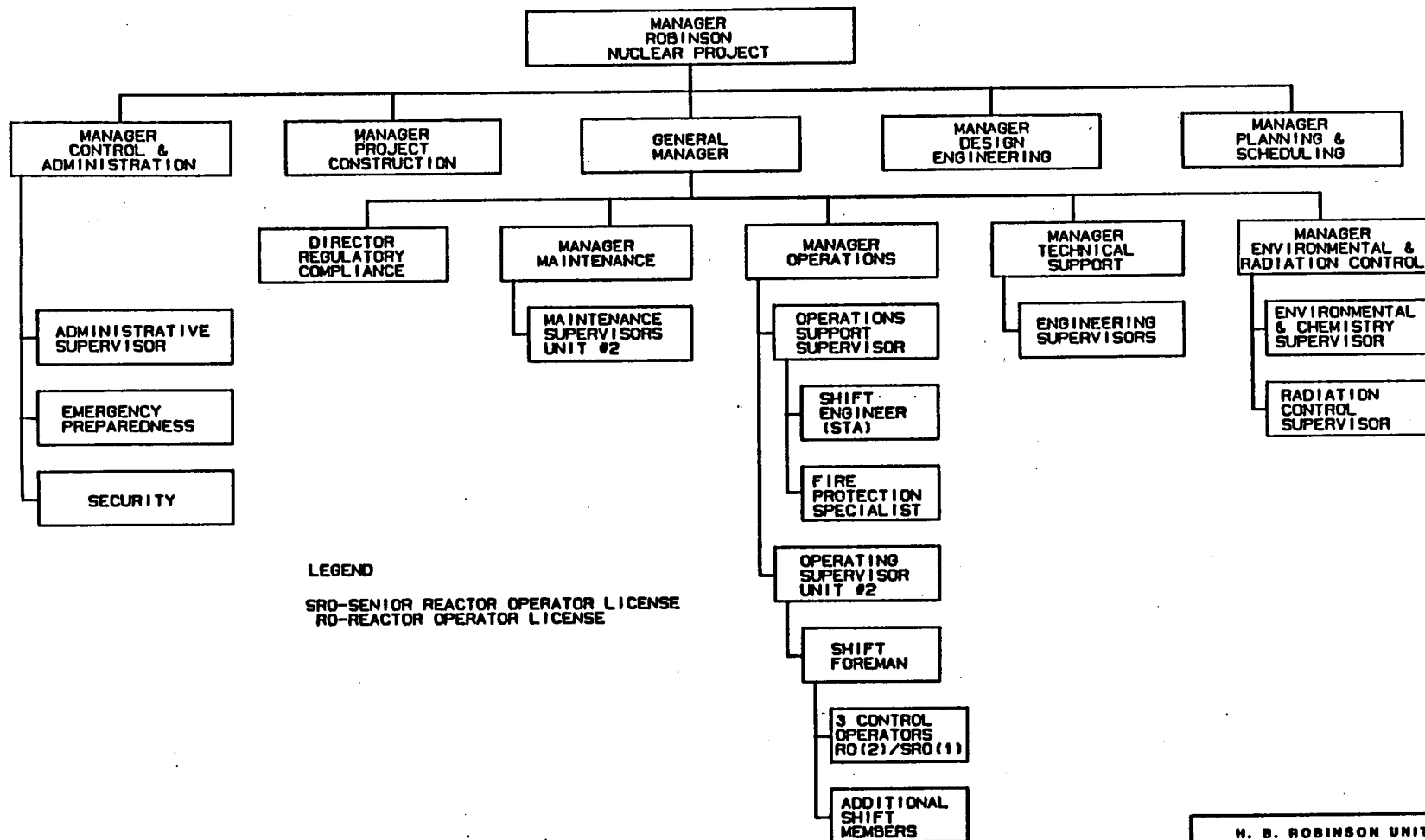
- a) Approves selection of the individuals to conduct safety reviews under Specification 6.5.2.
- b) Has access to plant records and operating personnel in performing independent reviews.
- c) Prepares and retains written records of reviews.
- d) Assures independent reviews are conducted on the following subjects:
 - 1) Written safety evaluations of changes in the facility as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report, and tests or experiments not described in the Safety Analysis Report that are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests, or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as

- 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; Senior Executive Vice President - Power Supply and Engineering & Construction; Senior Vice President - Nuclear Generation; Manager - Robinson Nuclear Project; Manager - Nuclear Safety & Environmental Services; 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.

- 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 Manager - QA Services Section and transmitted to the Senior Executive Vice President - Power Supply and Engineering & Construction; the Senior Vice President - Nuclear Generation; Manager - Robinson Nuclear Project; General Manager; and the Manager - Nuclear Safety & Environmental Services; 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.

(2) POSITION TITLE CHANGE

REVISED TS PAGE



LEGEND

SRO-SENIOR REACTOR OPERATOR LICENSE
RO-REACTOR OPERATOR LICENSE

H. B. ROBINSON UNIT #2
Caroline Power & Light Company

FACILITY ORGANIZATION
ROBINSON NUCLEAR PROJECT
Figure 6.2-2

- e) An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- f) ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- g) A Plant Fire Brigade of at least 5 members shall be maintained on site at all times. This excludes three members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.
- h) The Facility Organization may be changed without prior license amendment to Figure 6.2-2 provided that an appropriate change request is submitted within three months of the effective date of the organization change.

(3) FACILITY STAFF QUALIFICATION
REVISED TS PAGE

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff performing functions similar or equivalent to those functions delineated in ANSI N18.1-1971 shall meet or exceed ANSI N18.1-1971 with regards to the minimum qualifications for comparable positions.

6.3.2 The Manager - Environmental and Radiation Control shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The Guide says that he shall have a bachelor's degree or equivalent in a science or engineering subject. Equivalent in this case is defined as follows:

- (a) 4 years of formal schooling in science or engineering,
- (b) 4 years of applied radiation protection experience at a nuclear facility,
- (c) 4 years of operational or technical experience/training in nuclear power, or
- (d) any combination of the above totaling 4 years.

This requirements is in addition to the requirement for five years of professional experience in applied radiation protection.

6.3.3 The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

(4) PLANT NUCLEAR SAFETY COMMITTEE MEMBERSHIP

REVISED TS PAGE

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, to advise the General Manager on all matters related to nuclear safety.

6.5.1.6.2 The PNSC shall be composed of the following:

Chairman - General Manager or designated alternate

Member - Manager - Operations or designated alternate

Member - Manager - Maintenance or designated alternate

Member - Manager - Technical Support or designated alternate

Member - Director - Regulatory Compliance or designated alternate

Member - Manager - Environmental & Radiation Control or designated alternate

Member - Director - QA/QC or designated alternate

Member - Manager - Design Engineering or designated alternate

Member - Manager - Control & Administration or designated alternate

6.5.1.6.3 Alternates shall be appointed in writing by the General Manager to serve on a temporary basis. All alternates shall, as a minimum, meet qualification criteria specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel, or for those disciplines not listed in Section 4.4, the equivalent of the Section 4.4 requirement.

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.

(5) PLANT MODIFICATION APPROVAL AUTHORITY

REVISED TS PAGE

This analysis constitutes a first party safety review and may be accomplished by the individual who prepared the modification.

- 6.5.1.2.2 Prior to approval, a second safety review shall be performed on all modifications that affect nuclear safety. This review shall be performed by a qualified individual other than the individual who was the original preparer.
- 6.5.1.2.3 Following the two party review, modifications that have been determined neither to involve an unreviewed safety question as defined in 10 CFR 50.59(a)(2) nor a change to the Technical Specifications shall be approved, prior to implementation, by one of the following:
- a) Manager - Robinson Nuclear Project, or designated alternate,
or
 - b) General Manager, Robinson Plant, or designated alternate

The individual approving these modifications shall be other than those who performed the required reviews.

The Manager - Robinson Nuclear Project or other designated manager approving the review activities of the two-party review shall assure that the reviewers collectively possess the background and qualifications in all of the disciplines necessary and important to the specific review. To assure that the individuals selected for the two-party review are qualified and have the background necessary, the Manager - Robinson Nuclear Project shall approve and maintain a list of qualified persons. Included in this list will be individuals in addition to the first and second party reviewers whose expertise may be necessary during the review to assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review. The list will include the disciplines for which each person is qualified.