

6.0 ADMINISTRATIVE CONTROLS

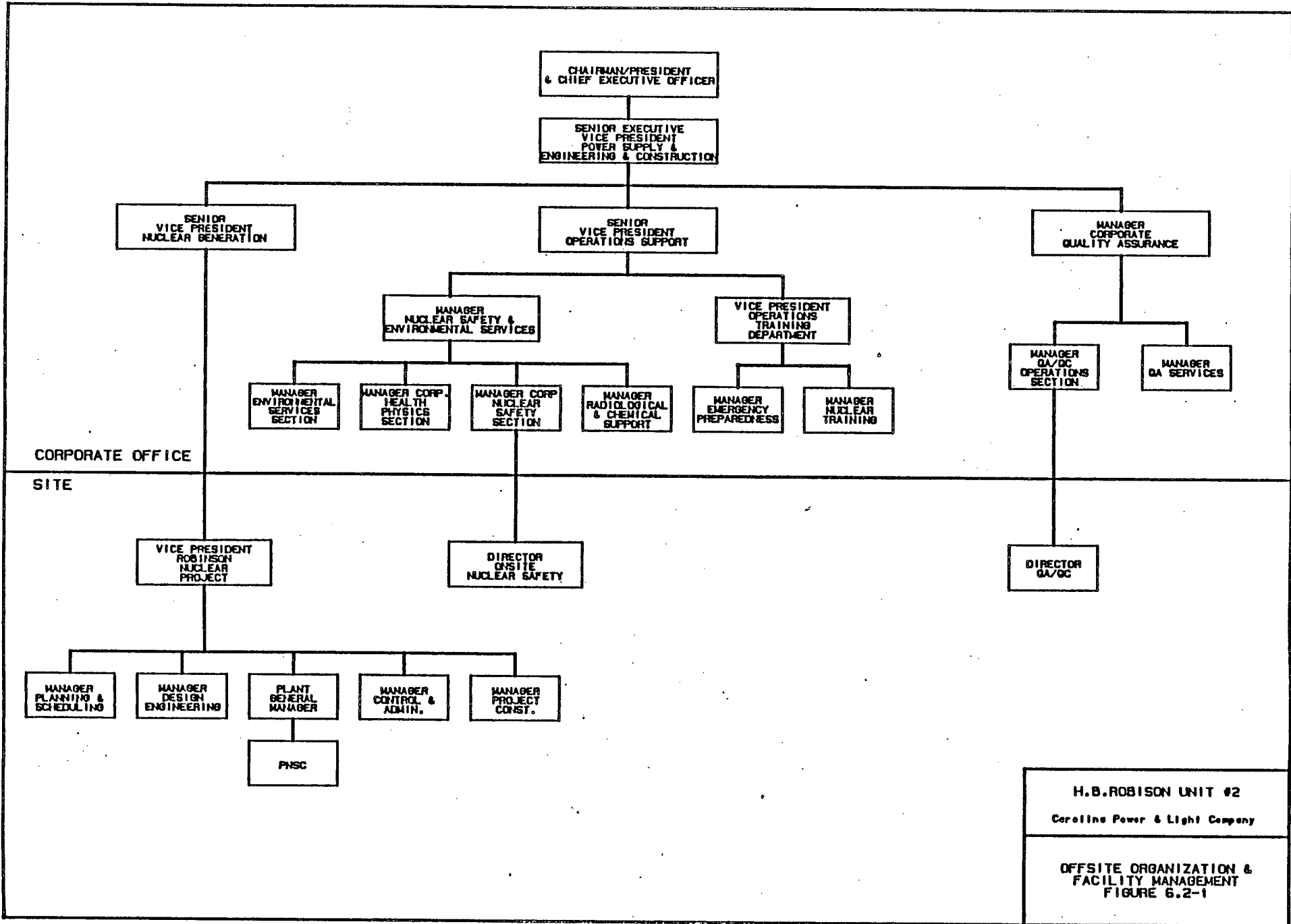
6.1 RESPONSIBILITY

6.1.1 The General Manager - Robinson Plant shall be responsible for overall facility operation except as described in Section 6.1.2 and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Manager - Control and Administration shall be responsible for facility physical security, emergency planning, and document control and shall delegate in writing the succession to this responsibility during his absence.

6.1.3 Disagreements between the General Manager - Robinson Plant and the Manager - Control and Administration in the areas of physical security, emergency planning, and document control will be resolved by the Vice President - Robinson Nuclear Project.

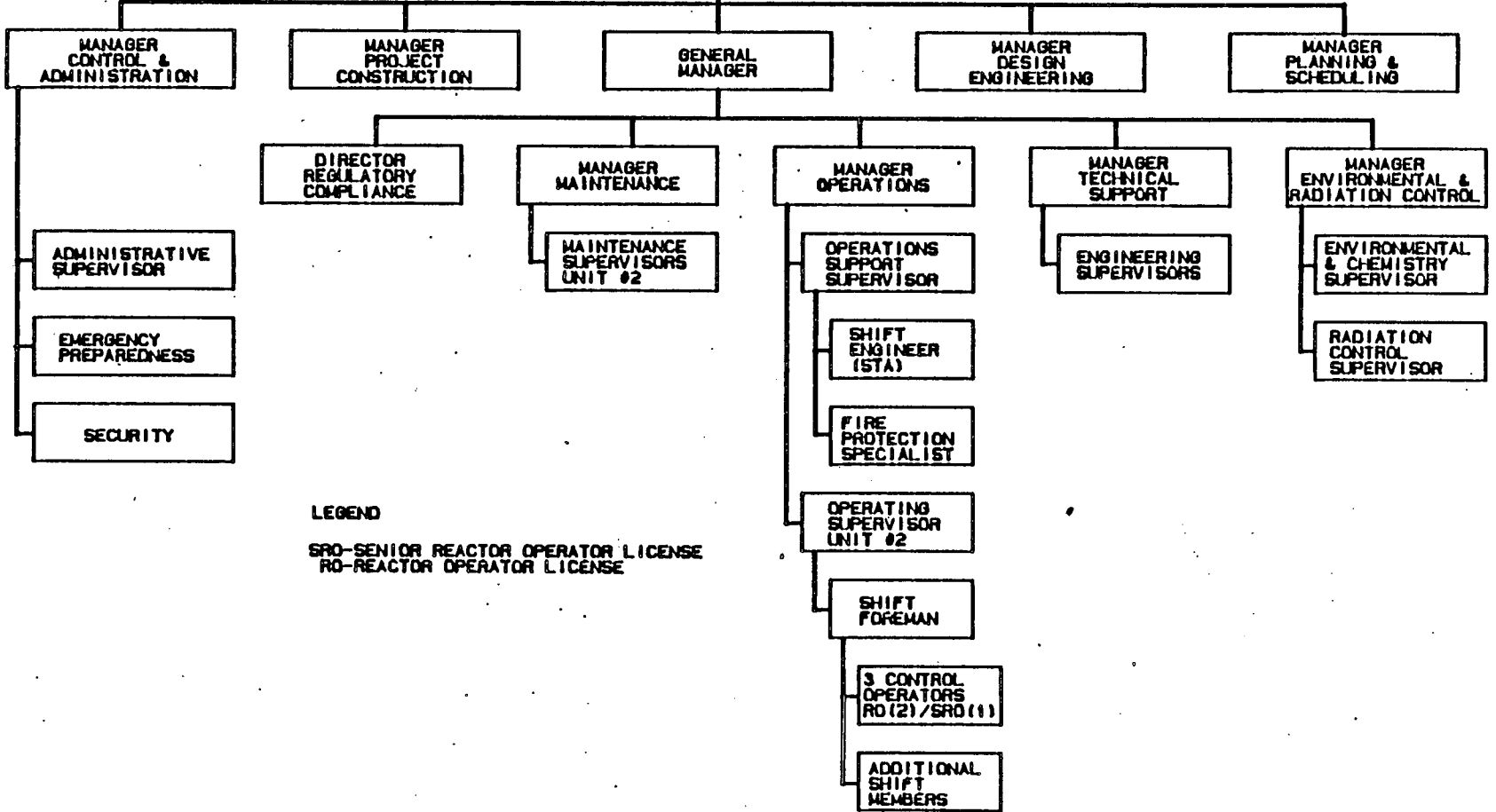
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6.2-3

H.B.ROBINSON UNIT #2  
 Caroline Power & Light Company  
 OFFSITE ORGANIZATION & FACILITY MANAGEMENT  
 FIGURE 6.2-1

VICE PRESIDENT  
ROBINSON  
NUCLEAR PROJECT



LEGEND  
SRO-SENIOR REACTOR OPERATOR LICENSE  
RO-REACTOR OPERATOR LICENSE

H. B. ROBINSON UNIT #2  
Cerule Power & Light Company  
FACILITY ORGANIZATION  
ROBINSON NUCLEAR PROJECT  
Figure 6.2-2

6.2-4

6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant and C&A staff shall be maintained under the direction of the Manager - Training 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 Manager - Operations 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.

6.5.1.1.3 Prior to approval, a second safety review shall be performed on all procedures, tests, or experiments that affect nuclear safety. This review shall be performed by an individual other than the individual who was the original preparer.

6.5.1.1.4 Following the two-party review, procedures, tests, and experiments and permanent changes thereto (other than editorial or typographical) which 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) Vice President - Robinson Nuclear Project, or designated alternate, or
- b) The Manager of the functional area affected by the procedures, tests, and experiments and permanent changes thereto as previously designated by the Vice President - Robinson Nuclear Project.

The individual approving the procedure, test, or experiment or change thereto shall be other than those who performed the required reviews.

The Vice President - 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 Vice President - 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 reviewer whose expertise may be necessary during the review to

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) Vice President - 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 Vice President - 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 Vice President - 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.

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 event and that provides recommendations to prevent recurrence. Such reports shall be reviewed by the Plant Nuclear Safety Committee and approved by the Plant General Manager or his designee and submitted to the Vice President - 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 Vice President - Robinson Nuclear Project 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 years related experience.

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 reportable events.
- f) Review of facility operations to detect potential nuclear safety hazards.
- g) Review of every unplanned on site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrences to the Vice President - Robinson Nuclear Project, Manager - Corporate Nuclear Safety, and the Manager - Corporate Quality Assurance.
- h) Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.
- i) Review of major changes to radioactive liquid, gaseous, and solid waste treatment systems.



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 Vice President - 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 Vice President - Robinson Nuclear Project and to the Manager - Corporate Nuclear Safety.

b) Recommendations and concerns shall be submitted to the Plant General Manager and Vice President - 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; Vice President - 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 Audit Personnel

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; Vice President - 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.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for events requiring immediate notification:

- a) The NRC shall be notified pursuant to the requirements of 10 CFR 50.72.
- b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Corporate Nuclear Safety Section, and the Vice President - Robinson Nuclear Project.

6.6.2 The following actions shall be taken for reportable events requiring a Licensee Event Report:

- a) A report shall be submitted to the NRC pursuant to the requirements of 10 CFR 50.73.
- b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Corporate Nuclear Safety Section, and the Vice President - Robinson Nuclear Project.

## REPORTING REQUIREMENTS

Information to be reported to the NRC, in addition to the reports required by Title 10, Code of Federal Regulations, shall be as indicated in the following sections.

Routine Reports

a) Startup Report. A summary report of plant startup and power escalation shall be submitted following (1) amendment to the license involving a planned increase in power level; (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier; and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests performed related to the startup and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

c) Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis. The report formats set forth in Appendices B, C, and D to Regulatory Guide 1.16 shall be completed in accordance with the instructions provided. The completed forms should be submitted by the tenth of the month following the calendar month covered by the report to the NRC.

d) Semiannual Radioactive Effluent Release Report. Routine radioactive effluent release reports covering the operation of the unit during the previous six months shall be submitted within 60 days after January 1 and July 1 of each year. Those portions of the report due within 60 days of January 1 and July 1 shall include:

1) A summary of the quantities of radioactive liquid and gaseous effluent and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Radioactive Materials in Liquid and Gaseous Effluents from Light Water Cooled Nuclear Power Plants" (Revision 1, June 1974), with data summarized on a quarterly basis following the format of Appendix B thereof.

2) The Radioactive Effluent Release Report to be submitted within 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint

6.9.2 Deleted

6.9.3 Special Reports

6.9.3.1 Special reports shall be submitted to the NRC within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

	<u>Area</u>	<u>Reference</u>	<u>Submittal Date</u>
a)	Containment Leak Rate Testing	4.4	Upon completion of each test.
b)	Containment Sample Tendon Surveillance	4.4	Upon completion of the inspection at 25 years of operation.
c)	Post-Operational Containment Structural Test	4.4	Upon completion of the test at 20 years of operation.
d)	Fire Protection System	3.14	As specified by limiting condition for operation.
e)	Overpressure Protection System Operation	3.1.2.1.e	Within 30 days of operation.
f)	Auxiliary Feedwater Pump	3.4	Within 30 days after becoming inoperable.

### 6.9.3.2 Special Radiological Effluent Reports

The special radiological effluent reports discussed below shall be the subject of written reports to the NRC within 30 days of the occurrence of the event.

a) Exceeding any of the limits prescribed by Specification 3.9.2.1, 3.9.4.1, and/or 3.9.5.1. This report shall include the following information:

- 1) The cause for exceeding the limit(s).
- 2) The corrective action(s) to be taken to reduce the releases of radioactive materials in the affected effluents (i.e., liquid, radionoble gas, and/or radioiodines, particulates) within the specification and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- 3) If any of the limits of Specification 3.9.2.1 were exceeded, the report must include a statement that no drinking water source exists that could be affected or include the results of radiological impact on finished drinking water supplied with regard to the requirements of 40 CFR 141, Safe Drinking Water Act.

b) Exceeding any of the limits prescribed by Specifications 3.16.1.1 and/or 3.16.3.1. This report shall include the following information:

- 1) Identification of equipment or subsystem that rendered the affected radwaste treatment system not operable.