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AUTH.NAME AUTHOR AFFILIATION
ZIMMERMAN,S.R. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests concurrence w/interpretation of wording contained in facilities Tech Specs re QA program.Concurrence w/ interpretation of ANSI N18.1-1971 required to continue evaluation of training/retaining programs.

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Carolina Power & Light Company

MAR 17 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory
Washington, D.C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
QUALITY ASSURANCE PROGRAM

Dear Mr. Denton:

This letter is a request of concurrence with our interpretation of the wording contained in the Brunswick Units No. 1 and 2 and H. B. Robinson Unit 2 Technical Specifications.

The Brunswick Units 1 and 2 and H. B. Robinson Unit 2 Technical Specification 6.4.1 states:

> "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 10CFR Part 55."

Carolina Power & Light Company's interpretation of ANSI N18.1-1971, is that the first paragraph in section 5.5 applies to training of the operating organization, while Sections 5.5.1 and 5.5.2 apply specifically to retraining and replacement training of licensed operators.

We believe our interpretation is supported by Proposed Revision 2 to Regulatory Guide 1.8, February 1979, regulatory position C.7 and in principle by the Second Proposed Revision 2 to Regulatory Guide 1.8, September, 1980.

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S/O

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

Your concurrence with our interpretation of ANSI N18.1-1971 is required for our continuing evaluation of our training/retraining programs.

Yours very truly,

S. R. Zimmerman
Manager
Licensing & Permits

WJD/MSG/lr (nrc10)

cc: Messrs. W. H. Haass
J. P. O'Reilly (NRC-RII)
G. Requa
D. B. Vassallo
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