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April 26, 1977

# REGULATORY DOCKET FILE COPY

File NG-3514(R)

Serial: NG-77-491

Director of Nuclear Reactor Regulation ATTN: Mr. Robert W. Reid, Chief Operating Reactors Branch No. 4 U. S. Nuclear Regulatory Commission Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET 50-261

LICENSE NO. DPR-23

REQUEST FOR LICENSE AMENDMENT-REVISION OF TECHNICAL SPECIFICATIONS

Dear Mr. Reid:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications for its H. B.Robinson Steam Electric Plant, Unit No. 2. This request reflects changes in the organizational structure of Section 6.0 of the Technical Specifications and corrects typographical errors in the Technical Specifications.

Attached are replacement pages for H. B. Robinson Steam Electric Plant, Unit No. 2 Technical Specifications which reflect these revisions. Appropriate changes are indicated by the vertical lines in the margin of the affected pages.

Yours very truly,

E. E. Utley
Senior Vice President
Power Supply

WH/gsm Attachment

Sworn to and subscribed before me this 26th day of April, 1977.

NOTARY

My Commission Expires October 4, 1981

Notary Public

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## 6.5.2.2 Responsibility

The Manager - Corporate Nuclear Safety under the Vice President - System Planning & Coordination Department is charged with the overall responsibility for administering the independent off-site nuclear safety review program as follows:

- a. Approves selection of the person or persons to conduct off-site safety reviews.
- b. Has access to the plant operating records and operating personnel in performing the independent reviews.
- c. Prepares and retains written records of reviews.
- d. Assures independent safety review is conducted on all items required by Section 6.5.2.4.
- e. Distributes reports and other records to appropriate managers.

### 6.5.2.3 Personnel

- a. Personnel assigned responsibility for independent reviews shall be specified in technical disciplines, and shall collectively have the experience and competence required to review problems in the following areas:
  - 1. Nuclear power plant operations
  - 2. Nuclear engineering
  - 3. Chemistry and radiochemistry
  - 4. Metallurgy
  - 5. Instrumentation and control
  - 6. Radiological safety

- b. Recommendations and concerns will be submitted to the Manager -Nuclear Generation within 14 days of determination.
- c. A summation of Corporate Nuclear Safety Section recommendations and concerns will be submitted to the Company Chief Executive Officer; Chief Operating Officer; Senior Vice President Power Supply; Vice President System Planning & Coordination; Plant Manager and others, as appropriate on at least a bi-monthly frequency.
- 6.5.2.6 The Corporate Nuclear Safety review program shall be conducted in accordance with written, approved procedures.

## 6.5.3 Independent Off-Site Quality Assurance Audit Program

## 6.5.3.1 Purpose

Audits of activities shall be performed under the cognizance of the Corporate Quality Assurance Audit (CQAA) Section. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per six months.
- d. The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix "B", 10CFR50, at least once per two years.
- e. The Emergency Plan and implementing procedures at least once per two years.

- f. The Security Plan and implementing procedures at least once per two years.
- g. Any other area of facility operation considered appropriate by the Corporate Quality Assurance Audit Section or the Senior Vice President - Power Supply.

# 6.5.3.2 Responsibility

The Manager - Corporate Quality Assurance Audit is charged with the overall responsibility for the corporate quality assurance audit program as follows:

- a. Selects auditors.
- b. Has access to records and personnel necessary in performing the audits.

## 6.5.3.3 Personnel

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

#### 6.5.3.4 Reports

Results of audit are approved by the Manager - Corporate Quality Assurance Audit and transmitted directly to the Company Chief Executive Officer and the Chief Operating Officer as well as to the Senior Vice President - Power Supply, Vice President - System Planning & Coordination, 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 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. Each Reportable Occurrence Report shall be submitted to the Manager of Corporate Nuclear Safety and the Manager of Nuclear Generation.

## 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 10CFR50.36(c)(1)(i) shall be complied with immediately.
  - b. The Safety Limit violation shall be reported to the Commission, the Manager of Nuclear Generation and the Manager of Corporate Nuclear Safety 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.

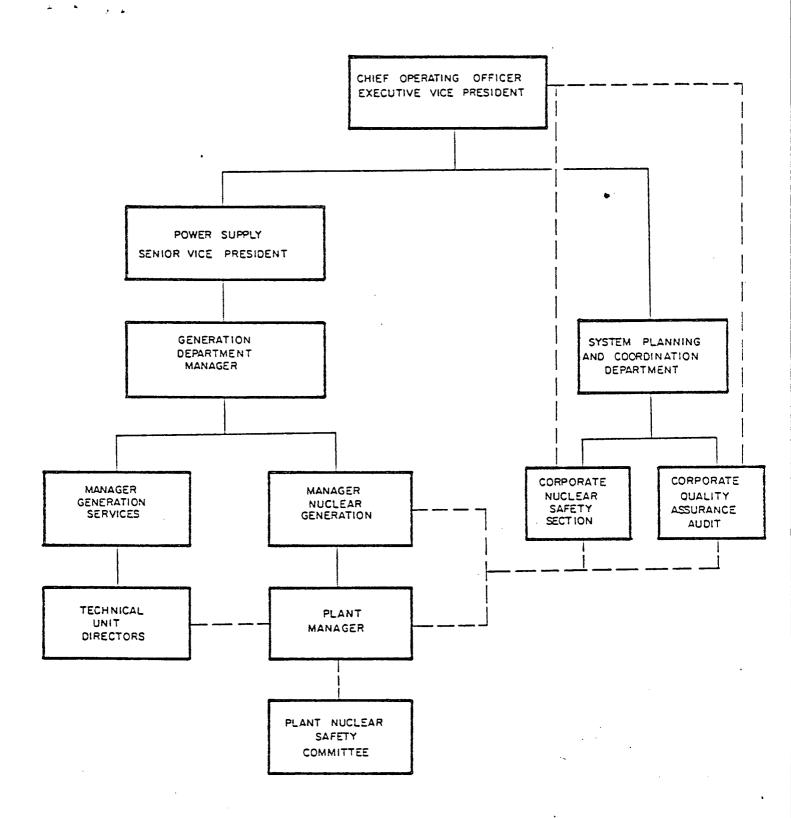


Figure 6.2-1