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RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards responses to draft SER Open Items 172 & 173.Resumes of personnel to fill positions of environ & radiation control manager & radiation control supervisor will be added to FSAR when positions filled.

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Carolina Power & Light Company

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Serial LAP-83-138

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

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NOS. 1 AND 2
DOCKET NOS. 50-400 AND 50-401
DRAFT SAFETY EVALUATION REPORT RESPONSES
RADIOLOGICAL ASSESSMENT BRANCH

Dear Mr. Denton:

Carolina Power & Light Company (CP&L) hereby transmits one original and forty copies of the responses to the Shearon Harris Nuclear Power Plant Draft Safety Evaluation Report (DSER) CP&L Open Item Nos. 172 and 173.

Carolina Power & Light Company will be providing responses to other Open Items in the DSER shortly.

Yours very truly,

M. A. McDuffie
Senior Vice President
Engineering & Construction

PS/ce (6735PSA)
Attachment

cc: Mr. Seymour Block (NRC-RAB)
Mr. N. Prasad Kadambi (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)
Mr. J. P. O'Reilly (NRC-RII)
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Shearon Harris Nuclear Power Plant (SHNPP)
Draft Safety Evaluation Report (DSER)
Radiological Assessment Branch
Open Item 172 (DSER Section 12.5.1, Page 12-13)

The Environmental and Radiation Control Manager will implement and enforce the SHNPP radiation protection support program. This will be done through the Radiation Control Supervisor. However, the ultimate responsibility for meeting the ALARA objectives of the radiation protection program lies with the Plant General Manager. Personnel to fill the positions of the Environmental and Radiation Control Manager and the Radiation Control Supervisor have not yet been selected at SHNPP; thus, resumes are not available for review to ensure that the person filling either of those staff positions has the Radiation Protection Manager qualifications specified in RG 1.8. Therefore, this is an open item.

Response

Resumes are unavailable for the Environmental and Radiation Control Manager and the Radiation Control Supervisor at this time. The qualifications of each applicant are reviewed against the criteria of Regulatory Guide 1.8 to ensure background standards are met. When these positions are filled, resumes will be added to Final Safety Analysis Report Section 13.1.3.2. Carolina Power & Light Company considers this to be a confirmatory item.

Shearon Harris Nuclear Power Plant (SHNPP)
Draft Safety Evaluation Report (DSER)
Radiological Assessment Branch
Open Item 173 (DSER Section 12.5.1, page 12-13)

QUESTION:

The Harris plant organization chart shows the Environmental and Radiation Control Manager reporting to the Manager, Plant Operations. It is the staff's position that in matters relating to radiological health and safety, the individual responsible for the radiation protection support group's activities has direct responsibility to both employees and management. This responsibility can best be fulfilled if the Environmental and Radiation Control Manager not only has access to the General Plant Manager, but also is independent of the plant operations management, whose prime responsibility is continuity or improvement of station operability. This apparent lack of independence is also an open item.

Response

When the first CP&L nuclear plant began operation, the plant organization consisted of a Plant Superintendent with an Operating Supervisor, Maintenance Supervisor, and an Engineering Supervisor reporting to him. As the individual roles of operations, maintenance, and engineering personnel became more complex and demanding, additional personnel were added to the plant staffs.

As the plant staff evolved, so, too, did the management structure in order to maintain control of the many staff activities. In addition to the changes in management structure, the management positions have gradually been upgraded to provide the necessary authority and responsibility required to perform the respective management functions. The position of Plant General Manager has replaced the previous position of Plant Superintendent. The positions of Manager - Maintenance, Manager - Operations, and Manager - Technical Services have replaced the previous positions of Maintenance Supervisor, Operating Supervisor, and Engineering Supervisor respectively. With the increased emphasis CP&L has placed on ALARA, the position directly responsible for Radiation Protection and Control has been upgraded from a Foreman to the Manager - Environmental & Radiation Control. While the Plant General Manager has ultimate responsibility for overall plant operations, a new position, Manager - Plant Operations, was created to meet the managerial demands of day-to-day plant operations. This position has the same authority and responsibility for the safe operation of the plant as did the previous Plant Superintendent. The positions of Manager - Environmental & Radiation Control, Manager - Maintenance, and Manager - Operations, report to the Manager - Plant Operations. The objective of having these three disciplines work as an integral unit is to develop a close coordination of operations and maintenance activities with a constant emphasis on the Health Physics and ALARA programs. This objective has been realized with great success.

As indicated in the draft Technical Specifications, Section 6, Figure 6.2.1-1, Offsite Organization (attached), the Manager - Environmental & Radiation Control has direct and open lines of communication with the Plant General Manager, Manager - Corporate Health Physics, and the Manager - Radiological & Chemical Support for matters regarding the radiological health and safety of employees and the public. The Manager - Environmental & Radiation Control is charged with the responsibility and is encouraged to use these lines of communications to ensure the company policy for Health Physics and ALARA are implemented.

Carolina Power & Light Company feels that the current organization meets the intent of NRC's guidance, since the Manager - E&RC does not report to the Manager - Operations or Manager - Maintenance but reports to the next level of management, the Manager - Plant Operations. This organization includes the additional check and balance of encouraging the Manager - E&RC to communicate directly to the Plant General Manager and Corporate Managers in Health Physics matters and unresolved concerns.

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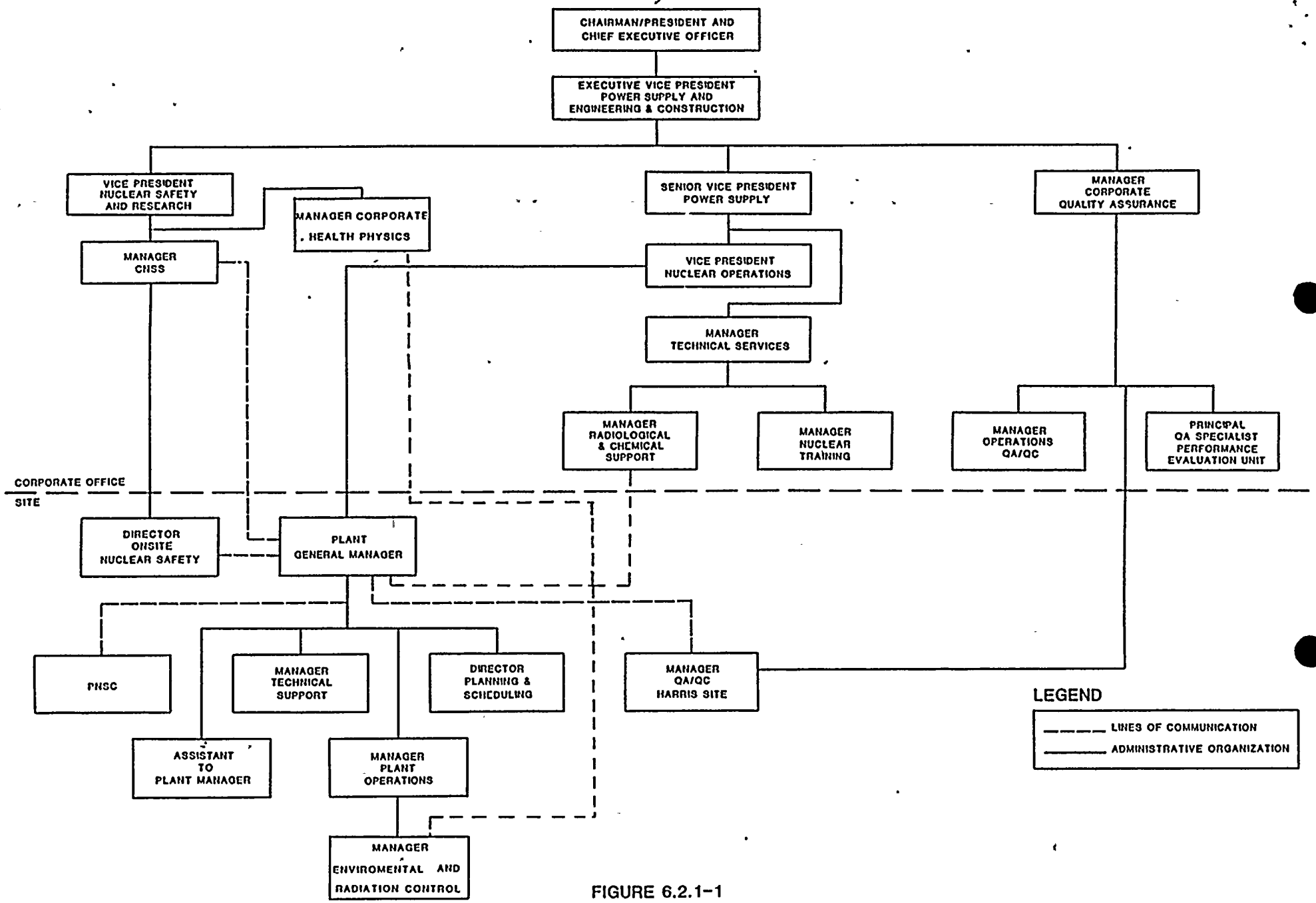
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MANAGER PLANT OPERATIONS
MANAGER ENVIROMENTAL AND RADIATION CONTROL
LEGEND
LINES OF COMMUNICATION
ADMINISTRATIVE ORGANIZATION

FIGURE 6.2.1-1