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FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
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KRICH,R.M. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amend to license DPR-23, requesting rev to TS
to remove current TS requirement for Manager-Operations to
hold SRO license & add requirement for Manager-Shift
Operations to hold SRO license.

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Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29550

10 CFR 50.90

Robinson File No.: 13510H
Serial: RNP/94-0930

MAY 20 1994

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
LICENSE REQUIREMENT FOR MANAGER - OPERATIONS

Gentlemen:

In accordance with 10 CFR 50.90, Carolina Power & Light (CP&L) Company hereby requests a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2. The proposed amendment will remove the current TS requirement for the Manager - Operations to hold a Senior Reactor Operator's license and add a requirement for the Manager - Shift Operations to hold a Senior Reactor Operator's license. A similar amendment has been previously approved for the Shearon Harris Nuclear Power Plant on March 2, 1989. Due to the importance of filling the vacant Manager - Operations position, we request that this request be processed as expeditiously as possible.

Enclosure 1 provides an affidavit regarding this license amendment request as required by 10 CFR 50.30 (b).

Enclosure 2 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 3 details, in accordance with 10 CFR 50.91(a), the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 4 provides an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 5 provides page change instructions for incorporating the proposed revisions.

Enclosure 6 provides the proposed Technical Specification pages.

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In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of the proposed license amendment.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendment, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the amendment.

Please refer any questions regarding this submittal to Mr. K. R. Jury at (803) 383-1363.

Yours very truly,



R. M. Krich
Manager - Regulatory Affairs

JSK/lhg

Enclosures:

1. Affidavit
2. Basis for Change Request
3. 10 CFR 50.92 Evaluation
4. Environmental Considerations
5. Page Change Instructions
6. Technical Specification Pages

cc: Mr. Max K. Batavia, Chief-Bureau of Radiological Health
Mr. S. D. Ebnetter, Regional Administrator, USNRC Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP
Attorney General (SC)

ENCLOSURE 1

AFFIDAVIT

C. S. Hinmant, having been first duly sworn, did depose and say that the information contained in letter RNP/94-0930 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

CS Hinmant

George Anne Stein

Notary (Seal)

My commission expires: 6/5/96

ENCLOSURE 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
LICENSE REQUIREMENT FOR MANAGER - OPERATIONS

BASIS FOR CHANGE REQUEST

Background

The reason for this proposed Amendment is to delineate the qualifications for the Manager - Operations, and the Manager - Shift Operations positions. These qualifications will be added as Technical Specification (TS) 6.3.2 (new), which will meet the intent of ANSI 18.1-1971. This allows the facility flexibility to staff the Manager - Operations position with a qualified and experienced individual who does not necessarily hold a Senior Reactor Operator's license at the Robinson Plant.

Proposed Change

The proposed Amendment involves two changes which are summarized as follows:

1. An exception will be added within TS 6.3.1 regarding the requirement for the Manager - Operations position to hold a Senior Reactor Operator's (SRO) license.
2. TS 6.3.2 (new) will be added to describe the qualifications (license requirement) for the Manager - Operations and the Manager - Shift Operations positions. This new section will require the Manager - Operations to "hold or have held an SRO license for either the H. B. Robinson Plant or a similar plant," and will require the Manager - Shift Operations to hold an SRO license at H. B. Robinson. This will meet the intent of the ANSI standard and a similar change has been previously approved by the NRC for the Shearon Harris Nuclear Power Plant.
3. TS 6.3.2 (old), and 6.3.3 will be renumbered accordingly to allow for the addition of TS 6.3.2 (new).

Basis

The current H. B. Robinson Unit No. 2 Technical Specification (TS) 6.3 is not detailed with respect to the site specific Operations management positions. TS requires that the facility staff performing similar or equivalent to functions delineated in ANSI N18.1 - 1971, shall meet or exceed ANSI N18.1 - 1971 with regards to the minimum qualifications for comparable positions. However, as described below, these qualifications regarding license requirements will now be delineated separately for the specific Operations management positions for the H. B. Robinson Steam Electric Plant.

ENCLOSURE 2 (Continued)

The responsibilities for the Manager - Operations require a technically sound background, knowledge of nuclear plant operations, and a significant amount of time to administratively manage these functions. However, the in-depth, plant-specific knowledge, which is demonstrated by maintaining an SRO license, and is needed for the day-to-day supervision of the operating crews, is not essential for the Manager - Operations position. The functions requiring such knowledge are performed by the Manager - Shift Operations.

Currently at the Robinson Plant, the position of Manager - Shift Operations exists between the operating shifts and the Manager - Operations. This position is a "middle manager position" that shall hold an SRO license as required by this proposed TS amendment. This requirement is consistent with ANSI 18.1 - 1971 requirement for the Operations Manager. However, as proposed by this TS amendment, the requirement for the Manager - Operations will be revised such that this position shall either hold or have held an SRO license for the H. B. Robinson Plant or a similar unit. The delineated responsibilities for this management hierarchy will ensure the appropriate level of operator qualifications exists for the Manager - Operations, since this person does not directly supervise the shift operators.

Conclusions

The proposed amendment meets the intent of the commitment to ANSI 18.1-1971.

ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
LICENSE REQUIREMENT FOR MANAGER - OPERATIONS

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards determination. The bases for this determination are as follows:

Proposed Change

1. An exception will be added within TS 6.3.1 regarding the requirement for the Manager - Operations position to hold a Senior Reactor Operator's (SRO) license.
2. TS 6.3.2 (new) will be added to describe the qualifications (license requirement) for the Manager - Operations and the Manager - Shift Operations positions. This new section will require the Manager - Operations to "hold or have held an SRO license for either the H. B. Robinson Plant or a similar plant," and will require the Manager - Shift Operations to hold an SRO license. This will meet the intent of the ANSI standard and a similar change has been previously approved by the NRC for the Shearon Harris Nuclear Power Plant.
3. TS 6.3.2 (old), and 6.3.3 will be renumbered accordingly to allow for the addition of TS 6.3.2 (new).

Basis

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The total number of senior reactor operator licensed personnel on shift remains unchanged. The change to provide a middle level of management will lessen the burden of the daily shift operations placed on the Manager - Operations. This will allow for more effective overall management of the Operations Unit. Requiring the Manager - Shift Operations to hold an SRO license will assure that supervision of operator activities continues to be performed by a senior licensed individual. The proposed changes to the Operations management organization do not involve physical alterations of the plant configuration or changes in setpoints or operating parameters. Therefore, there would be no increase in the probability or consequences of an accident previously evaluated.

ENCLOSURE 3 (Continued)

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. As described above, these changes affect the organization of the Operations Unit. They do not represent any appreciable change in the current methodologies; they merely update the TS to reflect current personnel organization configuration and standards. The proposed changes to the Operations management organization do not involve physical alterations of the plant configuration or changes in setpoints or operating parameters. Therefore, the changes proposed do not create the possibility of a new or different kind of accident from any previously evaluated.
3. The proposed amendment does not involve a significant reduction in the margin of safety. The changes proposed do not reduce the number of senior reactor operator licensed personnel on shift. The changes to the Operations organization, as reflected in the proposed change, will enhance the overall effectiveness of plant operations and will serve to improve nuclear safety. There are no changes to the plant configuration or changes in setpoints or procedures. Therefore, the changes proposed have no affect on the facility's margin of safety.

ENCLOSURE 4

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
LICENSE REQUIREMENT FOR MANAGER - OPERATIONS
ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluent that may be released offsite; (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change

The proposed Amendment involves two changes which are summarized as follows:

1. An exception will be added within TS 6.3.1 regarding the requirement for the Manager - Operations position to hold a Senior Reactor Operator's (SRO) license.
2. TS 6.3.2 (new) will be added to describe the qualifications (license requirement) for the Manager - Operations and the Manager - Shift Operations positions. This new section will require the Manager - Operations to "hold or have held an SRO license for either the H. B. Robinson Plant or a similar plant," and will require the Manager - Shift Operations to hold an SRO license. This will meet the intent of the ANSI standard and a similar change has been previously approved by the NRC for the Shearon Harris Nuclear Power Plant.
3. TS 6.3.2 (old), and 6.3.3 will be renumbered accordingly to allow for the addition of TS 6.3.2 (new).

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 3, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluent that may be released offsite. The proposed changes merely provides for an organization of Operations management structure and delineates the responsibilities of the managers. Therefore, these changes cannot affect the types or amounts of any effluent released from the site.

ENCLOSURE 4 (Continued)

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed changes are not associated with occupational exposure and are administrative in nature. An organization restructure has no impact on work in or around a radiation environment. Therefore, this change does not involve a change in individual or cumulative occupational exposure.

ENCLOSURE 5
H.B.ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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PAGE CHANGE INSTRUCTIONS

<u>Removed Page</u>	<u>Inserted Page</u>
6.3-1	6.3-1

ENCLOSURE 6

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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TECHNICAL SPECIFICATION PAGE