

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 Manager - Robinson Nuclear Project.

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6.2 ORGANIZATION

Offsite

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

6.2.2 Definitions

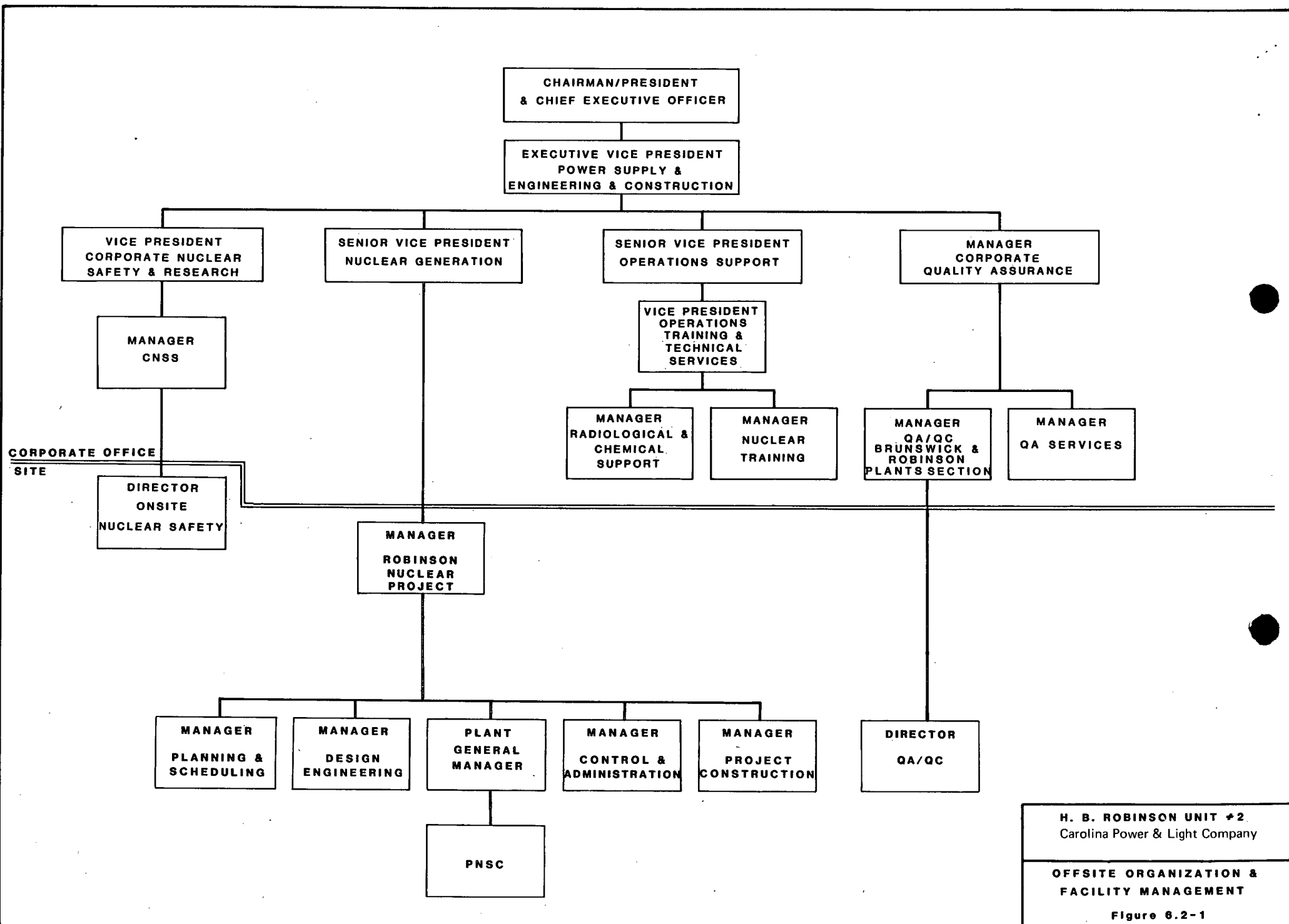
- a. Personnel reporting to the General Manager - Robinson Plant shall be identified in Section 6 of the Technical Specifications as the plant staff.
- b. Personnel reporting to the Manager - Control and Administration shall be identified in Section 6 of the Technical Specifications as the C&A staff.

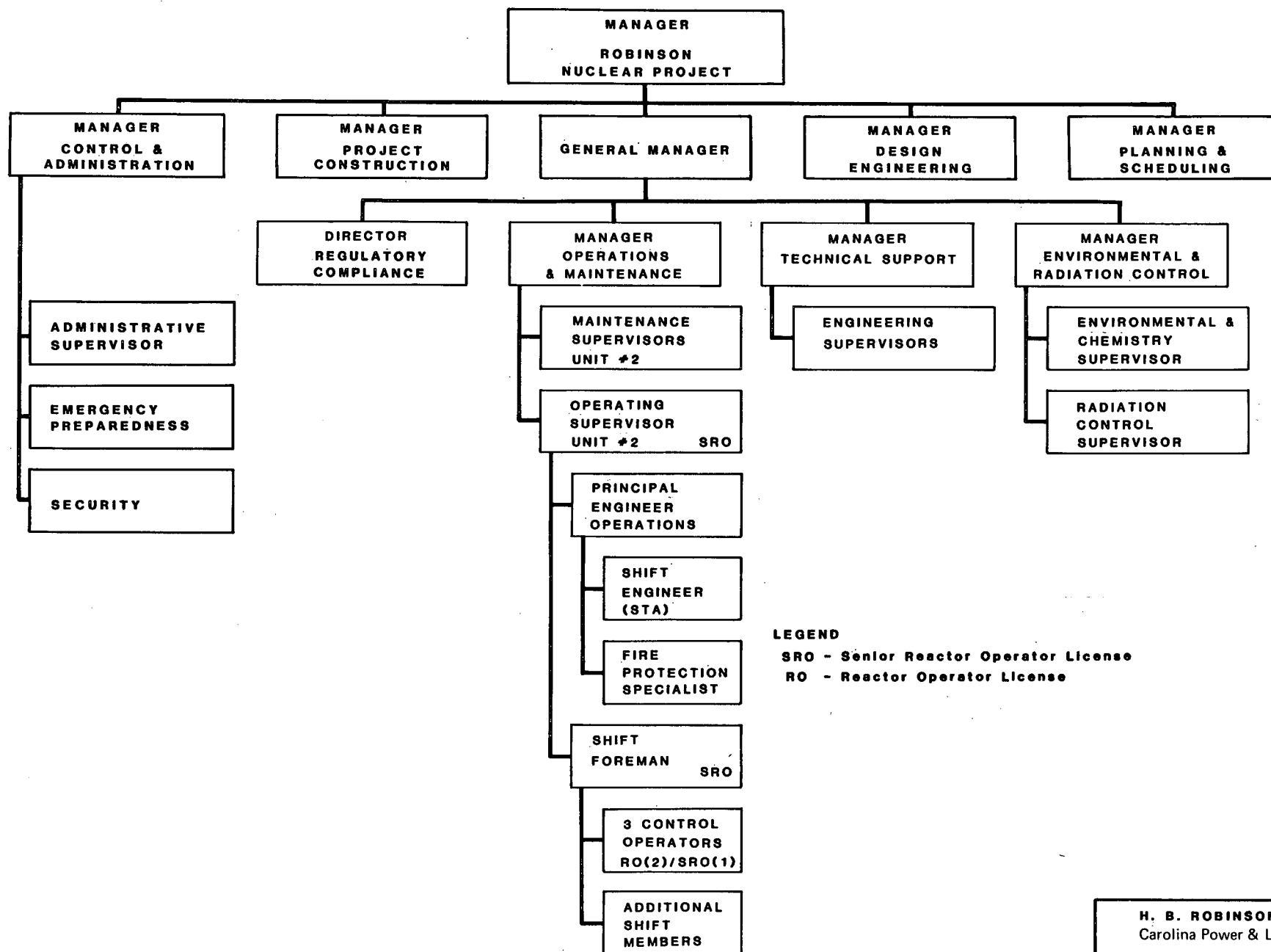
Facility Staff

6.2.3 The Robinson Nuclear Project organization shall be as shown in Figure 6.2-2 and:

- a. The shift complement during hot operations shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Senior Control Operator holding a Senior Reactor Operator's license, two Control Operators each holding a Reactor Operator's license, two additional shift members, and one Shift Technical Advisor.
- b. The shift complement during cold shutdown shall consist of at least one Shift Foreman holding a Senior Reactor Operator's license, one Control Operator holding a Reactor Operator's license, and one additional shift member.
- c. At least one licensed Operator shall be in the control room when fuel is in the reactor.

- d. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown, and during recovery from reactor trips.
- e. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- f. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- g. A Plant Fire Brigade of at least 5 members shall be maintained on site at all times. This excludes three members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.





H. B. ROBINSON UNIT #2
 Carolina Power & Light Company

FACILITY ORGANIZATION
ROBINSON NUCLEAR PROJECT
 Figure 6.2-2

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the plant and C&A staff shall meet or exceed ANSI N18.1-1971 with regard to the minimum qualifications for comparable positions.

6.3.2 The Manager - Environmental and Radiation Control shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The Guide says that he shall have a bachelor's degree or equivalent in a science or engineering subject. Equivalent in this case is defined as follows:

- (a) 4 years of formal schooling in science or engineering,
- (b) 4 years of applied radiation protection experience at a nuclear facility,
- (c) 4 years of operational or technical experience/training in nuclear power, or
- (d) Any combination of the above totaling 4 years.

This requirement is in addition to the requirement for five years of professional experience in applied radiation protection.

6.3.3 The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

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 Director - 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 & Maintenance 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. Manager - 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 Manager - 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 Manager - 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 Manager - 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

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.

- 6.5.1.1.5 Temporary changes to procedures, tests, or experiments may be approved by two members of the plant or C&A management staff, at least one of whom holds a Senior Reactor Operator License if such change does not change the intent of the original procedure, test, or experiment. Temporary changes shall be documented and, within 21 days of receiving temporary approval, be reviewed in accordance with Specifications 6.5.1.1.2, 6.5.1.1.3, and 6.5.1.1.4 and incorporated as a permanent change or deleted.
- 6.5.1.1.6 Those procedures, tests, or experiments and changes thereto that constitute an unreviewed safety question, or involve a change to Technical Specifications shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such procedures, tests, or experiments and changes shall be reviewed by the Corporate Nuclear Safety Section prior to implementation.
- 6.5.1.1.7 Procedures, tests, or experiments, which constitute a change to the FSAR shall also be reviewed by the Corporate Nuclear Safety Section. These reviews may be conducted after plant Management approval, and implementation may proceed prior to completion of review as provided for by 10 CFR 50.59(a)(1).
- 6.5.1.2 Modifications
 - 6.5.1.2.1 A safety analysis shall be prepared for all modifications that affect nuclear safety. The analysis shall include a written determination of whether or not the modification is a change in the facility as described in the FSAR, involves a change to the Technical Specifications, or constitutes an unreviewed safety question as defined in 10 CFR 50.59(a)(2).

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) Manager - Robinson Nuclear Project, or designated alternate,
or
- b) General Manager, Robinson Plant, or designated alternate, or
- c) Manager - Technical Support.

The individual approving these modifications shall be other than those who performed the required reviews.

The Manager - 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 Manager - 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 occurrence and that provides recommendations to prevent recurrence. Such reports shall be reviewed by the PNSC and approved by the Plant General Manager or his designee and submitted to the Manager - 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 Manager - 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 (2) years related experience.

6.5.1.6 Plant Nuclear Safety Committee (PNSC)

6.5.1.6.1 a. As an effective means for the regular overview, evaluation, and maintenance of plant operational safety, a Plant Nuclear Safety Committee (PNSC) is established.

b. The committee shall function, through the utilization of subcommittees, audits, investigations, reports, and/or performance of reviews as a group, to advise the General Manager on all matters related to nuclear safety.

6.5.1.6.2 The PNSC shall be composed of the following:

Chairman - General Manager or designated alternate

Member - Manager - Operations and Maintenance or designated alternate

Member - Manager - Technical Support or designated alternate

Member - Director - Regulatory Compliance or designated alternate

Member - Manager - Environmental & Radiation Control or designated alternate

Member - Director - QA/QC or designated alternate

6.5.1.6.3 Alternates shall be appointed in writing by the General Manager to serve on a temporary basis. All alternates shall, as a minimum, meet qualification criteria specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel, or for those disciplines not listed in Section 4.4, the equivalent of the Section 4.4 requirement.

6.5.1.6.4 The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate.

- 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 events requiring 24 hour notification to the NRC.
 - f. Review of facility operations to detect potential nuclear safety hazards.
- 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 Manager - 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 Manager - Robinson Nuclear Project and to the Manager - Corporate Nuclear Safety.

recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

- (5) Any other matter involving safe operation of the nuclear power plant that the Manager - Corporate Nuclear Safety Section deems appropriate for consideration or which is referred to the Manager - Corporate Nuclear Safety Section by the on-site operating organization or by other functional organization units within Carolina Power & Light Company.

- (6) Reports and minutes of the PNSC.

6.5.2.2 Results of Corporate Nuclear Safety reviews, including recommendations and concerns, shall be documented.

- a. Copies of documented reviews shall be retained in the CNS files.
- b. Recommendations and concerns shall be submitted to the plant General Manager and Manager - 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; Executive Vice President - Power Supply and Engineering & Construction; Senior Vice President - Nuclear Generation; Manager - Robinson Nuclear Project; Vice President - Corporate Nuclear Safety & Research; 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 QA Services Section

6.5.3.1 The QA Services Section of the Corporate Quality Assurance Department shall perform audits of plant activities. Specific audit subjects are defined in Specification 6.5.3.2.d.

6.5.3.2 The Manager - QA Services Section under the Manager - Corporate Quality Assurance is charged with the overall responsibility for administering the quality assurance audit program as follows:

- a) Approves selection of the individual(s) to conduct quality assurance audits.
- b) Has access to the plant operating records and operating personnel in performing the quality assurance audits.
- c) Prepares and retains written records of audits.
- d) Assures quality assurance audits are conducted on the following subjects:
 - 1) The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
 - 2) The training and qualifications of the entire facility staff at least once per 12 months.
 - 3) 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 6 months.

- (4) The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50, at least once per 24 months.
 - (5) The Emergency Plan and implementing procedures at least
 - once per 24 months.
 - (6) The Security Plan and implementing procedures at least once per 24 months.
 - (7) The Facility Fire Protection Program and implementing procedures at least once per 24 months.
 - (8) Any other area of facility operation considered appropriate by the Corporate Quality Assurance QA Services Section; the Executive Vice President - Power Supply and Engineering & Construction; or the Senior Vice President - Nuclear Generation.
- e. Distribute reports and other records to appropriate managers.

6.5.3.3

- 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 the Executive Vice President - Power Supply and Engineering & Construction; the Senior Vice President - Nuclear Generation; Manager - Robinson Nuclear Project; Plant General Manager; and the Vice President - Corporate Nuclear Safety & Research; 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 for reportable occurrences:

- a. The NRC shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.2.
- b. Each reportable occurrence requiring 24-hour notification to the NRC shall be reviewed in accordance with 6.5.1.6.6 and submitted to the Manager - Corporate Nuclear Safety Section, and the Manager - Robinson Nuclear Project.

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 10 CFR 50.72 shall be complied with.
- b. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with.
- c. The Safety Limit violation shall be reported to the NRC Region II, the Manager - Robinson Nuclear Project, and to the Manager - Corporate Nuclear Safety Section, within 24 hours.
- d. A Safety Limit Report shall be prepared. The report shall be reviewed in accordance with specification 6.5.1.6.6. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems, or structures; and (3) corrective action taken to prevent recurrence.
- e. The Safety Limit Violation Report shall be submitted to the NRC Region II, Manager - Robinson Nuclear Project, and the Manager - Corporate Nuclear Safety Section within 14 days of the violation.