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 CUTTER, A. B. Carolina Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Application for amend to License DPR-23, revising Tech Specs to reflect administration changes in organization structure, staff qualifications, plant nuclear safety committee & mod approval authority. Fee paid.

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Carolina Power & Light Company

APR 8 1986

SERIAL: NLS-85-179

Director of Nuclear Reactor Regulation  
Attention: Mr. Lester S. Rubenstein, Director  
PWR Project Directorate #2  
Division of PWR Licensing - A  
United States Nuclear Regulatory Commission  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR LICENSE AMENDMENT  
STAFF QUALIFICATIONS AND ORGANIZATIONAL CHANGES

Dear Mr. Rubenstein:

#### SUMMARY

Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2) in accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101. This request includes five independent changes of an administrative nature which affect the organizational structure and qualifications of the staff supporting HBR2 operation.

#### SIGNIFICANT HAZARDS

CP&L has reviewed these requests in accordance with the standards set forth in 10 CFR 50.92 and determined that the proposed TS revisions involve no significant hazards consideration. This involved an evaluation of the proposed change with respect to the criteria established in 10 CFR 50.92. Specific justification is provided to demonstrate that operation of the facility in accordance with the proposed change would not:

- (1) *involve a significant increase in the probability or consequences of an accident previously evaluated; or*
- (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.*

In addition, the justifications of the No Significant Hazards Determination is augmented, where applicable, by consideration of the guidance concerning application of the standard as provided through examples in the Federal Register on April 6, 1983 (48 FR 14864). The basis upon which each requested amendment has been determined to present no significant hazard is presented along with the description of each specific amendment provided below.

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## DESCRIPTION OF CHANGES

(1) CORPORATE REORGANIZATION - Due to a recent reorganization of the corporate management structure, the "Corporate Organization Chart" depicted in Figure 6.2-1 on page 6.2-3 of the TS must be modified to reflect the current management structure. Sections 6.5.2, 6.5.2.1, 6.5.2.2.C, and 6.5.3.4 have also been updated to reflect the revised organization titles.

This change involves several areas within the corporate organization where managerial responsibilities have been realigned and departments restructured in order to provide better continuity in the areas of responsibilities within departments and sections and to better utilize the specific expertise of the individuals filling managerial positions. The change does not reflect any major change in management philosophy or corporate directives which might adversely affect the quality of the technical or managerial support of the plant.

In addition to the organizational changes, a statement has been added to Section 6.2.1 which would allow future changes to the corporate organization to be made without prior amendment to Figure 6.2-1 provided an amendment request is submitted within three months of the effective date of the change.

CP&L has reviewed this change request in accordance with the previously listed 10 CFR 50.92 criteria and determined that none of the criteria is adversely affected. The changes would not involve a significant increase in the probability or consequences of a previously evaluated accident; create the possibility of a new different kind of accident; or involve a significant reduction in a margin of safety because these changes are administrative in nature and do not reflect a major change in management philosophy, policies, or practices relevant to the safe operation of the HBR2 facility. As such, CP&L has determined that the change does not significantly affect the plant's operation or capabilities to prevent and/or mitigate the consequences of an accident. Therefore, the change would not involve a significant hazards consideration.

(2) POSITION TITLE CHANGE - On Figure 6.2-2, page 6.2-4 of the TS, the position of "Principal Engineer Operations" has been retitled as "Operations Support Supervisor." This title more appropriately relates to the support functions of this group and is more consistent with the title of the other position of "Operating Supervisor" which reports to the "Manager Operations." This is a title change only and does not involve any change of qualifications or responsibilities associated with the position.

In addition, a statement has also been added to Section 6.2.3 allowing changes to the organization to be made without prior license amendment request provided the change request is submitted within three months.

CP&L has reviewed this amendment request in accordance with the previously listed 10 CFR 50.92 significant hazards criteria and determined that none of the criteria is adversely affected. The changes would not involve a significant increase in the probability or consequences of a previously evaluated accident; create the possibility of a new different kind of accident; or involve a significant reduction in a margin of safety because the amendment request is editorial in nature, and has no affect on the organizational functions, administrative controls, or operational procedures and parameters relative to the Robinson Plant. Therefore, this change has no impact on any safety aspect of the plant relative to postulated or conceivable accident scenarios or any defined margins of safety. As such, the change would not involve a significant hazards consideration.

Furthermore, the change is clearly consistent with the guidance provided in paragraph (i) of the "Examples of Amendments Considered Not Likely to Involve Significant Hazards Consideration." That example states that an amendment would likely be considered to present no significant hazards consideration if it was "a purely administrative change to the TS: for example, a change to achieve consistency throughout the TS, correction of an error, or a change of nomenclature."

(3) FACILITY STAFF QUALIFICATIONS - TS 6.3.1 currently requires each member of the Plant and Control & Administrative staff to meet ANSI N18.1-1971 qualifications. Amendment No. 84 reflected the new organization for the Robinson Nuclear Project. The proposed TS extends this requirement to include other Robinson Nuclear Project positions appearing on the organizational chart in Figure 6.2-2 that perform functions comparable to those delineated in ANSI N18.1-1971.

CP&L has reviewed this proposed change in accordance with the previously listed 10 CFR 50.92 significant hazards criteria and determined that it does not constitute a significant hazards consideration. The changes would not involve a significant increase in the probability or consequences of a previously evaluated accident; create the possibility of a new different kind of accident; or involve a significant reduction in a margin of safety because the amendment imposes more stringent controls by expanding the applicability of the existing qualification requirement beyond that presently included in the TS. Expanding the applicability of these requirements provides greater assurance that appropriate personnel have adequate qualifications to perform their job functions. The change does not affect the functions of any plant equipment or systems nor does it alter any parameters or procedures which govern operation of the plant. As such, there is no apparent scenario in which this change would degrade any safety margins, impair the plant's ability to respond to a safety challenge, or create an increased risk or consequence of a radioactive release.

This conclusion is further substantiated by comparing this change with the guidance provided in paragraph (ii) of the "Examples of Amendments Considered Not Likely to Involve Significant Hazards Consideration" as published in 48 FR 14864. That guidance states that the amendment would likely be found to involve no significant hazards consideration if it was "a change that constitutes an additional limitation, restriction, or control not presently included in the TS."

(4) PLANT NUCLEAR SAFETY COMMITTEE (PNSC) MEMBERSHIP - This change increases the PNSC membership by adding the Manager of Design Engineering and the Manager of Control and Administration. Specifically, this change affects the PNSC composition as specified in Section 6.5.1.6.2 of the HBR2 TS.

CP&L has reviewed this request in accordance with the standards set forth in 10 CFR 50.92 and determined that it does not constitute a significant hazard. The changes would not involve a significant increase in the probability or consequences of a previously evaluated accident; or create the possibility of a new different kind of accident; or involve a significant reduction in a margin of safety because this change is considered to be administrative in nature and serves to increase the PNSC's cognizance in these areas and provide a broader perspective of review. Therefore, this administrative change provides a more comprehensive review of safety issues and would in no way degrade any aspect of the plant's operation which could affect any of the previously stated 10 CFR 50.92 criteria.

This conclusion is further supported by comparing this change with the guidance provided by paragraph (ii) of the "Examples of Amendments Considered Not Likely to Involve Significant Hazards Consideration." That guidance states that the amendment would

likely be found to involve no significant hazards consideration if it was "a change that constitutes an additional...control not presently included in the TS."

(5) PLANT MODIFICATION APPROVAL AUTHORITY - Section 6.5.1.2.3, page 6.5-4 of the TS establishes authority for final approval modification packages. This change would further restrict the list of authorized positions by removing the "Manager - Technical Support" from that list. This is a more restrictive amendment since modification authorization must now come from either the "Manager, Robinson Nuclear Project," or "General Manager, Robinson Plant" or their designee.

CP&L has reviewed this change request and determined that it does not constitute a significant hazards consideration. The changes would not involve a significant increase in the probability or consequences of a previously evaluated accident; create the possibility of a new different kind of accident; or involve a significant reduction in a margin of safety since implementation would only serve to increase the level of control by elevating the authority to approve plant modification to that of the Manager of Robinson Nuclear Project or the General Manager of the Robinson Plant. Such action would not impair any aspect of the plant operation which could adversely affect any of the previously stated 10 CFR 50.92 criteria. Furthermore, by virtue of adding this additional administrative controls this change is comparable to example (ii) of the NRC's published guidance, "Examples of Amendments Considered Not Likely to Involve Significant Hazards Consideration."

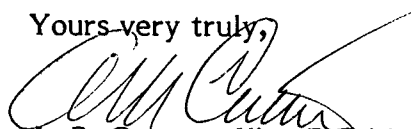
#### ADMINISTRATIVE

The affected pages are included as an enclosure for your use. Changes are denoted by a vertical bar in the right-hand margin.

In accordance with 10 CFR 170.12, a check in the amount of \$150 in payment of a license amendment application fee is attached.

If you have any questions concerning this request, please contact Mr. S. R. Zimmerman of our Nuclear Licensing Staff at (919) 836-6242.

Yours very truly,

  
A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

MDM/ccc (1518NLU)

Enclosures

cc: Dr. J. Nelson Grace (NRC-RII)  
Mr. G. Requa (NRC)  
Mr. H. Krug (NRC Resident Inspector - RNP)  
Mr. Heyward G. Shealy (SC)  
Attorney General (SC)

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein 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.

  
Notary (Seal)

My commission expires: 5-18-88

