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ACCESSION NBR: B609120048 DDC DATE: 86/09/03 NOTARIZED: YES DOCKET #
 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 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 establish dual roles of senior reactor operator & shift
 technical advisor, in response to Generic Ltr B6-04. Fee paid.

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 TITLE: Operator Requalification Program

NOTES:

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 \$150
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Carolina Power & Light Company

SEP 3 1986

SERIAL: NLS-86-299

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
DUAL-ROLE SRO/STA SHIFT COMPLEMENT

Dear Sir:

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.

Summary

Technical Specification 6.2.3 regarding the facility staff is being revised to reflect a dual role of Senior Reactor Operator (SRO) and Shift Technical Advisor (STA). If an individual holds a SRO license and also meets the STA requirements, that individual may act in both capacities. This change is based on the NRC Policy Statement on Engineering Expertise on Shift (Generic Letter 86-04) which encourages licensees to use the dual-role (SRO/STA) position.

Significant Hazards Consideration

Carolina Power & Light Company has reviewed the amendment in accordance with the standards set forth in 10 CFR 50.92 and determined that the proposed TS revision involves no significant hazards consideration. In part, this determination was based upon consideration of the guidance concerning application of this standard as provided through examples in the Federal Register on April 6, 1983 (48 FR 14864), "Examples of Amendments Considered Not Likely to Involve Significant Hazards Consideration."

Furthermore, CP&L has reviewed the requested TS change with the criteria provided in 10 CFR 50.92. Discussion of each of the three significant hazards consideration standards follows:

1. *Would the operation of the facility involve a significant increase in the probability or consequences of an accident previously evaluated?*

This request combines existing requirements and is not intended to eliminate or reduce licensee responsibilities. As stated above, it is based on an NRC policy statement which encourages use of the dual-role position. NRC requirements are not being eliminated and, therefore, there is no increase in the probability or consequences of an accident previously evaluated.

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2. *Would operation of the facility create the possibility of a new or different kind of accident from any accident previously evaluated?*

As stated above, this request combines existing NRC requirements, without eliminating any already in existence. No new accidents could result from making this change.

3. *Would operation of the facility involve a significant reduction in a margin of safety?*

Once again, operation of the facility with this change in place would not result in a significant reduction in any margin of safety. No NRC requirements are being eliminated.

Administrative

The affected page is included in Enclosure 1 for your use.

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 at (919) 836-6242.

Yours very truly,



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

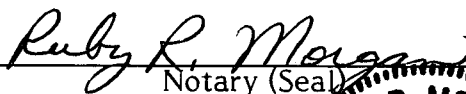
ABC/BAT/vaw (4043BAT)

Enclosure

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

My commission expires: 11/27/89



Notary (Seal)

