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SUBJECT: Application for amend to License DPR-23, deleting
 organization charts.Fee paid.

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Operations Support

SERIAL: NLS-88-077
10CFR50.90

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
DELETION OF ORGANIZATION CHARTS

Gentlemen:

SUMMARY

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, 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). The proposed change deletes the organization charts from the Technical Specifications. The NRC previously approved a similar change for the Shearon Harris Nuclear Power Plant. This request is consistent with the guidance of Generic Letter 88-06.

DISCUSSION

The content required in the Administrative Controls Section of the Technical Specifications is specified in 10CFR50.36.c(5). The regulation requires that the Technical Specifications contain the controls and provisions that are necessary to assure operation of the facility in a safe manner and does not specifically require inclusion of organizational charts in the Technical Specifications.

Previously, organization changes would have resulted in the Company's processing and the NRC's reviewing unnecessary license amendments. Consistent with the NRC and industry commitment to improve Technical Specifications, CP&L proposes to delete the organization charts from the Technical Specifications. Deletion of the organization charts is consistent with the guidance of Generic Letter 88-06.

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SIGNIFICANT HAZARDS ANALYSIS

The Commission has provided standards in 10CFR50.92(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. The Company has reviewed the proposed change and determined that:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because deletion of the organization charts from the Technical Specifications does not affect plant operation. As in the past, the NRC will continue to be informed of organizational changes through other required controls. The Code of Federal Regulations, Title 10, Part 50.34(b)(6)(i) requires that the applicant's organizational structure be included in the Final Safety Analysis Report. Chapter 13 of the Final Safety Analysis Report provides a description of the organization and detailed organization charts. As required by 10CFR50.71(e), the Company submits annual updates to the FSAR. Appendix B to 10CFR50 and 10CFR50.54(a)(3) govern changes to organization described in the Quality Assurance Program. Some of these organizational changes require prior NRC approval. Also, it is CP&L's practice to inform the NRC of organizational changes affecting the nuclear facilities prior to implementation. The Company intends to continue this practice for future organizational changes.
2. The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed change is administrative in nature, and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.
3. The proposed amendment does not involve significant reduction in a margin of safety. Through the Company's strong Quality Assurance programs and its commitment to maintain qualified personnel in positions of responsibility, it is assured that safety functions performed by the on-site and the Corporate organizations will continue to be performed with a high level of competence.

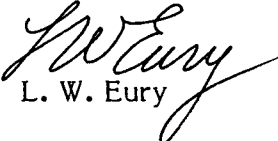
Based on the above reasoning, CP&L has determined that this proposed amendment does not involve a significant hazards consideration.

ADMINISTRATIVE INFORMATION

The proposed HBR2 Technical Specification pages are provided in Enclosure 1. The Company has evaluated this request in accordance with the provisions of 10CFR170.12 and determined that a license amendment application fee is required. A check for \$150 is enclosed in payment of this fee.

Please refer questions regarding the matter to Mr. Leonard I. Loflin at (919) 836-6242.

Yours very truly,


L. W. Eury

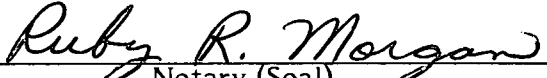
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Enclosures

cc: Dr. J. Nelson Grace
Mr. R. Lo
Mr. L. Garner (NRC - HBR)
Mr. Heyward G. Sheack (SC)
Attorney General (SC)

L. W. Eury, 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)

