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 VAUGHN, G.E. Carolina Power & Light Co. *See Report*
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 Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License DPR-23, revising Tech Spec
 Section 6.0, "Administrative Controls" to reflect changes in
 organizational structure & to correct numbering scheme for
 Spec 6.9. Description of proposed changes encl.

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Carolina Power & Light Company

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JAN 15 1991

G. E. VAUGHN
Vice President
Nuclear Services Department

SERIAL: NLS-90-200
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-NUCLEAR ASSESSMENT DEPARTMENT AND PLANT SITE
ORGANIZATIONAL AND ADMINISTRATIVE CHANGES

Gentlemen:

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 for the H. B. Robinson Steam Electric Plant, Unit No.2 (HBR2). The proposed change revises Section 6.0, "Administrative Controls," of the Technical Specifications to reflect changes in the organizational structure of CP&L, and to correct the numbering scheme for Specification 6.9.

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

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Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

In addition to the NAD changes, other changes are required to revise the Administrative Controls Section to reflect changes within the plant site organization. Several of these changes affect the composition of the Plant Nuclear Safety Committee (PNSC). One member's title has been revised to more accurately reflect the duties and the responsibilities of the position which have changed due to the restructuring which occurred during the CP&L corporate organizational analysis. A second member's title has been changed from Director to Manager, to make the title consistent with other CP&L positions with equivalent supervisory responsibility. A third member has been deleted from the PNSC because the member is no longer responsible for functions related to plant and public health and safety. A new member of the PNSC is also being added by this proposed change. Although responsibility for certain engineering design functions have been transferred to an offsite-based central design organization, this proposed change will not impact the level of engineering expertise residing in the PNSC. The current level of expertise associated with engineering support functions is retained within the combined functional positions of the existing PNSC membership.

Additionally, this change modifies the title for the top management position on site to a more generic title which is descriptive of the job responsibilities of the position and not to a specific job position title which changes with promotions of the incumbent. A correction is also being made to the numbering scheme of Specification 6.9.

Enclosure 1 provides a detailed description of the proposed NAD changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 details the basis for the Company's determination that the NAD proposed changes require no environmental assessment.

Enclosure 4 provides a detailed description of the proposed Plant site organization and administrative changes and their associated bases.

Enclosure 5 details the basis for the Company's determination that the proposed Plant site organization and administrative changes do not involve a significant hazards consideration.

Enclosure 6 details the basis for the Company's determination that the proposed Plant site organization and administrative changes require no environmental assessment.

Enclosure 7 provides the proposed Technical Specification pages for HBR2.

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

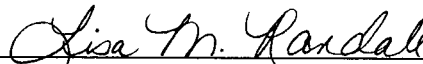
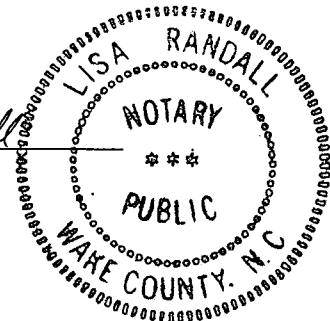
Please refer any questions regarding this submittal to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,



G. E. Vaughn

G. E. Vaughn, 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: 6-7-93

JCP/cwh (827RNP)

Enclosures:

1. Basis for Change Request - Nuclear Assessment Department
Organizational Changes
2. 10CFR50.92 Evaluation - Nuclear Assessment Department
Organizational Changes
3. Environmental Consideration - Nuclear Assessment Department
Organizational Changes
4. Basis for Change Request - Plant Site Organizational and
Administrative Changes
5. 10CFR50.92 Evaluation - Plant Site Organizational and
Administrative Changes
6. Environmental Consideration - Plant Site Organizational and
Administrative Changes
7. Technical Specification Pages

cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo

ENCLOSURE 1

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/OPERATING LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

BASIS FOR CHANGE REQUEST

Proposed Changes:

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

The proposed change modifies the following sections of the Technical Specifications as indicated:

Section 6.5:

6.5.1.1 The proposed change revises this section to require that the NAD rather than the Corporate Nuclear Safety Section (CNSS) review those procedures, tests, experiments, and changes thereto that constitute an unreviewed safety question, or involve a change to the Technical Specifications prior to implementation. The proposed change also revises this section to require that procedures, tests, and experiments which constitute a change to the FSAR shall be reviewed by the NAD rather than the CNSS.

6.5.1.2 The proposed change revises this section to require that the NAD rather than the CNSS shall approve modifications that are determined to either constitute an unreviewed safety question or a change to the Technical Specifications, prior to implementation. The proposed change also revises this section to require that modifications which constitute

a change to the facility as described in the FSAR shall also be reviewed by the NAD rather than the CNSS.

6.5.1.4 The proposed change revises this section to require that the Manager - NAD rather than the Manager - CNSS be a recipient of reports evaluating events pertaining to and providing recommendations to prevent recurrence of all violations of Technical Specifications.

6.5.1.6 The proposed change revises this section to authorize the Manager - NAD rather than the Manager - CNSS to request the Plant Nuclear Safety Committee (PNSC) to perform special reviews, investigations and prepare reports thereon. The proposed change also revises this section to require forwarding to the Manager - NAD rather than the Manager - CNSS of PNSC reports covering evaluation, recommendations, and disposition of corrective action to prevent recurrence of every unplanned on-site release of radioactive material to the environs. The proposed change revises this section to require that the Manager - NAD rather than the Manager - CNSS will be notified within 24 hours in the event of disagreement between the recommendations of the PNSC and the actions contemplated by the General Manager, and subsequent actions. The proposed change also revises this section to require submittal of written minutes of each meeting that document the results of all PNSC activities performed under the provisions of these Technical Specifications to the Manager - NAD rather than the Manager - CNSS.

6.5.2 The proposed change revises this section to specify that the NAD rather than the CNSS shall provide independent review of significant plant changes, tests, and procedures; verify that reportable events are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events, and detect trends that may not be apparent to the day-to-day observer. The proposed change revises this section to charge the Manager - NAD rather than the Manager - CNSS with the overall responsibility for administering the independent review function as described in this section. This section is revised to specify that matters involving proposed changes in procedures, the facility, or proposed tests or experiments which involve a Technical Specification change shall be referred to the Manager - NAD rather than the Manager - CNSS for independent review prior to implementation. This section is revised to specify that the Manager - NAD rather than the Manager - CNSS shall assure that independent reviews are conducted on any other matter involving safe operation of the plant which is referred to the Manager - NAD by the onsite operating organization or other CP&L functional organizational unit. The proposed change also revises this section to define the minimum experience requirements for the Manager - NAD rather than the Manager - CNSS. The proposed change revises this section to address documentation, distribution, and summation of NAD reviews, recommendations and concerns rather than those of the CNSS concerning independent reviews. This section is revised to specify that the Executive Vice President - Power Supply rather than the Senior Executive Vice President - Power Supply and Engineering &

Construction shall be a recipient of a summation of NAD rather than CNSS recommendations and concerns relating to independent reviews.

6.5.3 The proposed change revises this section to reassign to the NAD instead of the QA Services Section of the Corporate Quality Assurance Department, responsibility for performing audits of plant activities. The proposed change revises this section to charge the Manager - NAD rather than the Manager QA Services Section with overall responsibility for administering the audit program described in this section of the Technical Specifications. This section is revised to specify that the Manager - NAD rather than the Manager - CQAD shall assure that audits are conducted on any other area of facility operation that is considered appropriate by the NAD, the Executive Vice President - Power Supply (formerly the Executive Vice President - Power Supply and Engineering & Construction) or the Senior Vice President - Nuclear Generation. This section is revised to specify that results of plant audits shall be approved by the Manager - NAD rather than the Manager - QA Services Section and transmitted to the Executive Vice President - Power Supply rather than the Senior Executive Vice President - Power Supply and Engineering & Construction.

Section 6.6:

6.6.1 This section is revised to specify that the Manager - NAD rather than the Manager - CNSS shall be recipient of each reportable event reviewed in accordance with Specification 6.5.1.6.6. The proposed change revises this section to require that the Manager - NAD rather than the Manager - CNSS be a recipient of reports concerning each reportable event which requires immediate notification and/or a Licensee Event Report.

Section 6.7:

The proposed change revises this section to require that Safety Limit Reports and Safety Limit Violation Reports be submitted to the Manager - NAD rather than the Manager - CNSS.

Section 6.10:

6.10.2 The proposed change revises this section to require that records of the independent reviews performed by the NAD shall be retained for the duration of the Facility Operating License.

Basis

Creation of the NAD requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the CNSS; and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

The independent review function currently provided by the CNSS as outlined in the Technical Specifications, will not be altered by the change. Rather the proposed change will merely reflect a reporting realignment of the individuals and organizations currently providing the independent review function.

Similarly, the audit of unit activity function currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department will not be altered by the change, but will reflect a reporting realignment of the individuals and organizations currently providing the audit function. Reassignment of the audit of unit activity function to the NAD rather than the Corporate Quality Assurance Department will not impact the effectiveness of the Company's quality assurance program. The ultimate responsibility, authority, and independence to assure the effectiveness of the Company's quality assurance program will continue to reside with the Executive Vice President, Power Supply Group after implementation of the reporting realignment of the auditing function proposed by this technical specification change.

ENCLOSURE 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/OPERATING LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

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 consideration. The bases for this determination are as follows:

Proposed Change

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

Basis

The 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 because it is administrative in nature and does not physically alter any safety-related systems nor does it affect the way in which any safety-related systems perform their functions.

Section 6.0 of the Technical Specifications was revised to reflect changes in the organizational reporting structure of CP&L due to the creation of the NAD. The proposed change is administrative in nature in that the changes reflect organizational reporting changes rather than changes in the nature or depth of reviews and audits; recommendations for procedures, modifications, maintenance and operations activities; or other means of affecting unit safety. The independent review function currently provided by the CNSS as outlined in the Specifications, will not be altered by the change; rather the proposed change will merely reflect a reporting realignment of the individuals and organizations currently providing the independent review function. Similarly, the audit of unit activity function currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department will not be altered by the change; but will reflect a reporting realignment of the individuals and organizations currently providing the audit function. The other revisions to titles and organizations in the proposed change solely revise the Technical Specifications to reflect the current organizational structure of the Company.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in Item 1, the proposed change is administrative in nature and does not physically alter any safety related systems, nor does it affect the way in which any safety related systems perform their functions. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed amendment does not involve a significant reduction in the margin of safety. The proposed change is administrative in nature and does not physically alter any safety related systems nor does it affect the way in which any safety related systems perform their functions. As a result of the change, the H. B. Robinson Unit No. 2 Technical Specifications will better reflect the actual management structure at both the H. B. Robinson Steam Electric Plant, Unit No. 2 and the Corporate Office. Therefore, the proposed amendment does not involve a significant reduction in margin of safety.

ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/OPERATING LICENSE NO. DPR-23
REQUEST FOR LICENSE AMENDMENT
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES
ENVIRONMENTAL CONSIDERATION

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 effluents that may be released offsite; and (3) result in an increase in an 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. This basis for this determination follows:

Proposed Change

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

Basis

This 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 2, 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 effluents that may be released offsite.

The proposed change is purely administrative in nature and only revises Section 6 "Administrative Controls" of the Technical Specifications to reflect changes in the organizational reporting structure of CP&L due to the creation of the NAD. The proposed amendment does not introduce any new equipment nor does it require any existing equipment or systems to perform a different type of function than they are currently designed to perform. As such, the change cannot affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change is purely administrative in nature and only revises Section 6 "Administrative Controls" of the Technical Specifications to reflect changes in the organizational reporting structure of CP&L due to the creation of the NAD. No additional surveillances or testing results from the amendment. Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.

ENCLOSURE 4

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

BASIS FOR CHANGE REQUEST

Proposed Changes:

The following changes are required to revise the Administrative Controls Section 6.0 to reflect changes within the Plant site organization which have occurred since the inception of the Organizational Analysis, which was a major restructuring of Carolina Power and Light Company. Additionally, this change modifies the title for the top management position on site to a more generic title which is descriptive of the job responsibilities of the position and not to a specific job position title which changes with promotions of the incumbent. Several of the proposed changes affect the composition of the Plant Nuclear Safety Committee (PNSC). One member's title has been revised to more accurately reflect the duties and responsibilities of the position. A second member's title has been changed from Director to Manager, to make the title consistent with other CP&L positions with equivalent supervisory responsibility. A third member has been deleted from the PNSC because the member is no longer responsible for functions related to plant and public health and safety. A new member of the Plant Nuclear Safety Committee is also being added, and a correction is being made to the numbering scheme of Specification 6.9.

The proposed change modifies the Technical Specifications as indicated:

Sections 6.1 and 6.2:

The responsibility for the facility's physical security and emergency preparedness has been shifted from the Manager Control and Administration (MC&A) to the General Manager-Robinson Plant (GM). This responsibility had previously been under the cognizance of the General Manager until it was shifted to the Manager Control and Administration in 1984. Reference License Amendment 84, dated October 4, 1984. Since the MC&A is no longer responsible for these functions and document control, as explained in the following discussion, is under the authority of the GM, Specifications 6.1.2 and 6.1.3 are being deleted. The return of these activities to the GM is intended to accomplish two goals. First, moving EP and Security back under the GM will allow these functions, related to the public health and safety, to be managed by a position on site which has the responsibility for the overall safe unit operation and the control over those on site resources necessary for safe operation and maintenance of the plant. This position, as defined, is based on the guidance of Generic Letter 88-06, which provided guidance on removing organization charts from the Technical Specifications. This generic letter states that, "The Staff [NRC] finds that the only aspects of organization charts, which are important to safety, are not covered by other specifications, and must remain in Technical Specifications are those

conditions as listed below." Item (3) of this list is, "Designation of the management position in the on site organization that is responsible for the overall unit operation and has control of those on site activities necessary for safe operation and maintenance of the plant." This definition is that used by Robinson in Technical Specifications for the GM. In this aspect it can be inferred that this position is capable of managing the safety related aspects of the EP and Security organizations. The second goal is that the MC&A position is now a rotational position which will be used to provide nuclear site experience for managers in the corporate office or for those individuals who will be performing similar administrative functions. This change in management responsibility does not decrease the effectiveness of the Emergency Preparedness or Physical Security Plans.

Removal of document control from the Responsibility section of Technical Specifications is addressed by the following documents as summarized:

10 CFR 50, Appendix B, Criterion VI states, "Measures shall be established to control the issuance of documents, ----including changes thereto, which prescribes all activities affecting quality." This paragraph has no requirements regarding who manages the control function but requires the review and approval for specific documents be by authorized personnel. "Changes shall be reviewed and approved by the document's originating organization unless otherwise designated." These functions are controlled by administrative procedures at Robinson.

Procedure AP-001, "Project Organization and Responsibilities", states in Section 5.2.2.11 that the MC&A responsibilities include responsibility for developing and implementing a records management and document control system and associated procedures which meets the requirements of the NRC License mandated standards and regulations. The succession of this responsibility is also stated.

Procedure AP-004, "Procedure Control" provides instructions for management of the Plant Operating Manual and Special Procedures. This procedure designates that the MC&A recommends changes to procedure AP-001 and AP-004 which the GM is assigned the responsibility of approval. This effectively and procedurally places the approval authority for document control as a responsibility of the GM.

10 CFR 50.36(c) states that Technical Specifications will include items in the following categories: "----(5) Administrative Controls. ---- the provisions relating to organization and management ---- record keeping, review and audit-- necessary to assure operation of the facility in a safe manner."

Deletion of the Technical Specifications 6.1.2 and 6.1.3 as they relate to document control does not degrade plant safety as the responsibility for document control procedurally resides under the approval authority of the GM who is responsible for overall facility operation as is previously stated and addressed by Technical Specifications 6.1.1 and 6.2.1.c). Changes to the procedures noted above are controlled in accordance with Section 6.5, "Review and Audit" of the Technical Specifications. The document control program requirement remains the same as addressed in Section 1.8 and 17.2 of the UFSAR

which defines our commitments to Reg. Guide 1.88, "Collection Storage and Maintenance of Nuclear Power Plant Quality Assurance Records" and ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants."

Sections 6.5, 6.6 and 6.7

Several references in Section 6 refer to the Vice President-Robinson Nuclear Project. These references are being modified to the Department Head-Robinson Nuclear Project. This change will reflect a position responsibility and not a title dependent on promotions within that position. Several references in Section 6.0 refer to this position. These references are being modified to Department Head-Robinson Nuclear Project (DH-RNP). The position of Manager-RNP which is a Departmental level position within CP&L was instituted in 1983 to enhance Senior Management involvement in nuclear operations. This position's responsibility since inception has always been a Department Head, whose position title has changed dependant on whether the incumbent was a Corporate Officer or not. In an effort to reduce the administrative burden and resources expended by the NRC and CP&L to process administrative changes, this position title is being modified to Department Head as for the foreseeable future this will be a Departmental level responsibility. This more generic title will preclude the need to further change a position title following personnel promotions or changes. This is purely an administrative change associated with no changes in responsibility.

Section 6.5.1.6.2:

The changes in this section modify the titles of two PNSC members, deletes one member and adds a new member. The title changes are as follows: The title of Manager Design Engineering is revised to the Manager Outages and Modifications. This change reflects changes in responsibilities for engineering design, outages, modification liaison and modification implementation, which occurred during the Corporate Organizational Analysis changes occurring in late 1989. During the organizational analysis the responsibilities of the Manager-Design Engineering were modified. At that time his responsibilities for certain Engineering Design functions were transferred to an off site based Central Design Organization in the Corporate Office. This position was renamed the Manager of Outages and Modifications and the responsibilities of outage management, modification liaison and modification implementation were consolidated under it. This title change was made to accurately reflect the newly revised responsibilities. Since this position retained responsibility for functions impacting nuclear safety, his membership on PNSC was continued.

The second title change revises the Director QA/QC to the Manager QA/QC. This change was also made during the organizational analysis, in conjunction with other similar title changes throughout CP&L, to make consistent the title of all management with this level of supervisory responsibility. There were no changes made in the safety related aspects of this position.

Since the Manager Control and Administration is no longer responsible for the functions related to plant and public health and safety associated with

security and emergency preparedness and since the approval authority for the license required aspects of Document Control are under the authority of the GM, Tech. Spec. Items 6.1.2, 6.1.3, 6.2.2.b) referencing the MC&A and his staff may be deleted and his membership on the PNSC is no longer necessary. In this regard, his PNSC membership is being deleted.

A new member of the PNSC is being added, the Manager Plant Support. This position was added during the organizational analysis as a new management position and, as requested by the Plant General Manager, is being included as a member of PNSC. The Manager Plant Support, administratively reports to the Plant General Manager and is administratively designated as an alternate to the Plant General Manager in his absence. This new member meets the requirements of Technical Specification 6.3.1 and has previously served as a member of PNSC as the Manager of Maintenance.

Section 6.9:

The final change being made is an administrative change which renumbers and reconfigures Section 6.9 of the Administrative Controls of Technical Specifications. Over the years the numbering system has been inadvertently removed and the margins used for the affected pages have not been maintained consistently. The text of this section will remain the same, however the margins of various paragraphs and subparagraphs will be modified to reestablish the proper paragraph hierarchy and an appropriate numbering scheme will be applied to promote consistency in referencing this section of the Specs. Since no content is being changed, only an administrative change is being performed which in no way impacts plant safety.

ENCLOSURE 5

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

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 consideration. The bases for this determination are as follows:

Proposed Changes:

The proposed changes are required to revise the Administrative Controls Section 6.0 to reflect changes within the Plant site organization which have occurred since the inception of the Organizational Analysis, which was a major restructuring of Carolina Power and Light Company. Additionally, this change modifies the title for the top management position on site to a more generic title which is descriptive of the job responsibilities of the position and not to a specific job position title which changes with promotions of the incumbent. Several of the proposed changes affect the composition of the Plant Nuclear Safety Committee (PNSC). One member's title has been revised to more accurately reflect the duties and responsibilities of the position. A second member's title has been changed from Director to Manager, to make the title consistent with other CP&L positions with equivalent supervisory responsibility. A third member has been deleted from the PNSC because the member is no longer responsible for functions related to plant and public health and safety. A new member of the Plant Nuclear Safety Committee is also being added, and a correction is being made to the numbering scheme of Specification 6.9.

Basis:

The 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 because it is administrative in nature and does not physically alter any safety related systems nor does it affect the way in which any safety related systems perform their functions. In addition, the programs, whose

management has been changed or whose management title has changed, function and are controlled in the same manner as described in our approved program plans.

2. Operation of the facility with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in Item 1, the proposed change is administrative in nature and does not physically alter any safety related systems, nor does it affect the way in which any safety related systems perform their functions. In addition, the programs, whose management has been changed or whose management title has changed, function and are controlled in the same manner as described in our approved program plans. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The operation of the facility in accordance with this amendment does not involve a significant reduction in margin of safety as it is administrative in nature, does not physically alter any safety related system nor does it affect any safety related system function. The management changes addressed, do not decrease the effectiveness of the Emergency Preparedness or the Physical Security Plans. The proposed change does not impact the level of engineering expertise residing in the PNSC. The positions of Manager of Outages and Modifications and Manager of Technical Support, both of which are members of the PNSC, provide plant oversight of the engineering design functions. The current level of expertise associated with engineering support functions is retained within the combined functional positions of the existing PNSC membership. The management title changes, since they are solely title changes, do not affect the safety related aspects of their responsibilities. The Manager Plant Support is required to meet the qualification requirements of Technical Specification 6.3.1 and as such is qualified for PNSC membership. The document control functions continue to meet our commitments established in accordance with the requirements of 10 CFR 50, Appendix B, Criterion VI and associated commitments to Regulatory Guide 1.88 and ANSI N45.2.9 as addressed in the Updated Final Safety Analysis Report Sections 1.8 and 17.2. Therefore, the proposed amendment does not involve a significant reduction in margin of safety.

ENCLOSURE 6

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

ENVIRONMENTAL CONSIDERATION

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 effluents that may be released offsite; and (3) result in an increase in an 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 Changes:

The proposed changes are required to revise the Administrative Controls Section 6.0 to reflect changes within the Plant site organization which have occurred since the inception of the Organizational Analysis, which was a major restructuring of Carolina Power and Light Company. Additionally, this change modifies the title for the top management position on site to a more generic title which is descriptive of the job responsibilities of the position and not to a specific job position title which changes with promotions of the incumbent. Several of the proposed changes affect the composition of the Plant Nuclear Safety Committee (PNSC). One member's title has been revised to more accurately reflect the duties and responsibilities of the position. A second member's title has been changed from Director to Manager, to make the title consistent with other CP&L positions with equivalent supervisory responsibility. A third member has been deleted from the PNSC because the member is no longer responsible for functions related to plant and public health and safety. A new member of the Plant Nuclear Safety Committee is also being added, and a correction is being made to the numbering scheme of Specification 6.9.

Basis:

This 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 5, 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 effluents that may be released offsite.

The proposed change is purely administrative in nature and only revises Section 6 "Administrative Controls" of the Technical Specifications to reflect changes in certain site organizational responsibilities, revises position titles, adds a new PNSC member and renumbers certain specification paragraphs. The proposed amendment does not introduce any new equipment nor does it require any existing equipment or systems to perform a different type of function than they are currently designed to perform. As such the change cannot affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change is purely administrative in nature and only revises Section 6 "Administrative Controls" of the Technical Specifications to reflect changes in certain site organizational responsibilities; revise position titles; modify the titles of two PNSC members, delete one member, and add one member; and renumber certain specification paragraphs. Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.