

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
NUCLEAR ASSESSMENT DEPARTMENT FUNCTIONAL CHANGES

PROPOSED TECHNICAL SPECIFICATION PAGES

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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 or designated alternate

Member - Manager - 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

Delete → ~~Member - Manager - QA/QC or designated alternate~~

Member - Manager - Outages and Modifications or designated alternate

Member - Manager - Plant Support 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 four 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 - Nuclear Assessment Department.
- 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 reportable events.
- f) Review of facility operations to detect potential nuclear safety hazards.
- g) Review of every unplanned on site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrences to the Vice President - Robinson Nuclear Project.
~~Manager - Nuclear Assessment Department.~~
- h) Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.
- i) Review of major changes to radioactive liquid, gaseous, and solid waste treatment systems.

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 Vice President - Robinson Nuclear Project ~~and the Manager - Nuclear Assessment Department~~ 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 Vice President - Robinson Nuclear Project and to the Manager - Nuclear Assessment Department.

Replace entire section 6.5.2 with attached.

6.5.2 Nuclear Assessment Department - Independent Review

The Nuclear Assessment Department 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 a day-to-day observer. Specific review subjects are defined in Specification 6.5.2.1.d.

6.5.2.1 The Manager - Nuclear Assessment Department is charged with the overall responsibility for administering the independent review function as follows:

- a) Approves selection of the individuals to conduct safety reviews under Specification 6.5.2.
- b) Has access to plant records and operating personnel in performing independent reviews.
- c) Prepares and retains written records of reviews.
- d) Assures independent reviews are conducted on the following subjects:
 - 1) Written safety evaluations of changes in the facility as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report, and tests or experiments not described in the Safety Analysis Report that are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests, or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as

defined in 10CFR50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.

- (2) Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or an unreviewed safety question pursuant to 10CFR50.59(c). Matters of this kind shall be referred to the Nuclear Assessment Department by the Plant General Manager or by other functional organizational units within Carolina Power & Light Company prior to implementation.
- (3) Proposed changes to the Technical Specifications or this operating license, prior to implementation.
- (4) All reportable events.
- (5) Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Department, deems appropriate for consideration of which is referred to the Manager - Nuclear Assessment Department, by the on-site operating organization or by other functional organizational units within Carolina Power & Light Company.
- (6) Reports and minutes of the PNSC.

6.5.2.2 Results of Nuclear Assessment Department reviews, including recommendations and concerns, shall be documented.

- a. Copies of documented reviews shall be retained in the NAD files.

b) Recommendations and concerns shall be submitted to the Plant General Manager and Vice President - Robinson Nuclear Project within 14 days of determination.

c) A summation of Nuclear Assessment Department recommendations and concerns shall be submitted to the Chairman/President; Executive Vice President - Power Supply; Senior Vice President - Nuclear Generation; Vice President - Robinson Nuclear Project; Plant General Manager; and others, as appropriate on at least a bimonthly frequency.

d) The Nuclear Assessment Department Independent Safety Review Program shall be conducted in accordance with written, approved procedures.

6.5.2.3 Personnel

a. Personnel assigned responsibility for independent reviews shall be specified in technical disciplines and shall collectively have the experience and competence required to review problems in the following areas:

- (1) Nuclear power plant operations
- (2) Nuclear engineering
- (3) Chemistry and radiochemistry
- (4) Metallurgy
- (5) Instrumentation and control
- (6) Radiological safety
- (7) Mechanical and electrical engineering
- (8) Administration controls
- (9) Seismic and environmental
- (10) Quality assurance practices
- (11) Nondestructive Testing

b. The following minimum experience requirements shall be established for those persons involved in the independent safety review program:

- (1) Manager of NAD - Bachelor of Science in engineering or related field and ten (10) years' related experience, including five (5) years' involvement with operation and/or design of nuclear power plants.
- (2) Reviewers - Bachelor of Science in engineering or related field or equivalent and five (5) years' related experience.

c. An individual may possess competence in more than one specialty area. If sufficient expertise is not available

within the Nuclear Assessment Department, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

- d. At least three persons, qualified as discussed in Specification 6.5.2.3.b, shall review each item submitted under the requirements of Section 6.5.2.1.d.
- e. Independent safety reviews shall be performed by personnel not directly involved with the activity or responsible for the activity.

6.5.2 NAD Independent Review Program

6.5.2.1 FUNCTION

The NAD shall function to 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 a day-to-day observer.

6.5.2.2 ORGANIZATION

- 6.5.2.2.1 The individuals assigned responsibility for independent reviews shall be qualified in specific disciplines. These individuals shall collectively have the experience and competence required to review activities in the following areas:
- a) nuclear power plant operations
 - b) nuclear engineering
 - c) chemistry and radiochemistry
 - d) metallurgy
 - e) nondestructive testing
 - f) instrumentation and control
 - g) radiological safety
 - h) mechanical and electrical engineering
 - i) administrative controls
 - j) seismic and environmental
 - k) quality assurance practices
 - l) other appropriate fields
- 6.5.2.2.2 The Manager - Nuclear Safety Review Unit shall have a bachelor's degree in an engineering or related field and, in addition, shall have a minimum of 10 years' related experience, of which 5 years shall be in the operation and/or design of nuclear power plants.
- 6.5.2.2.3 The independent safety review program reviewers shall have a bachelor's degree in an engineering or related field or equivalent and, in addition, shall have a minimum of five years' related experience.
- 6.5.2.2.4 An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the NAD, competent individuals from other CP&L organizations or outside consultants shall be utilized in performing independent reviews and investigations.
- 6.5.2.2.5 The documents submitted under 6.5.2.3 shall be reviewed by individuals meeting the requirements of 6.5.2.2.1 and 6.5.2.2.3 to ensure all applicable disciplines are encompassed.
- 6.5.2.2.6 Independent safety reviews shall be performed by individuals not directly involved with the activity under review or responsible for the activity under review.
- 6.5.2.2.7 The NAD independent safety review program shall be conducted in accordance with written, approved procedures.

6.5.2.3

REVIEW

The NAD shall perform reviews of the following:

- a) Written safety evaluations of significant changes in the facility as described in the Safety Analysis Report, significant changes in procedures as described in the Safety Analysis Report, and significant tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10CFR50.59(a)(1). These reviews are to verify that such changes, tests, or experiments do not involve a change in the TSs or an unreviewed safety question as defined in 10CFR50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.
- b) Proposed changes in procedures required by these TSs, proposed changes in the facility, or proposed tests or experiments, any of which involve a change in the TSs or an unreviewed safety question pursuant to 10CFR50.59(c) prior to implementation.
- c) Proposed changes to the TSs or this Operating License prior to implementation.
- d) Violations, deviations, and reportable events, which require reporting to the NRC in writing, such as:
 - (1) violations of applicable codes, regulations, orders, TSs, license requirements, or internal procedures or instructions having safety significance;
 - (2) significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components; and
 - (3) reportable events, as specified in 10CFR, which require reporting to the NRC in writing.
- e) Any other matter involving safe operation of the nuclear power plant that the Manager - NAD deems appropriate for consideration or which is referred to the Manager - NAD by the on-site operating organization, PNSC, or by other functional organizational units within CP&L.

6.5.2.4 RECORDS

- a) Results of NAD independent safety reviews shall be documented and retained.
- b) Potential adverse conditions shall be submitted in accordance with the corrective action program.
- c) A briefing of the Nuclear Assessment Department activities, along with any potential issues and recommendations shall be presented to the Executive Vice President - Power Supply and Senior Vice President - Nuclear Generation Group on an approximately bimonthly frequency. Copies of this presentation shall be provided to the Vice President - Brunswick Nuclear Project, General Manager - Brunswick Plant, and others as appropriate.

Replace entire section 6.5.3 with attached.

~~6.5.3 Nuclear Assessment Department - Audit Program~~

~~6.5.3.1 The Nuclear Assessment 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 - Nuclear Assessment Department is charged with the overall responsibility for administering the audit program as follows:~~

- ~~a) Approves selection of the individual(s) to conduct audits.~~
- ~~b) Has access to the plant operating records and operating personnel in performing the audits.~~
- ~~c) Prepares and retains written records of audits.~~
- ~~d) Assures 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, 10CFR50, at least once per 24 months.
 - (5) The Emergency Plan and implementing procedures at least once per 12 months.
 - (6) The Security Plan and implementing procedures at least once per 12 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 Nuclear Assessment Department; the Executive Vice President - Power Supply; or the Senior Vice President - Nuclear Generation.
 - (9) The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.
 - (10) The Offsite Dose Calculation Manual and implementing procedure at least once per 24 months.
 - (11) The Process Control Program and implementing procedures for solidification of radioactive wastes at least once per 24 months.
 - (12) The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977 at least once per 12 months.
- e. Distribute reports and other records to appropriate managers.

6.5.3.3 Audit Personnel

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 - Nuclear Assessment Department and transmitted to the Executive Vice President - Power Supply; the Senior Vice President - Nuclear Generation; Vice President - Robinson Nuclear Project; Plant General Manager; and others, as appropriate within 30 days after the completion of the audit.

6.5.3.5 The Nuclear Assessment Department Audit Program shall be conducted in accordance with written, approved procedures.

6.5.3 NUCLEAR ASSESSMENT DEPARTMENT ASSESSMENT PROGRAM

The Nuclear Assessment Department is responsible for conducting independent assessments of functions/areas affecting nuclear safety, quality and reliability. This program is described in the FSAR, Section 17.3.3.3.

~~6.5.4 Outside Agency Inspection and Audit Program~~

- ~~6.5.4.1 An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite personnel or an outside fire protection firm.~~
- ~~6.5.4.2 An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.~~

This section is incorporated into section 17.3.3.3 of the FSAR.

- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of ^{independent reviews performed by the Nuclear Assessment Department} ~~quality assurance activities required by the QA program.~~
- j. Records of review performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR50.59.
- k. Records of (1) meetings of the PNSC, ~~(2) the independent reviews performed by the previous Corporate Nuclear Safety Section, and (3) the independent reviews performed by the Nuclear Assessment Department.~~
- l. Records of data results required by the radiological environmental monitoring program.