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 AUTH. NAME: AUTHOR AFFILIATION
 HOWE, P.W. Carolina Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests concurrence on interpretation of words "entire facility staff" used in Tech Specs Section 6.5. Word entire, should not be interpreted to mean all 400 individuals on facility staffs. Wording impracticable audit requirement.

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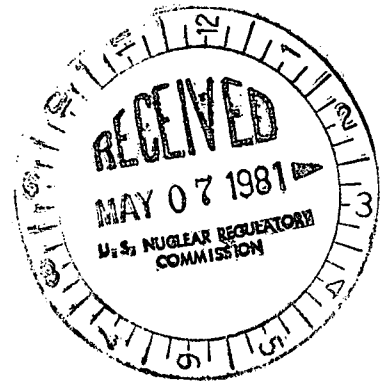
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Carolina Power & Light Company

May 5, 1981



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
QUALITY ASSURANCE PROGRAM

Dear Mr. Denton:

This letter is a request for your confirmation of concurrence with our interpretation of the wording contained in the Brunswick Units 1 and 2 and H. B. Robinson Unit 2 Technical Specifications.

The Brunswick 1 & 2 and H. B. Robinson 2 Technical Specifications, Section 6.5 state, "These audits shall encompass the training and qualification of the entire facility staff at least once per 12 months."

Carolina Power & Light Company's interpretation of the words "entire facility staff" is that this means some individuals in every job classification, included in the facility staffs, and should not be interpreted to mean all 400 individuals on the facility staffs, which would be an impracticable audit requirement.

Your confirmation of concurrence with our interpretation of this technical specification is required for our use in continuing with our audit program. Your prompt attention to this request is appreciated.

Yours very truly,

P. W. Howe
Vice President
Technical Services

PWH/t1

cc: Messrs. Walter P. Haass
D. Neighbors
J. Hannon

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