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

PERFORMANCE BASED NUCLEAR ASSESSMENT PROGRAM

TECHNICAL SPECIFICATION PAGES

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assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review. The list will include the disciplines for which each person is qualified.

6.5.1.1.5 Temporary changes to procedures, tests, or experiments may be approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator License if such change does not change the intent of the original procedure, test, or experiment. Temporary changes shall be documented and, within 21 days of receiving temporary approval, be reviewed in accordance with Specifications 6.5.1.1.2, 6.5.1.1.3, and 6.5.1.1.4 and incorporated as a permanent change or deleted.

6.5.1.1.6 Those procedures, tests, or experiments and changes thereto that constitute an unreviewed safety question, or involve a change to Technical Specifications shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such procedures, tests, or experiments and changes shall be reviewed by the Nuclear Assessment ~~Department~~ Section prior to implementation.

6.5.1.1.7 Procedures, tests, or experiments, which constitute a change to the facility as described in the UFSAR ~~FSAR~~ shall also be reviewed by the Nuclear Assessment ~~Department~~ Section. These reviews may be conducted after plant Management approval, and implementation may proceed prior to completion of review as provided for by 10 CFR 50.59(a)(1).

6.5.1.2 Modifications

6.5.1.2.1 A safety analysis shall be prepared for all modifications that affect nuclear safety. The analysis shall include a written determination of whether or not the modification is a change in the facility as described in the UFSAR ~~FSAR~~, involves a change to the Technical Specifications, or constitutes an unreviewed safety question as defined in 10 CFR 50.59(a)(2).

6.5.1.2.4 Modifications that are determined to either constitute an unreviewed safety question, as defined in 10 CFR 50.59(a)(2), or a change to the Technical Specifications, shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such modifications shall be approved by the Nuclear Assessment ~~Department~~ Section prior to implementation.

6.5.1.2.5 Modifications which constitute changes to the facility as described in the FSAR shall also be reviewed by the Nuclear Assessment ~~Department~~ Section. This review may be conducted after plant management approval, and implementation may proceed prior to completion of review.

6.5.1.3 Technical Specifications and License Changes

6.5.1.3.1 Each proposed Technical Specification or Operating License change shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval.

6.5.1.4 Review of Technical Specification Violations

6.5.1.4.1 All violations of Technical Specifications shall be investigated and a report prepared that evaluates the event and that provides recommendations to prevent recurrence. Such reports shall be reviewed by the Plant Nuclear Safety Committee and approved by the Plant General Manager or his designee and submitted to the Vice President - Robinson Nuclear ~~Project~~ Plant and to the Manager - Nuclear Assessment ~~Department~~ Section.

6.5.1.5 Nuclear Safety Review Qualification

6.5.1.5.1 Individuals shall be designated by the Vice President - Robinson Nuclear Project for the safety reviews of Specifications 6.5.1.1.2, 6.5.1.1.3, 6.5.1.2.1, and 6.5.1.2.2. These reviewers shall have a Bachelor of Science in engineering or related field or equivalent and two years related experience.

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
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.

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~~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~~ Section.

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~~ Plant, ~~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.

j) Review of changes to the CORE OPERATING LIMITS REPORT.

k) Annual review of the Fire Protection Program, including Program changes.

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6.5.1.6.2 The PNSC shall be composed of a Chairman and seven to nine members from the following functional areas:

Operations
Maintenance
Engineering
Health Physics/Chemistry
Regulatory Affairs
Nuclear Assessment

6.5.1.6.3 The PNSC Chairman, alternate Chairman, members, and alternate members shall be designated in writing by the plant General Manager. Members shall be individuals who are unit manager level or above from the site management organization. Alternate members shall, as a minimum, meet equivalent qualification criteria as specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel.

6.5.1.6.4.a The quorum of the PNSC necessary for the performance of the activities of these Technical Specifications shall consist of the Chairman (or his designated alternate) and four members (including alternates).

6.5.1.6.4.b No more than two alternates shall be counted toward meeting the quorum requirement or participate as voting members of the PNSC at any one time.

6.5.1.6.5 The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate.

6.5.1.6.7 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~~ PLANT 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~~ PLANT and to the Manager - Nuclear Assessment ~~Department~~ SECTION.

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

Replace entire Section 6.5.2 with attached

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 NAB files.

Replace Entire Section 6.5.2 with attached

b) Recommendations and concerns shall be submitted to the Plant General Manager and Vice President - Robinson Nuclear ~~Project~~ PLANT 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; 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.

Replace entire Section 6.5.2 with attached

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

Replace entire Section 6.5.2 with attached

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.

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6.5.2 Nuclear Assessment Section Independent Review Program

6.5.2.1 FUNCTION

The Nuclear Assessment Section shall function to provide independent review of plant changes, tests, and procedures. In addition, the independent review function will 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 Assessment Section shall have a bachelor's degree in an engineering or related field and, in addition, shall have a minimum of ten years' related experience, of which five years shall be in the operation and/or design of nuclear power plants.

6.5.2.2.3 The ~~Independent Safety Review Program reviewers~~ individuals performing independent safety review 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. DES 1/30/95

INSERT TO PAGES 6.5-8 THROUGH 6.5-12 (CONTINUED).

6.5.2.2.4 An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Nuclear Assessment Section, 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. Multiple reviews will be conducted on documents where required to meet applicable disciplines of 6.5.2.2.1.

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 Nuclear Assessment Section Independent Safety Review Program shall be conducted in accordance with written, approved procedures.

6.5.2.3 REVIEW

Nuclear Assessment Section shall perform reviews of the following:

a. 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 which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). These reviews are to verify that such changes, tests, or experiments do not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(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 Technical Specifications, proposed changes in the facility, or proposed tests or experiments, any of which involve a change in the Technical Specifications or an unreviewed safety question pursuant to 10 CFR 50.59(a)(2) prior to implementation.

c. Proposed changes to the Technical Specifications or this Operating License prior to implementation.

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d. Violations, deviations, and reportable events, which require reporting to the NRC in writing, such as:

1. violations of applicable codes, regulations, orders, Technical Specifications, license requirements, or internal procedures or instructions have safety significance;

2. significant operating abnormalities of deviations from normal or expected performance of plant safety-related structures, systems, or components; and

3. reportable events, as specified in 10 CFR 50.73.

e. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Section deems appropriate for consideration or which is referred to by the Manager - Nuclear Assessment Section by the on-site operating organization, PNSC, or by other functional organizational units within CP&L.

6.5.2.4 RECORDS

(a) Results of Nuclear Assessment Section independent safety reviews shall be documented and retained.

Replace entire Section with 6.5.3 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.

Replace entire section with 6.5.3 attached

(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.

Replace entire Section with 6.5.3 attached

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.

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6.5.3 Nuclear Assessment Section Assessment Program

6.5.3.1 Assessments of facility activities shall be performed by the Nuclear Assessment Section. Assessments will be performance based and will be scheduled based on plant performance and importance to safety but at a frequency not to exceed 24-months. These assessments shall encompass:

a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.

b. The performance, training and qualifications of the entire facility staff.

c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.

d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50.

e. Any other area of facility operation considered appropriate by the Vice President - Robinson Nuclear Plant.

~~f.~~ ~~The Fire Protection Program and implementing procedures.~~ DEF 1/31/95

~~g.~~ f. The Radiological Environmental Monitoring Program and the results thereof.

~~h.~~ g. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.

X h. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes.

6.5.3.2 Assessments of activities prescribed by the Code of Federal Regulations will be performed at the frequencies prescribed by the applicable regulation. These assessments shall encompass:

a. Emergency Preparedness (per 10 CFR 50.54(t))

b. Security (per 10 CFR 50.54(p))

c. Radiation Protection (per 10 CFR 20.1101)

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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.

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6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for events requiring immediate notification:

a) The NRC shall be notified pursuant to the requirements of 10 CFR 50.72.

b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Nuclear Assessment ~~Department~~ Section, and the Vice President - Robinson Nuclear ~~Project~~ Plant.

6.6.2 The following actions shall be taken for reportable events requiring a Licensee Event Report:

a) A report shall be submitted to the NRC pursuant to the requirements of 10 CFR 50.73.

b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Nuclear Assessment ~~Department~~ Section, and the Vice President - Robinson Nuclear ~~Project~~ Plant.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

a) The provisions of 10 CFR 50.72 shall be complied with.

b) The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with.

c) The safety limit violation shall be reported to the NRC Region II within one hour and the Vice President - Robinson Nuclear ~~Project and the Manager - Nuclear Assessment Department~~ PLANT within 24 hours.

d) A Safety Limit Report shall be prepared. The report shall be reviewed in accordance with Specification 6.5.1.6.6. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems, or structures; and (3) corrective action taken to prevent recurrence.

e) The Safety Limit Violation Report shall be submitted to the NRC, Vice President - Robinson Nuclear ~~Project~~ PLANT, and the Manager - Nuclear Assessment ~~Department~~ Section within 14 days of the violation.

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 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.

m. Records of Independent Reviews

assure that the reviewers collectively possess the background and qualifications in the disciplines necessary and important to the specific review. The list will include the disciplines for which each person is qualified.

6.5.1.1.5 Temporary changes to procedures, tests, or experiments may be approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator License if such change does not change the intent of the original procedure, test, or experiment. Temporary changes shall be documented and, within 21 days of receiving temporary approval, be reviewed in accordance with Specifications 6.5.1.1.2, 6.5.1.1.3, and 6.5.1.1.4 and incorporated as a permanent change or deleted.

6.5.1.1.6 Those procedures, tests, or experiments and changes thereto that constitute an unreviewed safety question, or involve a change to Technical Specifications shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such procedures, tests, or experiments and changes shall be reviewed by the Nuclear Assessment Section prior to implementation. |

6.5.1.1.7 Procedures, tests, or experiments, which constitute a change to the facility as described in the UFSAR shall also be reviewed by the Nuclear Assessment Section. These reviews may be conducted after plant Management approval, and implementation may proceed prior to completion of review as provided for by 10 CFR 50.59(a)(1). |

6.5.1.2 Modifications

6.5.1.2.1 A safety analysis shall be prepared for all modifications that affect nuclear safety. The analysis shall include a written determination of whether or not the modification is a change in the facility as described in the UFSAR, involves a change to the Technical Specifications, or constitutes an unreviewed safety question as defined in 10 CFR 50.59(a)(2). I

6.5.1.2.4 Modifications that are determined to either constitute an unreviewed safety question, as defined in 10 CFR 50.59(a)(2), or a change to the Technical Specifications, shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval prior to implementation. All such modifications shall be approved by the Nuclear Assessment Section prior to implementation.

6.5.1.2.5 Modifications which constitute changes to the facility as described in the FSAR shall also be reviewed by the Nuclear Assessment Section. This review may be conducted after plant management approval, and implementation may proceed prior to completion of review.

6.5.1.3 Technical Specifications and License Changes

6.5.1.3.1 Each proposed Technical Specification or Operating License change shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval.

6.5.1.4 Review of Technical Specification Violations

6.5.1.4.1 All violations of Technical Specifications shall be investigated and a report prepared that evaluates the event and that provides recommendations to prevent recurrence. Such reports shall be reviewed by the Plant Nuclear Safety Committee and approved by the Plant General Manager or his designee and submitted to the Vice President - Robinson Nuclear Plant and to the Manager - Nuclear Assessment Section.

6.5.1.5 Nuclear Safety Review Qualification

6.5.1.5.1 Individuals shall be designated by the Vice President - Robinson Nuclear Project for the safety reviews of Specifications 6.5.1.1.2, 6.5.1.1.3, 6.5.1.2.1, and 6.5.1.2.2. These reviewers shall have a Bachelor of Science in engineering or related field or equivalent and two years related experience.

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 a Chairman and seven to nine members. The members shall be from the following functional areas.

Operations
Maintenance
Engineering
Health Physics/Chemistry
Regulatory Affairs
Nuclear Assessment

6.5.1.6.3 The PNSC Chairman, alternate Chairmen, members, and alternate members shall be designated in writing by the plant General Manager. Members shall be individuals who are unit manager level or above from the site management organization. Alternate members shall, as a minimum, meet equivalent qualification criteria as specified in Section 4.4 of ANSI N18.1-1971 for professional-technical personnel.

6.5.1.6.4a The quorum of the PNSC necessary for the performance of the activities of these Technical Specifications shall consist of the Chairman (or his designated alternate) and four members (including alternates).

6.5.1.6.4b No more than two alternates shall be counted toward meeting the quorum requirement or participate as voting members of the PNSC at any one time.

6.5.1.6.5 The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate.

6.5.1.6.6 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 Section.

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 Plant.

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.

j) Review of changes to the CORE OPERATING LIMITS REPORT.

k) Annual review of the Fire Protection Program, including Program changes.

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 Plant 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 Plant and to the Manager - Nuclear Assessment Section.

6.5.2 Nuclear Assessment Section Independent Review Program

6.5.2.1 FUNCTION

The Nuclear Assessment Section shall function to provide independent review of plant changes, tests, and procedures. In addition, the independent review function will 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 Assessment Section shall have a bachelor's degree in an engineering or related field and, in addition, shall have a minimum of ten years' related experience, of which five years shall be in the operation and/or design of nuclear power plants.

6.5.2.2.3 The individuals performing independent safety reviews 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 Nuclear Assessment Section, 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. Multiple reviews will be conducted on documents where required to meet applicable disciplines of 6.5.2.2.1.

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 Nuclear Assessment Section Independent Safety Review Program shall be conducted in accordance with written, approved procedures.

6.5.2.3 REVIEW

Nuclear Assessment Section shall perform reviews of the following:

a. Written safety evaluations of changes in the facility as described in the UFSAR, changes in procedures as described in the UFSAR, and tests or experiments not described in the UFSAR which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). These reviews are to verify that such changes, tests, or experiments do not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(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 Technical Specifications, proposed changes in the facility, or proposed tests or experiments, any of which involve a change in the Technical Specifications or an unreviewed safety question pursuant to 10 CFR 50.59(a)(2) prior to implementation.

c. Proposed changes to the Technical Specifications 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, Technical Specifications, license requirements, or internal procedures or instructions have safety significance;

2. significant operating abnormalities of deviations from normal or expected performance of plant safety-related structures, systems, or components; and

3. reportable events, as specified in 10 CFR 50.73.

e. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Section deems appropriate for consideration or which is referred to by the Manager - Nuclear Assessment Section by the on-site operating organization, PNSC, or by other functional organizational units within CP&L.

6.5.2.4 RECORDS

(a) Results of Nuclear Assessment Section independent safety reviews shall be documented and retained.

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6.5.3 Nuclear Assessment Section Assessment Program

6.5.3.1 Assessments of facility activities shall be performed by the Nuclear Assessment Section. Assessments will be performance based 6and will be scheduled based on plant performance and importance to safety but at a frequency not to exceed 24-months. These assessments shall encompass:

a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.

b. The performance, training and qualifications of the entire facility staff.

c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.

d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50.

e. Any other area of facility operation considered appropriate by the Vice President - Robinson Nuclear Plant.

f. The Radiological Environmental Monitoring Program and the results thereof.

g. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.

h. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes.

6.5.3.2 Assessments of activities prescribed by the Code of Federal Regulations will be performed at the frequencies prescribed by the applicable regulation. These assessments shall encompass:

a. Emergency Preparedness (per 10 CFR 50.54(t))

b. Security (per 10 CFR 50.54(p))

c. Radiation Protection (per 10 CFR 20.1101)

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6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for events requiring immediate notification:

a) The NRC shall be notified pursuant to the requirements of 10 CFR 50.72.

b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Nuclear Assessment Section, and the Vice President - Robinson Nuclear Plant.

6.6.2 The following actions shall be taken for reportable events requiring a Licensee Event Report:

a) A report shall be submitted to the NRC pursuant to the requirements of 10 CFR 50.73.

b) Each reportable event shall be reviewed in accordance with Specification 6.5.1.6.6 and submitted to the Manager - Nuclear Assessment Section, and the Vice President - Robinson Nuclear Plant.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

a) The provisions of 10 CFR 50.72 shall be complied with.

b) The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with.

c) The safety limit violation shall be reported to the NRC Region II within one hour and the Vice President - Robinson Nuclear Plant within 24 hours.

d) A Safety Limit Report shall be prepared. The report shall be reviewed in accordance with Specification 6.5.1.6.6. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems, or structures; and (3) corrective action taken to prevent recurrence.

e) The Safety Limit Violation Report shall be submitted to the NRC, Vice President - Robinson Nuclear Plant, and the Manager - Nuclear Assessment Section within 14 days of the violation.

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 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 meetings of the PNSC. I

l. Records of data results required by the radiological environmental monitoring program.

m. Records of Independent Reviews. I

Form No.: NG-5024
10/90

Attachment 4
to NGGM 304-01

JUL 1991 REV 3

OUTGOING CORRESPONDENCE
FSAR CHANGE IDENTIFICATION FORM

ASSOCIATED DOCUMENT IDENTIFICATION: NL&RAS 94-119 HBRSEP/2 PERFORMANCE BASED NUCLEAR ASSESSMENT PROGRAM
(e.g., LETTER NUMBER, TITLE, DOCUMENT NUMBER)

NOTES: (1) If noted FSAR changes have already been identified and are being processed per another process or procedure (e.g., NPMP, CAP), a note to that effect is sufficient.

(2) If a complete FSAR change package is not currently available, insert the responsible person's name, anticipated completion date, and the method being utilized for tracking (e.g., FACTS#____).

(3) Refer to 10CFR50.71 and applicable nuclear project FSAR Change Control procedure(s) if in doubt of applicable change requirements.

(1) FSAR PAGE(S)/FIGURE(S) AFFECTED: UFSAR SEC 1.8 (INPUT FOR REG. GUIDE 1.146 - SEE RESPONSE TO QUESTION 1.6) & SECTION 17.3

(2) DESCRIPTION OF CHANGE (See Notes): QA PROGRAM CHANGES SEE ALSO INITIAL REQUEST OF 7/22/94 PREVIOUSLY SUBMITTED TO NRC

(AS NECESSARY FOR CLARITY, ATTACH MARKED-UP, CURRENT FSAR PAGES.)

PREPARER: [signature] DATE: 1/24/95

(3041ATTS)