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FROM: Carlina Power & Light Co. Raleigh, N.C. 27602 E.E. Utley		DATE OF DOC 2-3-75	DATE REC'D 2-7-75	LTR XX	TWX	RPT	OTHER
TO: Mr. E. Case		ORIG 3 signed	CC 37	OTHER	SENT AEC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u>		
CLASS	UNCLASS XXX	PROP INFO	INPUT XXXX	NO CYS REC'D 40	DOCKET NO: 50-261		

DESCRIPTION: Ltr notarized 2-3-75 requesting for Lic. Amdt-Revision to Tech Specs & trans the following:

ENCLOSURES: Page Changes to replace similarly numbered pages in CP&LC submittal of 12-17-74....

(40 cys encl rec'd)

PLANT NAME: H.B. Robinson Unit 2

**ACKNOWLEDGED** **Do Not Remove**

**FOR ACTION/INFORMATION**

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Carolina Power & Light Company

# Regulatory Docket File

February 3, 1975

50-261

File: NG-3514 (R)

Mr. Edson G. Case, Acting Director  
Directorate of Licensing  
Office of Regulations  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

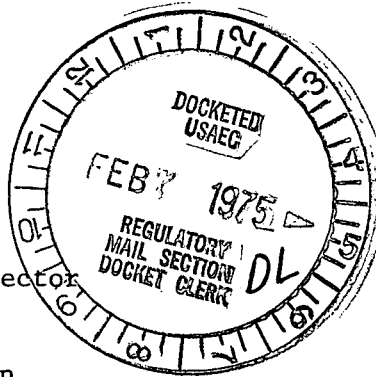
Dear Mr. Case:

H. B. ROBINSON UNIT NO. 2  
LICENSE DPR-23

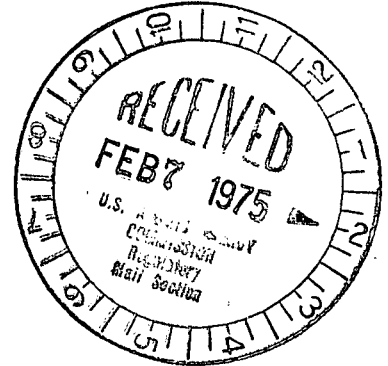
## REQUEST FOR LICENSE AMENDMENT-REVISION OF TECHNICAL SPECIFICATIONS

In accordance with the Code of Federal Regulations, Title 10, Part 50.59, Carolina Power & Light Company hereby requests a revision to the Technical Specifications for its H. B. Robinson Unit No. 2 Plant. The revision concerns the functions of the Plant Nuclear Safety and Company Nuclear Safety Committees contained in Section 6.5 of the Technical Specifications.

This requested revision is a result of additional in-house review of our submittal of December 17, 1974, which provided changes in the entire Administrative Controls Section of the Technical Specifications. Since that submittal, the Technical Specifications for our Brunswick Plant have received final approval. In order to provide uniformity of function of the Plant and Company Nuclear Safety Committees for the two plants, we desire to make the Technical Specifications applicable to these areas uniform for the two plants. The page changes attached to this letter, which are intended to replace the similarly numbered pages in our December 17 submittal, provide for the uniformity of the Technical Specifications.



Serial: NG-75-108



1441

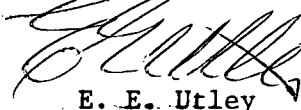
Mr. Edson G. Case

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Serial: NG-75-108  
February 3, 1975

As required by Commission Regulations, this submittal is signed under oath by a duly authorized officer of the Company.

Yours very truly,



E. E. Utley  
Vice-President  
Bulk Power Supply

DBW:cg

Attachment

cc: Messrs. N. B. Bessac  
W. E. Graham  
P. W. Howe  
J. B. McGirt  
D. B. Waters

Sworn to and subscribed before me this    th day of February, 1975.

My Commission expires: July 4, 1975

Margaret M. Cox

6.3 Facility Staff Qualifications

Approved w/ltz Dated 2-3-75

6.3.1 Each member of the facility staff shall meet or exceed the intent of ANSI N18.1-1971 with regard to the minimum qualifications for comparable positions.

6.4 Training

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Administrative Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.5 Review and Audit

Organizational units for the review and audit of plant operations shall be constituted and have the responsibilities and authorities outlined below:

6.5.1 Plant Nuclear Safety Committee (PNSC)

6.5.1.1 Purpose

As an effective means for regular review, evaluation, and maintenance of plant operational safety, a Plant Nuclear Safety Committee (PNSC) will be established during the preoperational test period prior to fuel loading of the first unit. The committee will be chaired by the Plant Manager and composed of plant supervisory personnel. The organization of this committee is shown on Figure 6.5-1.

6.5.1.2 Composition

The Plant Nuclear Safety Committee shall be composed of the following:

- (a) Chairman: Plant Manager
- (b) Vice Chairman: Operations Supervisor
- (c) Secretary: Administrative Supervisor
- (d) Engineering and Quality Assurance Supervisor

- (e) Maintenance Supervisor
- (f) Environmental and Radiation Control Supervisor

6.5.1.3 Alternates

Alternate members shall be appointed in writing by the PNSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PNSC activities as voting members at any one time.

6.5.1.4 Consultants

Consultants shall be utilized as determined by the PNSC Chairman to provide expert advice to the PNSC.

6.5.1.5 Meeting Frequency

The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman.

6.5.1.6 Quorum

A quorum of the PNSC shall consist of the Chairman or Vice Chairman plus three members including alternates.

6.5.1.7 Responsibilities

- a) Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b) Review of all proposed test and experiments that affect nuclear safety.
- c) Review of all proposed changes to the Technical Specifications.

- d) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e) Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Manager of Nuclear Generation and the Chairman of the Company Nuclear Safety Committee (CNSC).
- f) Review of facility operations to detect potential safety hazards.
- g) Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Company Nuclear Safety Committee (CNSC).
- h) Review of the Plant Security Plan and implementing procedures.
- i) Review of the Emergency Plan and implementing procedures.

6.5.1.8. Authority

- a) The Plant Nuclear Safety Committee shall be advisory.
- b) The Plant Nuclear Safety Committee shall recommend to the Plant Manager approval or disapproval of proposals under 6.5.1.7a) through d) above.

In the event of disagreement between the recommendations of the Plant Nuclear Safety Committee and the actions contemplated by the Plant Manager, the course determined by the Plant Manager to be more conservative will be followed with immediate notification to the Manager of Nuclear Generation and to the Chairman of the Company Nuclear Safety Committee.

- c) The Plant Nuclear Safety Committee shall make determinations as to whether or not proposals considered by the Committee

involve unreviewed safety questions. This determination shall be subject to review by the Company Nuclear Safety Committee as specified under 6.5.2.9.(a).

#### 6.5.1.9 Records

Minutes shall be kept at the plant of all meetings of the Plant Nuclear Safety Committee and copies shall be sent to the Manager of Nuclear Generation and to the Chairman of the Company Nuclear Safety Committee.

#### 6.5.1.10 Procedures

Written administrative procedures for committee operation shall be prepared and maintained.

#### 6.5.2 Company Nuclear Safety Committee (CNSC)

The purpose of the Carolina Power & Light Company Nuclear Safety Committee is to function as an independent technical advisory group to the senior management of Carolina Power & Light Company on all matters concerning the safe performance and operation of the Company's nuclear power plants.

##### 6.5.2.1 Technical Review Areas

The CNSC shall function to provide independent review and audit of designated activities in the areas of:

- a) Nuclear power plant operations
- b) Nuclear engineering
- c) Chemistry and Radiochemistry
- d) Metallurgy
- e) Instrumentation and control
- f) Radiological safety
- g) Mechanical and electrical engineering
- h) Quality assurance practices

#### 6.5.2.2 Composition

The Committee shall consist of at least nine persons including:

- a) Chairman
- b) Vice Chairman
- c) Secretary
- d) Four technically qualified persons who are not members of a plant staff.
- e) One member from the supervisory staff of each nuclear plant.
- f) At least one qualified noncompany affiliated technical consultant and others as required. Duly appointed consultants shall have equal vote with permanent members of the committee.

Members in a) through f) above shall be designated by the Executive Vice President - Engineering, Construction and Operation Group.

This committee, as shown on Figure 6.5-2 includes as members the Director of Technical Services as Chairman, the Manager of Nuclear Generation, the Manager of Licensing and Technological Services, the Vice President - Power Plant Engineering, the Vice President - Bulk Power Supply, the Manager of Nuclear Engineering, Manager of Fuel, the Principal Radiation Control Engineer, a member of the supervisory staff of each plant, and a non-Company member. The Director of Research serves as Vice Chairman. A Technical Services Senior Engineer serves as Secretary.

#### 6.5.2.3 Alternates

Alternate members shall be appointed in writing by the CNSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNSC activities at any one time..

#### 6.5.2.4 Qualifications

Each Company Nuclear Safety Committee member and alternate shall have at least a Bachelor's Degree in Engineering or the Physical Sciences or equivalent and a minimum of five years of professional level experience in the technical discipline represented.



6.5.2.5 Additional Qualifications

In addition of 6.5.2.4 above, at least four members and alternates shall have a minimum of three years experience in nuclear services, nuclear plant operation or nuclear engineering.

6.5.2.6 Consultants

Consultants shall be utilized as determined by the Chairman to provide expert advice to the CNSC.

6.5.2.7 Meeting Frequency

The Committee shall meet at least once each calendar quarter during the initial year of operation following the initial fuel loading; thereafter, at least twice per year.

6.5.2.8 Quorum

A quorum of the Committee consists of the Chariman or Vice Chairman plus five members present except that no more than a minority of the quorum shall be members of the plant supervisory staff.

6.5.2.9 Review

The Company Nuclear Safety Committee shall review:

- a) The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.50, 10 CFR.
- c) Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.50, 10 CFR.

- d) Proposed changes in Technical Specifications or licenses.
- e) Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g) ABNORMAL OCCURRENCES, as defined in Section 1.0 of these Technical Specifications.
- h) Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i) Reports and meeting minutes of the Plant Nuclear Safety Committee.

#### 6.5.2.10 Audits

Semi-annual audits shall be conducted in accordance with written procedures under the cognizance of the CNSC. The areas of audit shall include:

- a) Compliance with internal rules and procedures, Technical Specifications, and applicable license requirements.
- b) Implementation of operating requirements, training, and qualifications of plant operating staff.
- c) The results of corrective actions taken following abnormal occurrences.
- d) Any other area of plant operation considered appropriate by the CNSC or the Vice President - Bulk Power Supply Department.
- e) The Plant Emergency Plan and implementing procedures.

#### 6.5.2.11 Authority

The Company Nuclear Safety Committee shall function as an advisory body. The Committee shall have access to the operating record files and operating personnel to perform the audit function and may request such written or oral reports and/or analyses deemed necessary to carry out the Committee's responsibilities.

#### 6.5.2.12 Records

Records of activities shall be prepared, approved and distributed as indicated below:

- a) Minutes of each CNSC meeting shall be prepared, approved and forwarded to the Vice President - Bulk Power Supply Department with 14 days following each meeting.
- b) Reports of reviews encompassed by Section 6.5.2.9e, f, g and h above, shall be prepared, approved and forwarded to the Vice President - Bulk Power Supply Department within 14 days following completion of the review.
- c) Audit reports encompassed by Section 6.5.2.10 above, shall be forwarded to the Vice President - Bulk Power Supply Department and to the management positions responsible for the areas audited within 30 days after completion of the audit.

#### 6.5.2.13 Procedures

Written administrative procedures for committee operation shall be prepared and maintained.

### 6.6 Abnormal Occurrence Action

6.6.1 The following actions shall be taken in the event of an ABNORMAL OCCURRENCE:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. Each Abnormal Occurrence Report submitted to the Commission shall be reviewed by the PNSC and submitted to the CNSC and the Manager of Nuclear Generation.