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FROM: Carolina Power & Light Company Raleigh, N.C. 27602 E.E. Utley		DATE OF DOC: 5-17-72		DATE REC'D 6-5-72		LTR X	MEMO	RPT	OTHER
TO:		ORIG 1	CC	OTHER		SENT AEC PDR <input checked="" type="checkbox"/>			
Mr. Edward J. Bloch						SENT LOCAL PDR <input checked="" type="checkbox"/>			
CLASS: U PROP INFO		INPUT X	NO CYS REC'D 1		DOCKET NO: 50-261				

DESCRIPTION: Ltr req change to H.B. Robinson Unit No. 2 Tech Specs to more accurately describe the responsibilities & authority of the committee with regard to the operation of Unit 2w/attchmt pages 6.1-7 thru 6.1-12 of Tech Specs

PLANT NAMES:

ENCLOSURES:

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ACKNOWLEDGED**

FOR ACTION/INFORMATION DL 6-6-72				
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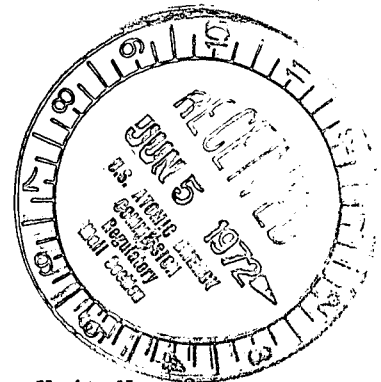
50-261

Carolina Power & Light Company

Raleigh, North Carolina 27602

May 17, 1972

Mr. Edward J. Bloch
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545



Dear Mr. Bloch:

The Company requests changes to the H. B. Robinson Unit No. 2 Technical Specifications with regard to the operation of the Company Nuclear Safety Committee. The proposed changes to Section 6.1.4.2, pages 6.1-7 through 6.1-12, are requested to more accurately describe the responsibilities and authority of the committee with regard to the operation of the H. B. Robinson Unit No. 2.

The Company Nuclear Safety Committee has been in operation for approximately two years. During this period of time, the committee has recognized several instances where the wording of the responsibilities and authority requirements of the Technical Specifications has brought about confusion and misunderstanding of the committee's functions. The proposed changes include a more appropriate delineation of the committee's responsibilities and authority based on actual operating experience. Some minor editorial revisions are also included. A copy of the revised pages (pages 6.1-7 through 6.1-12) of the Technical Specifications incorporating the requested changes regarding the Company Nuclear Safety Committee is attached to this letter.

The Company and the Company Nuclear Safety Committee have concluded that the proposed changes are consistent with the intended function of the committee and reflect only a clearer definition of the committee's responsibilities and authority.

Yours very truly,

A handwritten signature in dark ink, appearing to read "E. E. Utley".

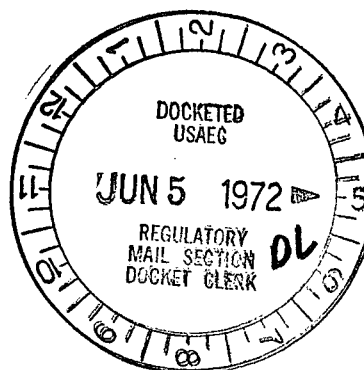
E. E. Utley
Manager

Bulk Power Supply

EEU:rea

Attachment

cc: Mr. C. D. Barham, Jr.
Mr. G. P. Beatty, Jr.
Mr. N. B. Bessac
Mr. L. E. Smith



3072

L/B

h. Records:

Received 5-17-72

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

i. Procedures:

Written administrative procedures for committee function shall be prepared and maintained describing the method of submission, and the content of presentations to the committee; provisions for the use of subcommittees; review and approval by members of written committee evaluations and recommendations; the distribution of minutes; and, such other matters as may be appropriate.

6.1.4.2 Company Nuclear Safety Committee⁽⁵⁾

a. The Committee shall consist of at least nine (9) persons:

1. Chairman
2. Vice Chairman
3. Secretary
4. Four technically qualified persons who are not members of the plant staff.
5. The Robinson Plant Superintendent.
6. At least one qualified non-company affiliated technical consultant and others as required. Duly appointed consultant members shall have equal vote with permanent members of the Committee.

7. Members shall be designated by the Senior Vice President - Engineering & Operating Group.

b. Minimum Qualifications: The qualifications of the regular members of the Company Nuclear Safety Committee with regards to education and total accumulative experience in each area of expertise shall be maintained at a level at least equal to or higher than the following: ⁽⁶⁾

1. Nuclear Power Plant Technology

Engineering graduates with at least ten (10) years senior experience in the nuclear power field in either the design or operation of power generating facilities.

2. Reactor Operations

Engineering graduates or equivalent with at least three (3) years of experience in nuclear power plant operations or engineering.

3. Utility Operations

Engineering graduates or equivalent with at least eight (8) years of experience in utility operations and/or engineering.

4. Power Plant Design

Engineering graduates or equivalent with at least eight (8) years of experience in power plant design and/or operation.

5. Reactor Engineering

Engineering graduates in nuclear engineering with additional graduate work or equivalent experience in reactor physics, or a mechanical, electrical, or chemical engineer with graduate work in nuclear engineering. In addition at least three (3) years experience is required in nuclear plant engineering or operations.

6. Radiation Safety

Graduates in Health Physics, Nuclear Engineering, or a related field with radiological safety courses or its equivalent in experience in radiation control and safety with at least three (3) years experience in radiation control and safety at a nuclear facility required.

7. Safety Analysis

Engineering graduates or equivalent with at least five (5) years experience in nuclear engineering.

- c. Meeting Frequency: Not less than once per quarter during the initial two years of operation following initial fuel loading; thereafter the Committee shall meet at least twice per year, and as required on call of the Chairman.
- d. Quorum: Chairman or Vice Chairman plus five (5) members.
- e. Responsibilities:
 - 1. Review and make recommendations concerning changes to the operating license including Technical Specifications and revised bases prior to implementing such a change.

2. Review minutes of meetings of the Plant Safety Committee to determine if matters considered by that Committee involve unreviewed or unresolved safety questions.
3. Review and make recommendations concerning matters including proposed changes or modifications to plant systems or equipment described in the Final Safety Analysis Report and having safety significance or referred to it by the Plant Safety Committee and/or by the Plant Superintendent.
4. Perform special reviews and investigations and render reports thereon as requested by the Manager - Bulk Power Supply Department.
5. Review and make recommendations concerning proposed tests and experiments and results thereof when such tests or experiments constitute an unreviewed safety question.
6. Review abnormal performance of plant equipment and anomalies which could affect nuclear safety.
7. Review abnormal occurrences and incidents which are reportable under the provisions of 10 CFR 20 and 10 CFR 50.
8. Review of occurrences if Safety Limits are exceeded.

f. Authority:

The Company Nuclear Safety Committee shall function as an advisory body. The committee shall have authority to:

1. Conduct periodic audits of plant operations.
2. Have access to the operating record files and operating personnel to perform the audit function.

3. Investigate all reported instances of violations of Technical Specifications, reporting findings and recommendations to prevent recurrence to the Manager - Bulk Power Supply Department.
4. Request such written or oral reports and/or analyses deemed necessary to carry out the committee's responsibilities.
5. Evaluate actions taken by the Plant Safety Committee specified in 6.1.4.1g2a and 6.1.4.1g3.

g. Records:

Minutes shall be recorded of all meetings of this Committee. These minutes shall serve as the official actions of the Committee. Copies of the minutes shall be forwarded to the Manager - Bulk Power Supply Department, the Senior Vice President - Engineering & Operating Group, and the President of the Company as well as the Plant Superintendent and any others that the Chairman may designate.

h. Procedures:

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

References:

- (1) FSAR Section 12.1.1
- (2) FSAR Section 12.1.2
- (3) FSAR Section 12.1.3
- (4) FSAR Section 12.5.1
- (5) FSAR Section 12.5.2
- (6) FSAR Section 12.1.3

H. B. ROBINSON UNIT NO. 2
MANAGEMENT ORGANIZATION CHART

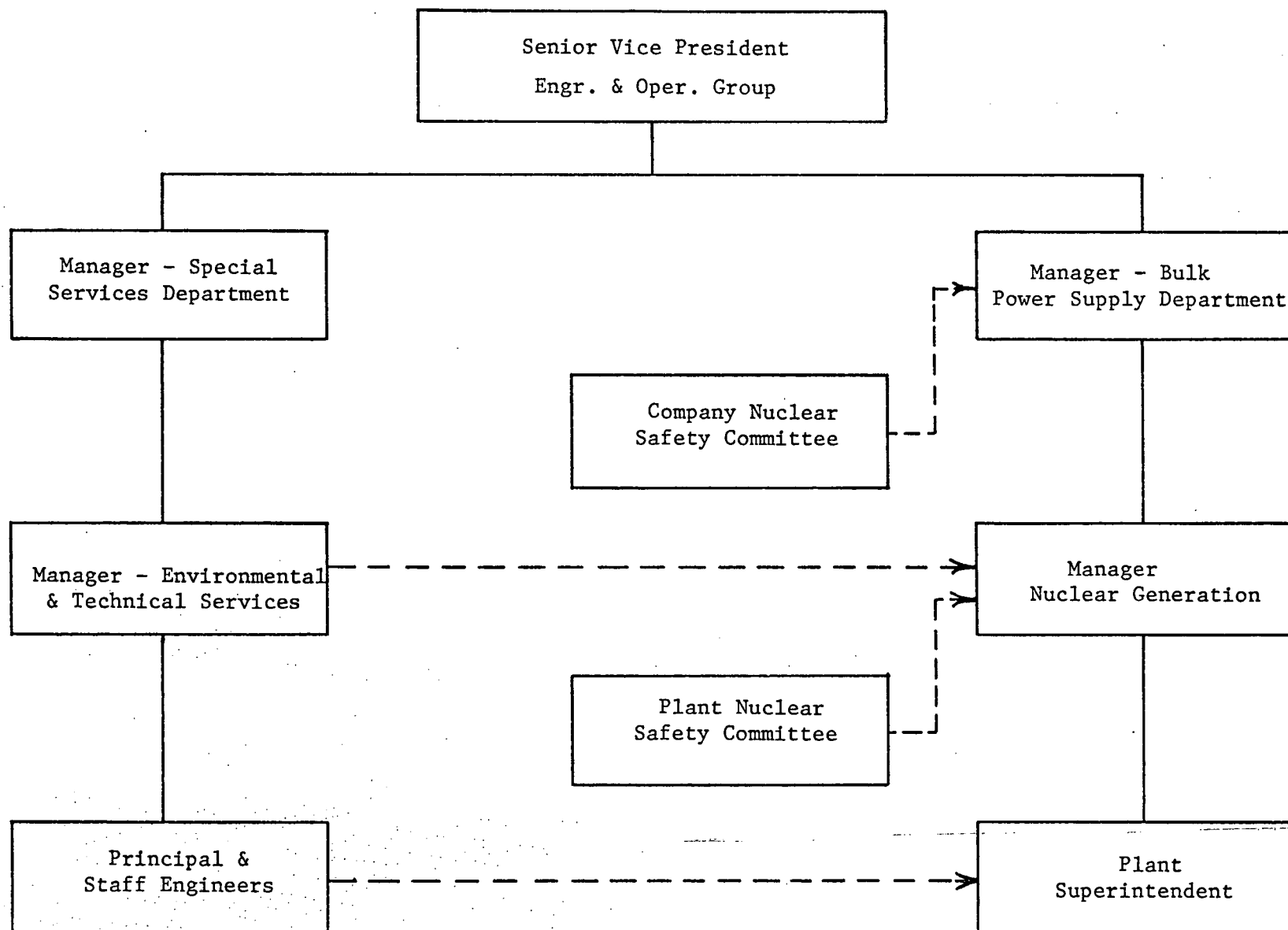


Figure 6.1-1
6.1-12