CHAPTER 13

13.0 CONDUCT OF OPERATIONS

CHAPTER 13
CONDUCT OF OPERATIONS

CHAPTER 13
CONDUCT OF OPERATIONS

LIST OF FIGURES

13.0 CONDUCT OF OPERATIONS

13.1 Organizational Structure

13.1.1 Management and Technical Support Organization

13.1.1.1 Organizational Arrangements

The corporate organization, which provides line responsibility for operation of the Company, is shown in Figure 13.1.1-1. Ultimate responsibility for operation of HBR2 rests with the Chairman, President & Chief Executive Officer.

13.1.1.1.1 Nuclear Generation

The Nuclear Generation Senior Vice President and Chief Nuclear Officer (referenced in the Technical Specifications as a corporate officer) reports, through the Executive Vice President and Chief Operating Officer of Generation & Transmission, to the Chairman, President and Chief Executive Officer. He is responsible for managing the company's nuclear plants and assuring they are in compliance with applicable regulations, codes, and other requirements. Refer to Figure 13.1.1-1 for the organizations reporting to the Senior Vice President. The organizations that have responsibilities specific to the Robinson Nuclear Plant are summarized below:

a. Nuclear Site Operations

The Senior Vice President Nuclear Operations for S.C. is responsible for the oversight of station performance and conformance to the fleet operating model for the Robinson Nuclear Plant. The Senior Vice President Nuclear Operations for S.C. reports, through the Nuclear Chief Operating Officer, to the Chief Nuclear Officer.

b. Robinson Nuclear Plant – Vice President

The Vice President, Robinson Nuclear plant, reports to the Senior Vice President Nuclear Operations and is responsible for managing all aspects of modification installation, outage management, direct plant support functions, operation, training, and maintenance of the Robinson Nuclear Plant. Additionally, the Robinson Vice President fully supports the Fleet Operating Model and is responsible for the safe, reliable, and efficient operation of the nuclear fleet. The Vice Presidents collaborate to define a clear Nuclear Generation Department strategy to support nuclear and personnel safety, production and financial excellence. The Robinson Nuclear Plant Department consists of the Plant Manager, Director Nuclear Organizational Effectiveness, Training Manager, Site Engineering General Manager, and indirect support from the Director Nuclear Plant Security.

c. The Nuclear Engineering Department

The Senior Vice President, Nuclear Engineering reports to the Senior Vice President Nuclear Corporate and is responsible for the oversight of the Nuclear Engineering organization. This organization is accountable for protecting the design basis and ensuring timely resolution to technical issues in additional to maintaining a high degree of technical precision, rigor, accuracy and completeness.

The Senior Vice President, Nuclear Engineering is responsible for effective technical direction and engineering support of the nuclear fleet. This position is also responsible for providing: nuclear fuel engineering, procurement and fabrication, component engineering, engineering program management, probabilistic safety assessment, design engineering and modification installation, configuration management, and timely resolution of the industry operating experience. Reporting to the Senior Vice President, Nuclear Engineering are: (1) General Manager, Nuclear Design Engineering, (2) General Manager, Nuclear Fuels, (3) General Manager Plant Engineering Support, and (4) General Manager of Plant Engineering. In addition, the Director Site Engineering at each nuclear site indirectly reports to the Senior Vice President, Nuclear Engineering.

d. Nuclear Oversight

The Vice President Nuclear Oversight (NOS) reports to the Nuclear Generation Executive Vice President & Chief Nuclear Officer. The Vice President Nuclear Oversight is responsible for promoting safe and efficient operation of the nuclear generating sites by providing intrusive independent oversight, with uncompromising standards, of all Nuclear Generation activities. The oversight organization provides input to the Chief Nuclear Officer, Chief Executive Officer, and Board of Directors as requested. Nuclear Oversight advises site and senior management, completes performance-based audits/assessments, promotes a safety conscious work environment of continuous improvement through use of self-evaluation, administers the nuclear Employee Concerns Program, and maintains the Approved Suppliers list through vendor qualification & surveillance. Nuclear Oversight also provides oversight of activities conducted by Nuclear Development, Nuclear Major Projects, and Project Management & Construction. Reporting to the Vice President Nuclear Oversight are the Director of Audit & Programs and the Director of Assessments & Quality Control. They are supported by the Manager of Internal Audits, and the Managers Brunswick Nuclear Oversight, Catawba Nuclear Oversight, Crystal River Nuclear Oversight, Harris Nuclear Oversight, McGuire Nuclear Oversight, Oconee Nuclear Oversight, and Robinson Nuclear Oversight.

e. Organizational Support

The General Manager Organizational Support reports to the Senior Vice President Nuclear Corporate. Organizational Support is led by a General Manager, who is responsible for providing assistance to help improve overall fleet performance. This centralized organization includes Nuclear Corporate Organizational Effectiveness; Nuclear Training; and Emergency Preparedness.

f. Operations Support

The Vice President for Operations Support reports to the Senior Vice President for Nuclear Corporate. Operations Support provides assistance to help improve operational and outage performance. This organization includes Nuclear Major Projects, Nuclear Support Services; and Nuclear Protective Services.

i. Nuclear Security

Nuclear Protective Services provides Nuclear Security Services, including Access Authorization, Fitness-For-Duty, Nuclear Security Training, and Nuclear Security Technical & Regulatory Support, Nuclear Plant Security, and the

Nuclear Security Functional Area Manager for Nuclear Generation. The RNP Security Manager is responsible for the management of the Nuclear Security Section including site Access Authorization/Fitness-For-Duty, Training & Compliance, Security Systems & Work Interaction, and Shift Operations. These organizations are led by Superintendents and Managers reporting to the Nuclear Plant Security Manager. The Nuclear Security Manager is responsible to the Vice President - Robinson Nuclear Plant for implementation of the Nuclear Security Program at the Robinson Nuclear Plant as set forth in approved security plans and security procedures, and protection of the Robinson Nuclear Plant against design basis threats. The Nuclear Security Director reports to the General Manager Nuclear Protective Services who reports to the Operations Support Vice President.

g. Nuclear Regulatory Affairs

The Director of Nuclear Regulatory Affairs reports to the Senior Vice President for Nuclear Corporate. Nuclear Regulatory Affairs has responsibility for coordinating station interfaces with regulatory agencies and for providing review of technical matters.

h. Nuclear Operations (CFAMs)

The General Manager for Nuclear Operations reports to the executive for Nuclear Corporate. Nuclear Operations includes the group of CFAMs (Corporate Functional Area Managers) that provide the structure, responsibilities, and expectations for the Nuclear Generation Department Peer Groups.

i. Nuclear Organizational and Leadership Development

The Director of Nuclear Organizational and Leadership Development reports to the executive for Nuclear Corporate. This group has responsibility for ensuring leadership development and a strategic workforce are in place.

13.1.1.2 Qualifications

The DEP corporate organization is fully qualified to support the operation of HBR2 as documented by the issuance of the Facility Operating License.

13.1.2 Operating Organization

13.1.2.1 Plant Organization

The facility organization is shown in Figure 13.1.2-1.

13.1.2.2 Plant Personnel Functions, Responsibilities, and Authorities

The Vice President - Robinson Nuclear Plant reports to the Senior Vice President Nuclear Operations for S.C. and is responsible for managing all aspects of operation and maintenance at the Robinson Nuclear Plant. These activities are conducted in a manner that will protect the health and safety of the public, will be in compliance with applicable governmental regulations, and will be within the policies and guidelines of the Company. The Vice President - Robinson Nuclear Plant is supported in these responsibilities by the Plant Manager, the Director Nuclear Organizational Effectiveness, the Training Manager, and the Engineering General Manager. In the absence of the Vice President - Robinson Nuclear Plant, these Managers may be designated "Acting Plant Vice President" for the purpose of approving documentation.

The Robinson Engineering General Manager The Site Engineering General Manager provides engineering leadership and oversight to ensure engineering related issues at the site are resolved to support safe, reliable and efficient plant operation, and to ensure engineering activities including system and component health trending and monitoring, and support of maintenance, operating, and surveillance activities are performed such that the plant design and licensing basis and configuration control are maintained. The Site Engineering General Manager reports directly to the Site Vice President and indirectly to the Senior Vice President.

1. The Plant Manager is directly responsible for the safe, reliable, and efficient operation of H. B. Robinson Unit 2 and the Independent Spent Fuel Storage Installation, including operation, maintenance, and technical supervision. This manager is responsible for adherence to all requirements in the Operating License and Technical Specifications. The Plant Manager is supported in these responsibilities by the Nuclear Operations Manager, Manager Nuclear Maintenance, Manager Nuclear Chemistry, Manager Nuclear Radiation Protection, and the Manager Nuclear Work Management. In the absence of the Plant Manager, the On-Call Management Designee will assume the Plant Manager's duties and responsibilities.

   a. The Nuclear Operations Manager - is responsible for optimizing operation of the nuclear generating unit within Technical Specifications and operating procedures to meet system load requirements during all shifts of operation. Major considerations include maximizing efficiency, reliability, availability, safety, and economic generation, while ensuring that plant operation is in compliance with NRC, other regulatory requirements associated with nuclear safety, Quality Assurance Program, and health physics, and that minimum impact on the environment is achieved. These responsibilities are accomplished through those reporting to the Nuclear Operations Manager, including the Nuclear AOM-Shift.

      Reporting to the Nuclear Operations Manager are the: Nuclear AOM-Shift, Nuclear AOM-Support, and Nuclear AOM-Training.

      The Nuclear AOM-Shift is responsible for providing coordination between the activities of the on-shift operating crews and the day-to-day activities of the Operations Unit, the operational control per administrative procedures, and provides outage support. The Nuclear AOM-Shift is supported by the Nuclear Shift Manager.

      The Nuclear Shift Manager is responsible for supervising each operating crew to ensure safe, reliable and efficient generation of power, consistent with industrial and nuclear safety measures and in strict compliance with Technical Specifications, DEP operating procedures and criteria, and with the licenses and regulations issued by the NRC. This position is designated as the Superintendent – Shift Operations (SSO) in the Technical Specifications. This position is also titled Nuclear Shift Manager in some documents. The allowance in the Technical Specifications to have less than the required minimum shift compliment for a limited period of time is not allowed to be utilized during shift changes due to an oncoming shift member being late or absent when it would result in any shift member position being unmanned.

The Senior Reactor Operators (Control Room) are accountable for administratively and technically supporting the monitoring, evaluation, and control of the instrumentation and equipment of the generating unit to ensure safe, reliable, and economic operations consistent with industrial and nuclear safety measures and in strict compliance with Technical Specifications, DEP operating procedures and criteria, and the licenses and regulations issued by the NRC. The Senior Reactor Operators directly supervise the manipulations of the reactor controls and are qualified to serve as the Control Room Supervisor.

The Licensed Operator (Work Control Center) is responsible for the proper functioning of the work management process.

The Shift Technical Advisor (STA) is responsible for providing operating experience/accident assessment technical advice and is dedicated to the safety of the plant; maintaining/broadening knowledge of normal and off-normal operations; diagnosing off-normal events; maintaining cognizance of current operating experience; ensuring capability of response to an emergency situation within ten minutes of being alerted; and, effectively carrying out assigned non-accident duties related to plant safety. This position provides continual on-shift engineering assistance as described in Technical Specifications to the Shift Manager (Superintendent - Shift Operations per Technical Specifications).

The Control Room Supervisor, also titled Control Room Shift Supervisor, is responsible for supervising the operations of the nuclear generating unit to ensure safe, reliable, and efficient generation of power consistent with industrial and nuclear safety measures and in strict compliance with Technical Specifications, DEP operating procedures and criteria, and with the licenses and regulations issued by the NRC. This position is responsible to maintain/increase knowledge and skills to retain an SRO license and to effectively provide technical and administrative supervision to the operating shift; ensure shift operations activities are in compliance with Technical Specifications, regulatory requirements, and department and Corporate policies and procedures; ensure adequate and appropriate documentation and accounting for the operation of the nuclear unit as required by the NRC and company or plant programs; maintain a competent, qualified shift operations staff and a high level of productivity and morale; contribute to cost-effective, improved plant operations and effective communications; support achievement of department, section, and unit goals through effective teamwork and working relationships; and, ensure that work is conducted with appropriate emphasis on employee safety, radiation protection, security and other programs designed to protect the welfare of employees and the public.

The Control Operator is accountable for monitoring and controlling the controls, instrumentation, and equipment required to run the generating unit in a safe, efficient, and reliable manner. The Control Operators are expected to maintain the knowledge and skill to be able to function effectively in critical situations to assure the safety of the public and the plant. The Control Operator must operate in an environment that is subject to strict NRC, procedural, safety, and other regulatory agency controls.

The Auxiliary Operator is responsible for assisting in the performance of assignments associated with shift operations and refueling, including operation of auxiliary systems and equipment outside of the control room.

b. The Manager Nuclear Chemistry is responsible for providing for the evaluation, authorization, and reporting of plant radioactive effluents in conformance with federal and state regulations and licenses. This superintendent is also responsible for chemistry control within the plant as specified in the Technical Specifications and fuel warranty, and in accordance with recommended operating practices.

c. The Manager Nuclear Radiation Protection is responsible for maintaining the health physics program by ensuring: sufficient qualified personnel to direct and implement the program; appropriate equipment and facilities; and written procedures based on acceptable radiation protection practices and guidance. The health physics program at H. B. Robinson, Unit No. 2, is developed and implemented to evaluate and document plant radiological conditions and to ensure that every reasonable effort is made to maintain occupational radiation exposure as low as reasonably achievable (ALARA). The program provides for the radiation safety of employees, plant workers, visitors, the general public, and the surrounding environment.

The Manager of the Radiation Protection Function is qualified per ANSI/ANS 3.1-1981 and is responsible for compliance with Technical Specifications as well as plant and regulatory requirements. The Manager of the Radiation Protection Function may be the Supervisor Nuclear Station Sciences, if qualified per ANSI/ANS 3.1-1981, or may be a designated Radiation Protection supervisor that is qualified per ANSI/ANS 3.1-1981.

d. The Manager Nuclear Maintenance is responsible for ensuring the plant mechanical, Instrumentation & Control (I&C), and electrical equipment/systems are economically maintained at optimum dependability, safety, and operating efficiency in a manner to ensure compliance with plant Technical Specifications, Quality Assurance Program, health physics, and other requirements. This manager is also responsible for ensuring that maintenance work is scheduled and performed per the work management process. These responsibilities are accomplished through those reporting to the Manager – Maintenance –Nuclear, including the Superintendent - Mechanical Maintenance, Superintendent - Electrical/I&C Maintenance, Superintendent Work Execution, and Superintendent – Facilities.

The Superintendent - Mechanical Maintenance is responsible for maintaining plant mechanical systems at optimum dependability, safety, and operating efficiency in a manner to ensure Technical Specifications and plant and regulatory requirements are met. These responsibilities are accomplished through those reporting to the Superintendent - Mechanical Maintenance, including the Mechanical (Shop) Supervisors.

The Superintendent - Electrical/I&C Maintenance is responsible for surveillance testing and maintenance of plant electrical and instrumentation and control systems at optimum dependability, safety, and operating efficiency to ensure compliance with Technical Specifications and plant and regulatory requirements. These responsibilities are accomplished through those reporting to the Superintendent - Electrical/I&C Maintenance, including the I&C (Shop) Supervisors.

The Superintendent Maintenance Support is responsible for the supervision of site craft personnel utilized for modification installation, outage support and other miscellaneous work of a temporary nature. This craft may include pipe fitters, welders, electricians, carpenters, sheet metal qualifications and supervision of site personnel involved with decontamination, housekeeping and facilities maintenance/renovation. The Superintendent Maintenance Support is responsible for the development of work packages for both on-line and outage work.

The Superintendent - Work Execution provides an avenue for equipment maintenance needs identified in the work management system to be planned, prepared, preparation verified and properly synchronized within the online and outage scheduling process. The Work Execution subunit includes several scope elements. These include Fix -It-Now (FIN) teams, Single Point of Contact (SPOC) teams or Shift Maintenance Support, Planning and Online and Outage Coordination. Fix -It-Now (FIN) teams are multi-discipline and are split by Mechanical and I&C/El.

e. The Manager Nuclear Work Management is responsible for the scheduling of outage and non-outage activities, and managing the work control process. This manager is also responsible for the Plant's Long Range Plan. Reporting to the Manager Nuclear Work Management are: On-Line Work Management and Nuclear Outage Manager.

2. Director Nuclear Organizational Effectiveness Organizational Effectiveness provides staff functions to the entire plant for Regulatory Affairs, Performance Improvement, Procedures, and Emergency Planning. Organizational Effectiveness is responsible for the updating of the FSAR and Technical Specifications and serves as the primary contact for the NRC. The Director Nuclear Organizational Effectiveness is supported by supervisors and staff within the following units:

a. Regulatory Affairs The Manager Nuclear Regulatory Affairs is responsible for Site Regulatory Affairs activities, including: leading the site for NRC Reactor Oversight Process (ROP) activities, such as coordinating inspection activities with the NRC, ensuring the site is appropriately prepared for and responsive to NRC inspections, tracking and managing crosscutting issues, appropriately addressing Performance Deficiencies, coordinating Significance Determination Process (SDP) activities with the NGG Probabilistic Safety Analysis (PSA) organization, and ensuring that the site effectively collects, reviews, and submits NRC ROP Performance Indicator data. Additionally, Site Regulatory Affairs serves as the primary interface between the site management team and NRC Region II, including the Resident Inspectors. Site Regulatory Affairs ensures that the company's interests are appropriately represented during these interfaces and that information shared during these interfaces is complete, accurate, and timely. The Manager Nuclear Regulatory Affairs reports to the Director Nuclear Organizational Effectiveness.

b. Performance Improvement The Manager Performance Improvement is responsible for the implementation and oversight of the PI programs to include the Corrective Action Program (CAP), Integrated Trending and Performance Assessment Program, Self Assessment (SA), Benchmark (BM), Operating Experience (OE), INPO Consolidated Date Entry (CDE) and NEI 09-07 Nuclear Safety Culture. Additionally the PI organization will oversee; track and monitor process of the INPO E&A Results. The Manager Performance Improvement reports to the Director Nuclear Organizational Effectiveness.

c. Procedures The Manager Procedures will provide direct alignment of the group to site priorities and will be part of the fleet Nuclear Procedures Group action team to participate in fleet improvement initiatives. Additionally, the Manager will provide direction and oversight of the operations, engineering, maintenance, emergency planning, chemistry, and radiation protection procedure activities as well as providing document control functions and administrative support. The Manager Procedures reports to the Director Nuclear Organizational Effectiveness.

d. Emergency Planning The Manager Emergency Planning has the following primary roles and responsibilities:

- Coordination of the site drill schedule.
- Maintains Offsite Response Organization relationships with state and local agencies.
- Conduct Station ERO notification tests and Augmentation Drills.
- Manage the Station EP budget.
- Provide support to other Station's EP personnel as necessary.
- Support EP Self-Assessments, Audits and Inspections.
- Maintain adequate documentation/files to support EP activities.
- Develop 50.54(q) evaluations for changes to station specific issues (e.g., plant assessment equipment modifications, Station Specific Annex revisions, etc.)
- Administer the Station EP CAP.
- Provide oversight of LOR DEP evaluations.
- Support other station's drill and exercise activities.
- Perform Scenario Development Team Leader activities.
- Perform Drill Evaluation Team leader responsibilities.

The Manager Emergency Planning reports to the Director Nuclear Organizational Effectiveness.

3. The Manager Nuclear Training The nuclear training department provides support for the design, development, and delivery of training for plant personnel in the accredited t raining programs. In addition, the department maintains the accredited training programs to meet industry standards and accreditation objectives. Training business unit functions included the following:

- Providing initial training for the accredited training program population,
- Providing continuing training for accredited training program population,
- Providing initial and continuing non-accredited training for some nuclear department functions,
- Ensuring accreditation renewal support activities are effectively implemented,
- Ensuring simulator maintenance and oversight,
- Maintaining an effective NRC interface for Operations initial and continuing training,
- Providing NRC initial license exam development.

The nuclear training program is implemented by the Manager Nuclear Operations Training, Supervisor Nuclear Technical Training, and the Supervisor Nuclear Maintenance Training all reporting to the Manager Nuclear Training.

13.1.3 Qualification Of Nuclear Plant Personnel

Each member of the facility staff meets or exceeds the requirements of ANSI N18.1-1971 with regard to the minimum qualifications of comparable positions, except for:

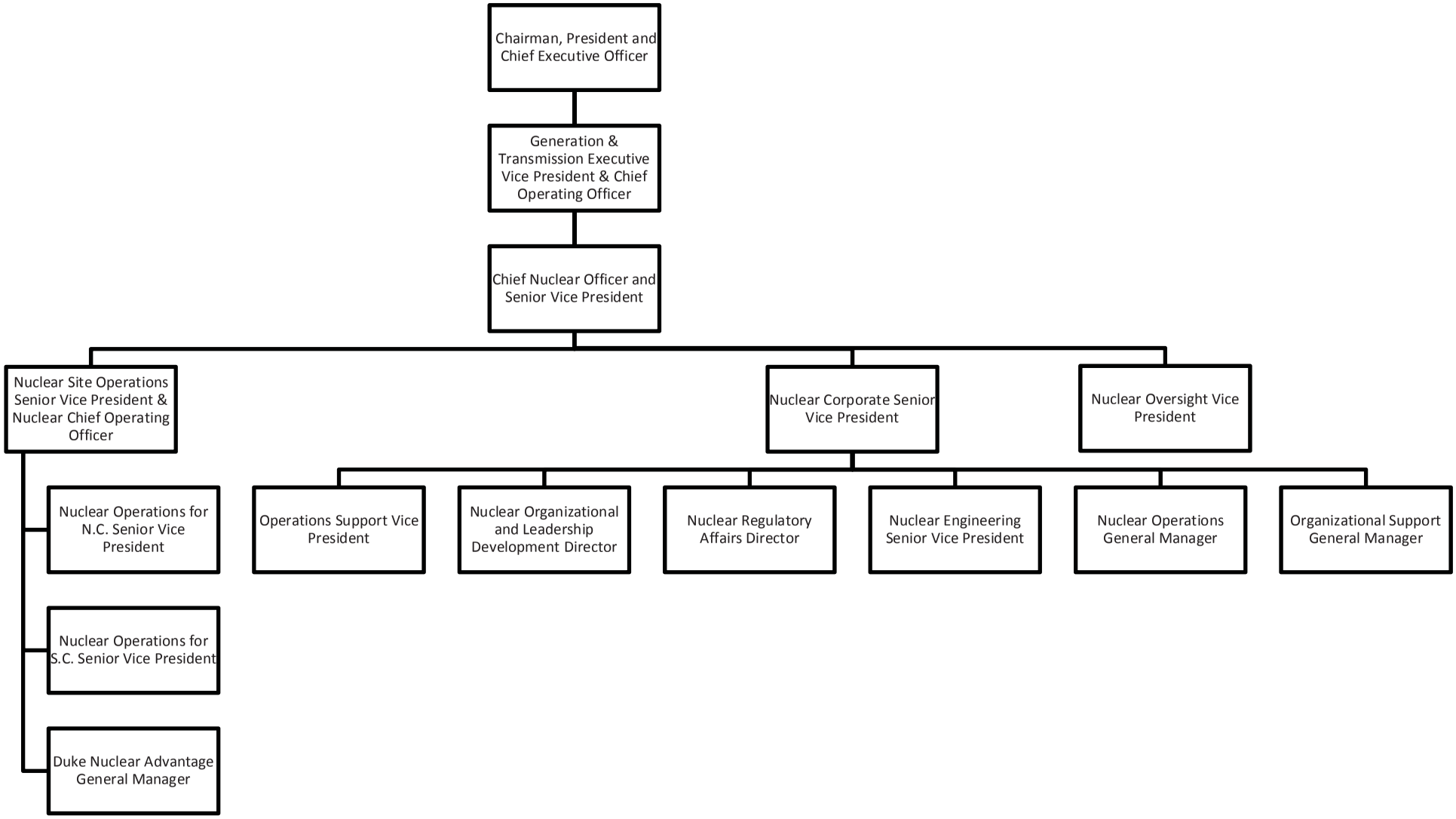
- The manager of the radiation control function who meets or exceeds the minimum qualifications of ANSI/ANS 3.1-1981

- The Shift Technical Advisors have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents

- The Operations Manager is not required to hold an SRO license if the Nuclear AOM-Shift holds an SRO license as stated in Technical Specification 5.2.2.f. Note that the Nuclear AOM-Shift is identified in Technical Specification 5.2.2.f as the “Superintendent in charge of the operations shift crews.”

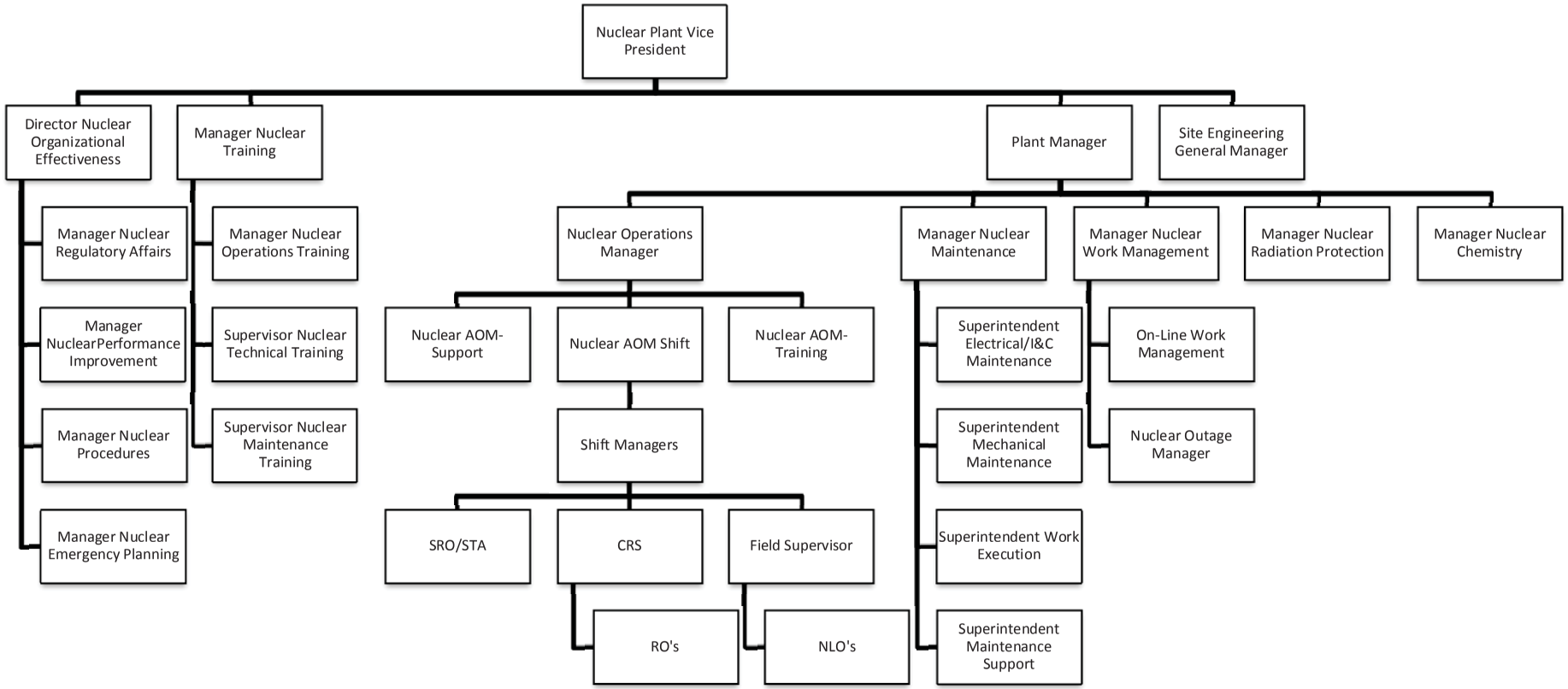
REFERENCES: SECTION 13.1

13.1.2-1 H. B. Robinson Steam Electric Plant, Unit No. 2, Technical Specifications, Appendix A to Facility Operating License No. DPR-23



REVISION NO. 27

H. B. Robinson Unit 2 Duke Energy UPDATED FINAL SAFETY ANALYSIS REPORT	DUKE ENERGY NUCLEAR GENERATION DEPARTMENT	FIGURE No. 13.1.1-1



REVISION NO. 27

H. B. Robinson Unit 2 Duke Energy UPDATED FINAL SAFETY ANALYSIS REPORT	RNP FACILITY OPERATIONS	FIGURE No. 13.1.2-1

13.2 Training

Training programs are established for retraining and replacement of the plant staff. These training programs are maintained under the direction of the Manager - Training and meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971, and 10 CFR 55.

13.2.1 Accredited Training Programs

The H. B. Robinson Steam Electric Plant, (HBRSEP) Unit No. 2 programs have been developed in accordance with the Systems Approach to Training as prescribed by the Institute of Nuclear Power Operations (INPO). The National Academy for Nuclear Training, through a formal accreditation process, verifies that HBRSEP training programs meet the established criteria. HBRSEP is a branch of the National Academy and has achieved accreditation of the following programs.

Nonlicensed Operator
Reactor Operator
Senior Reactor Operator
Continuing Training for Licensed Personnel
Shift Supervisor
Shift Technical Advisor
Instrument and Control Technician
Electrical Maintenance Personnel
Mechanical Maintenance Personnel and Supervisor
Radiological Protection Technician
Chemistry Technician
Engineering Support Personnel

The training programs are periodically evaluated and reviewed by management for effectiveness. Revisions are made as appropriate. Records are retained as necessary to support management information needs and to provide historical data.

13.2.2 General Employee and Fitness for Duty Training Programs

All persons regularly employees at HBRSEP are trained in the following areas commensurate with their job duties.

Fitness for Duty
General Plant Description
Job related Procedures and Instructions
Radiological Protection
Emergency Preparedness
Industrial Safety
Fire Protection
Security
Quality Assurance

13.2.3 Other Training Programs

Responsible managers ensure that personnel performing quality-related activities receive indoctrination and training to ensure that adequate proficiency is achieved and maintained.

13.2.4 Applicable NRC Documents

The applicable portions of the NRC regulations, Regulatory Guides (RG), American National Standards Institute (ANSI) standards, and reports listed below are used in providing requirements and associated guidance in the training of plant personnel.

1. 10CFR50.120, "Training and Qualification of Nuclear Power Plant Personnel"

2. 10CFR55, "Operators' Licenses"

3. NRC Regulatory Guide 1.149, “Nuclear Power Plant Simulation Facilities for Use in Operator Training, License Examinations, and Applicant Experience Requirements” Revision 4, April 2011

4. NUREG-0094, "NRC Operator Licensing Guide," July 1976

5. H. R. Denton's NRC letter of March 28, 1980, Subject Qualifications of Reactor Operators (see NUREG-0737)

6. ANSI N18.1 - 1971, "Personnel Selection and Training"

7. ANSI/ANS 3.1 - 1981, "Selection and Training of Nuclear Power Plant Personnel"

8. ANSI/ANS-3.5-2009, “Nuclear Power Plant Simulators for Use in Operator Training and Examination”

9. RG 1.8, Revision 2, April 1987, "Qualification and Training of Personnel for Nuclear Power Plants"

REFERENCES: SECTION 13.2

None.

13.3 Emergency Planning

The description of plans for coping with emergencies at the H. B. Robinson Steam Electric Plant is contained in the latest revision of the H. B. Robinson Steam Electric Plant Radiological Emergency Response Plan, Volume 1, Part 2 of the Plant Operating Manual (Reference 13.3-1).

Revisions to the Emergency Plan and Emergency Procedures are transmitted to NRC in accordance with 10 CFR 50.54(q). Additionally, the South Carolina Operational Radiological Emergency Response Plan and the South Carolina Technical Radiological Emergency Response Plan have been transmitted to the NRC (Reference 13.3-3).

The NRC approved the H. B. Robinson Emergency Plan on May 11, 1983 (Reference 13.3-4).

REFERENCES: Section 13.3

13.3-1 Plant Program Procedure, PLP-007, "Robinson Emergency Plan."

13.3-3 Letter from S. R. Zimmerman (CP&L) to J. P. O'Reilly (NRC) dated March 17, 1982.

13.3-4 Letter from S. A. Varga (NRC) to E. E. Utley (CP&L) dated May 11, 1983.

13.4 Review and Audit

The description of plans for conducting reviews and assessments of operating phase activities that are important to safety is contained in UFSAR Section 17.3 "RNP Quality Assurance Program Description".

13.5 PLANT PROCEDURES

The administrative and operating procedures used by the HBR plant staff to ensure that routine operating, off-normal, and emergency activities are conducted in a safe manner are described in the Controlled Procedure Manual.

Additional commitments for various plant conditions, actions, and testing that support operation of the plant are contained in the Technical Requirements Manual, which is controlled in accordance with Controlled procedures and changes must be evaluated in accordance with the 10 CFR 50.59 process.

13.6 INDUSTRIAL SECURITY

A description of the physical security program for HBR is contained in the latest revision of the H. B. Robinson Physical Security Plan, Safeguards Contingency Plan, and Guard Training and Qualification Plan.