

Response to Comments - Chapter 2 - Organization and Administration

Comment No.	Source	Comment	Disposition
2.1	NEI	Recommends that interchangeable use of “management systems and structures” and “management measures” be corrected and that the term “management policies” be used for programs and policies implemented at the corporate level	Agree. Will revise text.

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2.2	NEI	Specification of safety significant management positions in 2.3 for which qualification criteria are required should be left for specification by the license applicant. The requirement that a corporate officer be responsible for Health, Safety and the Environment (HS&E) activities is overly prescriptive.	Agree that corporate management is responsible for all facility operations, not just HS&E. SRP will be modified to reflect that the corporate officer's responsibilities do not necessarily have to be exclusively HS&E. However, NRC is interested primarily in HS&E, and wants to ensure that the applicant commits to accepting corporate responsibility for HS&E management. 70.22(a)(6) and 70.23(a)(2) require NRC staff to make findings that require staff knowledge of the applicant's training and qualification specifications for key safety management positions. The positions identified in the SRP (i.e., plant manager, operations manager, shift supervisor, and HS&E managers (or similar positions)) represent basic positions applicable to the management of the safety program. As is generally true, alternatives to the acceptance criteria can be proposed, and accordingly, the SRP text is not too prescriptive. Text will be added to acknowledge that alternative positions can be proposed by the applicant as the significant management positions.

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2.3	NEI	Proposes a rewrite of sections 2.1 to 2.7 with changes to text at various paragraphs.	Agree with most proposed revisions and will modify text to accommodate. However, SRP will continue to specify a minimum list of positions for which training and qualification requirements should be specified by applicant.