

Docket No. 50-244

MAY 31 1988

Mr. Roger W. Kober, Vice President
Electric and Steam Production
Rochester Gas & Electric Corporation
89 East Avenue
Rochester, New York 14649

Dear Mr. Kober:

SUBJECT: ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSE NO. DPR-18

The Commission has issued the enclosed Amendment No. 28 to Facility Operating License No. DPR-18 for the R. E. Ginna Nuclear Power Plant. This amendment is in response to your application dated, December 28, 1987 as clarified on May 5, 1988.

The amendment revises the Technical Specifications to remove the organizational charts and revise other administrative requirements.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

CS
Carl Stahle, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects I/II

Enclosures:

1. Amendment No. 28 to License No. DPR-18
2. Safety Evaluation

cc w/enclosures:
See next page

*See previous concurrence

OFC	:PDI-3	:PDI-3	:OGC	:PDI-3/DIR	:	:
NAME	:MRushbrook	:CStahle:ck	:	:RWesman	:	:
DATE	:4/08/88	:4/20/88	:4/26/88	:5/22/88	:	:

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OFFICIAL RECORD COPY 5/18/88

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Mr. Roger W. Kober, Vice President
Electric and Steam Production
Rochester Gas & Electric Corporation
89 East Avenue
Rochester, New York 14649

Dear Mr. Kober:

SUBJECT: ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSE NO. DRP-18

The Commission has issued the enclosed Amendment No. to Facility Operating License No. DPR-18 for the R. E. Ginna Nuclear Power Plant. This amendment is in response to your application dated, December 28, 1987.

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Sincerely,

Carl Stahle, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects I/II

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NAME	: MRushbrook	: CStahle:ck	: RWessman	: DGC	:	:
DATE	: 4/8/88	: 4/20/88	: 4/ /88	: 4/26/88	:	:

Amendment No. 28 to Facility Operating Licensee DPR-18 - R. E. Ginna
Nuclear Power Plant

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Docket File 50-244 ←

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Local PDR

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAY 31 1988

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A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script that reads "Carl Stahle".

Carl Stahle, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects I/II

Enclosures:

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Mr. Roger W. Kober
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ROCHESTER GAS AND ELECTRIC CORPORATION
DOCKET NO. 50-244
R. E. GINNA NUCLEAR POWER PLANT
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 28
License No. DPR-18

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Rochester Gas and Electric Corporation (the licensee) dated December 28, 1987 as clarified on May 5, 1988 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-18 is hereby amended to read as follows:

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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 28, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard H. Wessman, Director
Project Directorate I-3
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 31, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 28

FACILITY OPERATING LICENSE NO. DPR-18

DOCKET NO. 50-244

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

REMOVE

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- - - -
- - - -
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*No change - repositioned on page

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6.2 ORGANIZATION

6.2.1 Onsite and Offsite Organization

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all Plant management positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts. These organization charts will be documented in the UFSAR and updated in accordance with 10CFR50.71.
- b. The Senior Vice President, Production and Engineering, shall have corporate responsibility for overall Plant nuclear safety, and shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the Plant so that continued nuclear safety is assured.
- c. The Ginna Station Superintendent shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the Plant.

- d. The persons responsible for the training, health physics and quality assurance functions may report to an appropriate manager onsite, but shall have direct access to responsible corporate management at a level where action appropriate to the mitigation of training, health physics and quality assurance concerns can be accomplished.

6.2.2 Facility Staff

The Facility organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recover from reactor trips caused by transients or emergencies.
- d. All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.

- f. A Fire Brigade of 5 members shall be maintained on site at all times.* This excludes the two members of the minimum shift crew necessary for safe shutdown.
- g. Adequate shift coverage shall be maintained without routine heavy use of overtime. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions including senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel. Changes to the guidelines for the administrative procedures shall be submitted to the NRC for review.

* Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to the minimum requirements.

Table 6.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	RCS Above Cold Shutdown	Cold Shutdown & Refueling
SS	1	1
SRO	1	None
RO	2	1
AO	2	1
STA	1	None

- SS - Shift Supervisor with a Senior Reactor Operators License
- SRO - Individual with a Senior Reactor Operators License
- RO - Individual with a Reactor Operators License
- AO - Auxiliary Operator
- STA - Shift Technical Advisor

Except for the Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor from the Control Room while the unit is above Cold Shutdown, an individual (other than the Shift Technical Advisor) with a valid SRO license shall be designated to assume the Control Room command function. During any absence of the Shift Supervisor from the Control Room while the unit is in Cold Shutdown or Refueling, an individual with a valid SRO or RO license shall be designated to assume the Control Room command function.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 28 TO FACILITY OPERATING LICENSE NO. DPR-18
ROCHESTER GAS AND ELECTRIC CORPORATION
R. E. GINNA NUCLEAR POWER PLANT
DOCKET NO. 50-244

INTRODUCTION

1.0 By letter dated December 28, 1987 as clarified on May 5, 1988, Rochester Gas and Electric Corporation (RG&E or the licensee) submitted a request for changes to the R. E. Ginna Nuclear Power Plant Technical Specifications. The proposed changes request the deletion of the organization charts from the Technical Specifications.

2.0 EVALUATION

Section 6.0 of the licensee's Technical Specifications (TS) is required to contain the details of those Administrative Controls necessary to assure safe operation of the facility. The proposed revisions would replace figures 6.2-1 through 6.2-5 on the organization with more general organizational requirements. The required content of the administrative controls section of the TS is specified in 10 CFR 50.36(c)(5). The regulation, however, does not specify that organization charts be included in the plant specifications. The proposed revision establishes guidance for the management organization both onsite and offsite. The specific organization charts will be maintained in chapter 13 of the UFSAR and the Ginna Quality Assurance manual. The minimum shift crew requirements for the plant is retained in the TS. The removal of the charts will eliminate needless expenditure of resources for both organizations for processing unnecessary amendments.

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Regulatory Requirements Applicable to Organizational Structure

10 CFR 50.36, "Technical Specifications," which implements Section 182a. of the Atomic Energy Act, was promulgated by the Commission on December 17, 1968 (33 FR 18610). This rule delineates requirements for determining the contents of TS. Technical Specifications set forth the specific characteristics of the facility and the conditions for its operation that are required to provide adequate protection to the health and safety of the public. Specifically, 10 CFR 50.36 requires that:

Each license authorizing operation of a production or utilization facility of a type described in §50.21 or §50.22 will include Technical Specifications. The Technical Specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to 50.34. The Commission may include such additional TS as the Commission finds appropriate.

The regulation further states that TS will include, among other things, items in the following category:

- (5) Administrative Controls: Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. Each licensee shall submit any reports to the Commission pursuant to approved Technical Specifications as specified in §50.4.

Past Practice

Review of the organization, personnel qualifications, education, experience, training, and their overall capacity to operate a plant safely has always been of concern to the NRC, and its predecessor the AEC. Before a plant is licensed to operate, a finding is made that the applicant's staff is capable of operating the plant safely. In the past, the organization charts were made TS so that changes made after operation began would require prior NRC approval. This was done to preserve certain specific features of the licensed organization.

While the regulation does not specifically require that TS contain organization charts, the practice of including organization charts in TS began in the late 1960s. These charts were used as an aid in depicting the organizational and management relationships thought to be needed to meet the provisions of 10 CFR 50.36(c)(5). The practice of including organization charts in TS has continued since.

Organization charts do depict the reporting chain for some organizational functions that must be independent of scheduling and operating pressures. Until 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," was adopted in 1970, organization charts were partially relied on by the staff for assuring this function.

As stated in 10 CFR Part 50, Appendix B, Criterion I, "Organization":

Such persons and organizations performing quality assurance functions shall report to a management level such that this required authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations, are provided.

Appendix B further acknowledges that the organizational structures may take many forms, but emphasizes that regardless of structure, the individuals assigned the responsibility for execution of any portion of the program shall have access to such levels of management as may be necessary to perform this function. The licensee's required QA Program specifies and depicts these organizational relationships in greater detail than currently exist in TS.

The practice of including organizational charts in TS was established before the advent of 10 CFR Part 50, Appendix B, - "Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants," and other associated guidance documents, such as the Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants," and NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants LWR Edition." A general description of the features needed by the staff to make the finding that the applicant is capable of operating the plant safely are now mandated by Appendix B.

Safety Considerations

The fundamental safety issue in this license amendment request is whether there can be reasonable assurance that the organization will operate the plant safely and remain effective without requiring prior staff approval for changes reflected in organization charts.

It has been the staff's experience that organization charts by themselves have been little help to reviewers in assessing the safety significance of changes to the plant and license. Nevertheless, because the charts are in the TS, license amendment requests have been required to effect organizational changes as simple as combining some minor functions under one organizational element shown on the chart. The usefulness of the charts to the staff in recent years has been minimal and the safety relevance of the charts themselves is small.

Specific operational requirements that bear more directly on the safety matters of concern to the staff than the organization charts are required elsewhere in TS. As examples, the organizational element responsible for control room command function is identified separately in the TS, as are the requirements for minimum staffing under various operating modes. The organizational management functions for independent reviews and audits, unit review group, and shift technical advisor are also specified in other TS. Thus, the organizational charts themselves are not needed to support the staff's finding that the organization will operate the plant safely.

In summary, the specific details of the operating organization are not essential to the safe operation of the facility; and the staff concludes that the details can be modified in many ways while maintaining adequate operational safety. The staff, over the years of experience with the details of operating organizations, has been able to distill those organizational characteristics which are important to assure plant safety.

The important features of a licensee's organization (currently depicted on the TS organization charts, but not already included in other TS) necessary for the staff to find that the organization will operate the plant safely are stated below. This amendment revises the TS to incorporate the following features to replace the organizational charts:

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate in the form of organizational charts, functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions or in equivalent forms of documentation. These organizational relationships will be maintained in a document such as the FSAR or QA Manual.
- b. There shall be an individual executive position in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant so that continued nuclear safety is assured.
- c. There shall be an individual management position in the onsite organization having responsibilities for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- d. Although the individuals who train the operating staff and those who carry out the health physics and quality assurance functions may report to the appropriate manager on site, they shall have sufficient organizational freedom to take actions to a level independent from the plant operational organization.
- e. Senior Reactor Operator (SRO) and Reactor Operator (RO) licenses shall continue to be required for the positions so indicated on the previous TS organization charts.

The proposed changes incorporate these features. Therefore, the staff concludes that the removal of the organization charts from the TS will not prevent the licensees from meeting the standards of 10 CFR 50.36 and the underlying statutory requirements. Moreover, the deletion of unnecessary detail of organization charts will save resources for both the NRC and the licensees and will allow the staff to focus on issues of importance to the plant's safety.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration, which was published in the Federal Register on March 9, 1988 (53 FR 7601). The State of New York was consulted and they did not have any comments nor were there any public comments or requests for hearing.

The staff has concluded, based on the considerations discussed above, that; (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations; and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Carl Stahle

Dated: May 31, 1988