

April 28, 1988

Docket Nos. 50-280
and 50-281

DISTRIBUTION

Docket File
NRC & Local PDRs
PDII-2 R/F
SVarga
GLainas
DMiller
CPatel
OGC-WF
DHagan

EJordan
JPartlow
TBarnhart(8)
Wanda Jones
ACRS(10)
GPA/PA
ARM/LFMB
Gray File

Mr. D. S. Cruden
Vice President - Nuclear
Virginia Electric and Power Company
Post Office Box 26666
Richmond, Virginia 23261

Dear Mr. Cruden:

SUBJECT: SURRY UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE:
ORGANIZATIONAL CHANGES AND COMPLIANCE WITH GENERIC LETTER 88-06
(TAC NOS. 67588 AND 67589)

The Commission has issued the enclosed Amendment No. 119 to Facility Operating License No. DPR-32 and Amendment No. 119 to Facility Operating License No. DPR-37 for the Surry Power Station, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TS) in response to your application transmitted by letter dated March 17, 1988. The amendments are effective as of the date of issuance.

These amendments revise the Surry Unit Nos. 1 and 2 TS, Section 6, Administrative Controls, to reflect major reorganizational changes in the offsite and onsite corporate structure of Virginia Electric and Power Company. The changes (in total) are in conformance with Generic Letter 88-06 (removal of organizational charts from Technical Specifications) and also with the most current version of the Westinghouse Standard Technical Specifications which appropriately apply to Surry Power Station Unit Nos. 1 and 2.

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

Sincerely,

Original signed by

Chandu P. Patel, Project Manager
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

8805180046 880428
PDR ADDCK 05000280
P PDR

Enclosures:

1. Amendment No. 119 to DPR-32
2. Amendment No. 119 to DPR-37
3. Safety Evaluation

cc w/enclosures:
See next page

UA:PDII-2
DMiller
04/25/88

cp
PM:PDII-2
CPatel:bd
04/25/88

D:PDII-2
HBerkow
04/ /88

OGC-WF
04/ /88

Handwritten notes:
D.S. Cruden
4/28/88
OGC-WF
note

Mr. D. S. Cruden
Virginia Electric and Power Company

Surry Power Station

cc:

Mr. Michael W. Maupin
Hunton and Williams
Post Office Box 1535
Richmond, Virginia 23212

Attorney General
Supreme Court Building
101 North 8th Street
Richmond, Virginia 23219

Mr. David L. Benson, Manager
Surry Power Station
Post Office Box 315
Surry, Virginia 23883

Resident Inspector
Surry Power Station
U.S. Nuclear Regulatory Commission
Post Office Box 166, Route 1
Surry, Virginia 23883

Mr. Sherlock Holmes, Chairman
Board of Supervisors of Surry County
Surry County Courthouse
Surry, Virginia 23683

W. T. Lough
Virginia Corporation Commission
Division of Energy Regulation
Post Office Box 1197
Richmond, Virginia 23209

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30323

James B. Kenley, M.D., Commissioner
Department of Health
109 Governor Street
Richmond, Virginia 23219



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

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-280

SURRY POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 119
License No. DPR-32

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated March 17, 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 3.B of Facility Operating License No. DPR-32 is hereby amended to read as follows:

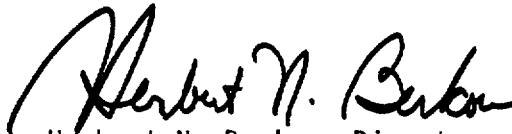
8805180054 880428
PDR ADOCK 05000280
P PDR

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 119, 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



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 28, 1988



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

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-281

SURRY POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 119
License No. DPR-37

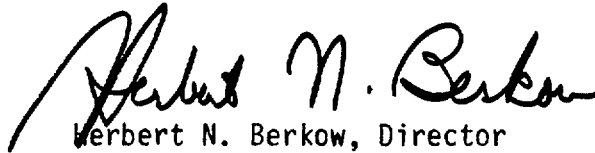
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated March 17, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's 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 3.B of Facility Operating License No. DPR-37 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 119, 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



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 28, 1988

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 119 FACILITY OPERATING LICENSE NO. DPR-32

AMENDMENT NO. 119 FACILITY OPERATING LICENSE NO. DPR-37

DOCKET NOS. 50-280 AND 50-281

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
TS 6.1-1	TS 6.1-1
TS 6.1-7	TS 6.1-7
TS 6.1-8	TS 6.1-8
TS 6.1-8a	TS 6.1-8a
TS 6.1-9	TS 6.1-9
TS 6.1-10	TS 6.1-10
TS 6.1-12	TS 6.1-12
TS 6.1-14	TS 6.1-14
TS 6.1-14a	TS 6.1-14a
TS 6.1-15	TS 6.1-15
TS Figure 6.1-1	TS Figure 6.1-1
TS Figure 6.1-2	TS Figure 6.1-2
TS 6.2-1	TS 6.2-1
TS 6.3-1	TS 6.3-1

6.0 ADMINISTRATIVE CONTROLS6.1 Organization, Safety and Operation ReviewSpecification

A. The Station Manager shall be responsible for the overall operation of the facility. In his absence, the Assistant Station Manager (Operations and Maintenance) shall be responsible for the safe operation of the facility. During the absence of both, the Station Manager will delegate in writing the succession to this responsibility.

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

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the UFSAR.
2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
3. The Vice President-Nuclear shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
4. The management position responsible for training of the operating staff and the position responsible for the quality assurance functions shall have sufficient organizational freedom including sufficient independence from cost and schedule when opposed to safety considerations.
5. The management position responsible for health physics shall have direct access to that onsite individual having responsibility for overall facility management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

B. The facility organization shall conform to the following requirements:

1. Each member of the facility staff shall meet or exceed the minimum qualifications of ANS 3.1 (12/79 Draft)* for comparable positions, and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for the Superintendent-Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

*Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, "Quality Assurance Program, Operations Phase."

- f. Responsibilities

The SNSOC shall be responsible for:

1. Review of a) all proposed normal, abnormal, and emergency operating procedures and all proposed maintenance procedures and changes thereto, b) any other proposed procedures or changes thereto as determined by the Station Manager which affect nuclear safety.
2. Review of all proposed test and experiment procedures that affect nuclear safety.
3. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
4. Review of proposed changes to Technical Specifications and shall submit recommended changes to the Station Manager.
5. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President-Nuclear and to the offsite management position responsible for independent/operational event review.
6. Review of all Reportable Events and special reports submitted to the NRC.
7. Review of facility operations to detect potential nuclear safety hazards.
8. Performance of special reviews, investigations or analyses and report thereon as requested by the Chairman of the SNSOC or Station Manager.

9. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Station Manager.
10. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Station Manager.
11. Review of every unplanned onsite release of radioactive material to the environs exceeding the limits of Specification 3.11, including the preparation or reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President-Nuclear and to the offsite management position responsible for independent/operational event review.
12. Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.

g. Authority

The SNSOC shall:

1. Provide written approval or disapproval of items considered under (1) through (3) above. SNSOC approval shall be certified in writing by an Assistant Station Manager.
2. Render determinations in writing with regard to whether or not each item considered under "(1)" through "(5)" above constitutes an unreviewed safety question.
3. Provide written notification within 24 hours to the Vice President-Nuclear and to the offsite management position responsible for independent/operational event review of disagreement between SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.A above.

h. Records

The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Vice President-Nuclear and to the offsite management position responsible for independent/operational event review.

2. Independent/Operational Event Review Group

a. Independent Review Function

The Independent/Operational Event Review Group shall function to provide independent review of designated activities in the areas of:

1. Nuclear Power Plant Operations
2. Nuclear Engineering
3. Chemistry and Radiochemistry
4. Metallurgy
5. Instrumentation and Control
6. Radiological Safety
7. Mechanical and Electrical Engineering
8. Administrative Controls and Quality Assurance Practices
9. Other appropriate fields associated with the unique characteristics of the Nuclear Power Plant

b. Composition

The Independent/Operational Event Review (IOER) staff shall be composed of the offsite management position responsible for Independent/Operational Event Review and a minimum of three individuals who qualify as staff specialists. Each Staff specialist shall have an academic degree in an engineering or physical science field and, in addition, shall have a minimum of five years technical experience in one or more areas given in Specification 6.1.C.2.a. These staff specialists shall not be directly involved in the licensing function.

c. Consultants

Consultants shall be utilized to provide expert advice to the IOER when determined to be appropriate.

d. Meeting Frequency

The IOER Staff shall meet at least once per calendar month for the purpose of fostering interaction of reviews regarding safety-related operational activities and related licensing activities.

e. Review

The following subjects shall be reviewed by IOER Staff:

1. Written safety evaluations of changes in the stations as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report, and tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests, or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2) and is accomplished by review of minutes of the Station Nuclear Safety and Operating Committee and the design change program.
2. Proposed changes in procedures, proposed changes in the station, or proposed tests or experiments, any of which may involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). Matters of this kind shall be referred to the offsite management position responsible for IOER by the Station Nuclear Safety and Operating Committee following its review prior to implementation.

6. Any other matter involving safe operation of the nuclear power stations which is referred to the offsite management position responsible for independent/operational event review.
7. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

f. Authority

The offsite management position responsible for independent/operational event review shall report through the established organization structure and advise the Vice President-Nuclear on any safety concerns discovered during the independent review of those areas of responsibility specified in Section 6.1.C.2.e.

g. Records

Records of IOER activities required by Specification 6.1.C.2.e shall be prepared and maintained in the IOER files and a summary shall be disseminated each calendar month to the Vice President-Nuclear, corporate management position responsible for the quality assurance audit program, and other appropriate management personnel.

6. The Station Security Plan and implementing procedures at least once per 12 months.
7. Any other area of facility operation considered appropriate by the corporate management position responsible for the quality assurance audit program or the Vice President-Nuclear.
8. The Station Fire Protection Program and implementing procedures at least once per 24 months.
9. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
10. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.
11. The radiological environmental monitoring program at least once per 12 months.
12. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.

13. The Process Control Program and implementing procedures for processing and packaging of radioactive waste at least once per 24 months.

b. Authority

The Quality Assurance Department shall advise the Vice President-Nuclear on those areas of responsibility specified in 6.1.C.3.a above.

c. Records

Records of the Quality Assurance Department audits shall be prepared and maintained in the company files. Audit reports shall be disseminated to the Vice President-Nuclear and the management position responsible for the areas audited.

DELETED

DELETED

6.2 GENERAL NOTIFICATION AND REPORTING REQUIREMENTS

Specification

- A. The following actions shall be taken for Reportable Events:
1. A report shall be submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
 2. Each Reportable Event shall be reviewed by the SNSOC. The offsite management position responsible for independent/operational event review and the Vice President-Nuclear shall be notified of the results of this review.
- B. Immediate notifications shall be made in accordance with Section 50.72 to 10 CFR Part 50.

6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED**Specification**

- A. The following actions shall be taken in the event a Safety Limit is violated:
1. The facility shall be placed in at least hot shutdown within 1 hour.
 2. The Safety Limit violation shall be reported to the Commission, the Vice President-Nuclear, and the offsite management position responsible for independent/operational event review within 24 hours.
 3. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSOC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
 4. The Safety Limit Violation Report shall be submitted to the Commission, the offsite management position responsible for independent/operational event review and the Vice President-Nuclear within 14 days of the violation.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 119 TO FACILITY OPERATING LICENSE NO. DPR-32
AND AMENDMENT NO. 119 TO FACILITY OPERATING LICENSE NO. DPR-37
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-280 AND 50-281

INTRODUCTION

By letter dated March 17, 1988, the Virginia Electric and Power Company (the licensee) proposed changes to the Technical Specifications (TS), Section 6, Administrative Controls, for the Surry Power Station, Units No. 1 and No. 2 (SPS-1&2). The proposed changes were necessitated by a major reorganization of the licensee announced on March 8, 1988, to become effective in April 1988. Specifically, nuclear operations will be strengthened by bringing the Engineering and Power Operations Departments within a single organization headed by a Senior Vice President. Nuclear Site Services and Nuclear Training will be included in the Nuclear Operations Department. A single group will be created within the Engineering Department responsible for nuclear transient and fuel analysis. Also, within the Engineering Department, Inservice Inspection and Non-Destructive Examination services will be combined under a single manager. In addition, the number of system engineers assigned to SPS-1&2 will be increased.

The proposed changes provided in the licensee's submittal of March 17, 1988 would remove TS Figure 6.1-1, Offsite Organization for Facility Management and Technical Support, and TS Figure 6.1-2, Surry Power Station Organization charts, and replace the figures with a narrative description of the offsite and onsite organizations functional requirements in TS 6.1. Additionally, the licensee would replace certain corporate level position titles with more general position descriptions and revise certain administrative requirements in order to bring them into closer conformance with the corresponding requirements in the currently acceptable Standard TS for Westinghouse plants.

After the licensee's submittal of March 17, 1988, NRC Generic Letter 88-06 was issued on March 22, 1988 which addressed the removal of organization charts from TS administrative control requirements. Since the licensee did not have the specific guidance of Generic Letter 88-06 prior to their submittal on March 17, 1988, the staff and the licensee discussed these matters in order to achieve conformance between their submittal and the provisions of Generic Letter 88-06. Our discussion and evaluation of these matters is provided below.

8805180061 880428
PDR ADOCK 05000280
P PDR

DISCUSSION

Consistent with the guidance provided in the Standard TS, Specification 6.1 of the administrative controls has referenced offsite and onsite (unit) organization charts that are provided as figures to this section. On a plant-specific basis, these organization charts have been provided by applicants and included in the TS issued with the operating license. Subsequent restructuring of either the offsite or onsite (unit) organizations, following the issuance of an operating license, has required licensees to submit a license amendment for NRC approval to reflect the desired changes in these organizations. As a consequence, organizational changes have necessitated the need to request an amendment of the operating license.

Because of these limitations on organizational structure, the nuclear industry has highlighted this as an area for improvement in the TS. In its review of these matters, the staff concluded that most of the essential elements of offsite and onsite organization charts are captured by other regulatory requirements, notably, Appendix B to 10 CFR 50. However, there were aspects of the organizational structure that are important to ensure that the administrative control requirements of 10 CFR 50.36 would be met and that would not be retained with the removal of the organization charts. The applicable regulatory requirements are those administrative controls that are necessary to ensure safe operation of the facility. Therefore, those aspects of organization charts that were essential for conformance with regulatory requirements were specified in Generic Letter 88-06, TS 6.2.1.

The licensee's changes to the SPS-1&2 TS are in accordance with the guidance provided in Generic Letter 88-06. Additionally, in certain cases, the licensee's changes are more restrictive than Generic Letter 88-06. Finally, certain requirements in Section 6 of the TS are being revised to bring the SPS-1&2 TS more closely in conformance with the currently acceptable Standard TS for Westinghouse plants. The changes are addressed in detail below.

- (1) Specifications 6.1 would be revised to delete the references to TS Figure 6.1-1 and TS Figure 6.1-2 which would be removed from the SPS-1&2 TS.
- (2) Functional requirements of the offsite and onsite organization would be defined and added to the SPS-1&2 TS 6.1 as Items 1., 2. and 3., as specified in Generic Letter 88-06. For Item d. of Generic Letter 88-06, the licensee would provide a more restrictive definition as specified in the licensee's proposed Items 4. and 5. The proposed SPS-1&2 TS notes that implementation of the requirements would be documented in the SPS-1&2 Updated Final Safety Analysis Report (UFSAR).
- (3) The senior reactor operator and reactor operator license qualified positions, identified on the SPS-1&2 organization charts for the onsite staff, are noted as being required in the SPS-1&2 TS 6.1.B and Table 6.1-1. Therefore, this requirement will be retained as a requirement following removal of the organization charts from the SPS-1&2 TS.

- (4) Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee has confirmed that this documentation will be addressed in the next annual update of the SPS-1&2 Updated Final Safety Analysis Report chapter entitled "Conduct of Operations," which contains the detailed organizational structure and description of the conduct of operations. This information is also required by 10 CFR 50.71(e) to be maintained and updated annually.
- (5) The licensee has confirmed that no specifications, other than those noted in Item (1) above, include references to the figures of the organization charts that are being removed from TS for its plant. Hence, this is not an applicable consideration, with regard to the need to redefine referenced requirements as a result of the removal of these figures.
- (6) The licensee has replaced certain corporate level position titles except those required by Generic Letter 88-06 (the Vice President-Nuclear and Station Manager) with more general position descriptions. These general position descriptions are: (a) offsite management position responsible for independent/operational event review; (b) corporate management position responsible for the quality assurance audit program; and (c) the departmental name "Safety Evaluation and Control (SEC)" has been replaced by "Independent/Operational Event Review Group." These changes are consistent with the general guidelines for Generic Letter 88-06. In the March 17, 1988 application, the licensee initially proposed to identify the management officers by general terminology. However, after discussions with the NRC staff, the licensee modified the request to identify the Senior Vice President-Nuclear and the Station Manager by their titles in accordance with the recommendations of GL 88-06. This change merely adds clarity to the more general terminology used in the March 17, 1988 request and does not affect the substance of the amendments as noticed nor the staff's proposed no significant hazards consideration determination.
- (7) TS 6.1.C.2.f, 6.1.C.2.g and 6.1.C.3.c requirements have been revised to conform more closely with the corresponding requirements in the most current version of the Standard TS for Westinghouse plants. Accordingly, the intent of the original requirement remains unchanged. The following is a summary of these changes.

- a. TS 6.1.C.2.f "Authority" for the Independent/Operational Event Review Group.

The existing requirement specifies the chain of command as well as the authority responsibilities by stating that the Director-Safety Evaluation and Control shall report to and advise the Manager-Nuclear Programs and Licensing, who shall advise the Vice President-Nuclear Operations on those areas of responsibility specified in the "Review" section. The proposed change eliminates the description of the chain of command but still requires that the offsite management position responsible for IOER shall report through the established organization structure and advise the Vice President-Nuclear on any safety concerns discovered during the

independent review of those areas of responsibility specified in the "Review" section. The corresponding specification in the Standard TS similarly requires that the independent review group report to and advise the Vice President-Operations on those areas of responsibility specified in the "Review" section of the TS.

b. TS 6.1.C.2.g "Records" for the Independent/Operational Event Review Group.

The existing requirement specifies that records of SEC activities delineated in the "Review" section be prepared, maintained in files, and a summary disseminated to a specified list of individuals each calendar month. The proposed change eliminates the list of individuals but still requires that a summary be disseminated to the Vice President-Nuclear, the corporate management position responsible for the quality assurance audit program and other appropriate management personnel each calendar month. The corresponding specification in the Standard TS similarly requires that the independent review group's records of reviews encompassed in the "Review" section of the Standard TS be prepared, approved, and forwarded to the Vice President-Operations within 14 days following completion of the review. Although the time requirements for the distribution of records differs between the proposed change and the Standard TS (each calendar month versus 14 days after the review is completed), the intent of this specification is preserved since the appropriate records will be prepared and disseminated to the appropriate individuals in a timely manner.

c. TS 6.1.C.3.c "Records" for the Quality Assurance Department.

The existing requirement specifies that records of the Quality Assurance Department audits be prepared, maintained in files, and disseminated to a specified list of individuals, as well as the supervisor of the area audited. The proposed change eliminates the list of individuals but still requires that the audit reports be disseminated to the Vice President-Nuclear and the management position responsible for the areas audited. The corresponding specification in the Standard TS similarly requires that audit reports encompassed by the "Audit" section of the Standard TS be prepared, approved, and distributed to the Vice President-Nuclear and the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization. Although neither the existing SPS-1&2 TS nor the proposed change requires the distribution of audit reports within 30 days after the audit, this requirement is specified in the QA Department administrative procedure. Therefore, the intent of this requirement is preserved in that audit reports will be distributed to the appropriate individuals in a timely manner.

EVALUATION

On the basis of our review of the above items, the staff concludes that the licensee has provided an acceptable response to these items as addressed in the NRC guidance on removing organization charts from the administrative

control requirements of the TS. Furthermore, the staff finds that these changes are consistent with the staff's generic finding on the acceptability of such changes as noted in Generic Letter 88-06 and more closely with the most current version of the Standard TS for Westinghouse plants which applies to SPS-1&2. Accordingly, the staff find these changes to be acceptable.

ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that these amendments involve no significant hazards considerations and there has been no public comment on such finding. Accordingly, the amendments meet 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 the amendments.

CONCLUSION

We have 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 the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Date: April 28, 1988

Principal Contributor:

Chandu Patel