

July 14, 1989

Docket No. 50-263

Mr. D. M. Musolf, Manager
Nuclear Support Services
Northern States Power Company
414 Nicollet Mall
Minneapolis, Minnesota 55401

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Dear Mr. Musolf:

SUBJECT: AMENDMENT NO. 68 TO FACILITY OPERATING LICENSE NO. DPR-22: SRO REQUIREMENTS AND REMOVAL OF CORPORATE AND PLANT ORGANIZATION CHARTS (TAC NO. 66938)

The Commission has issued the enclosed Amendment No. 68 to Facility Operating License No. DPR-22 for the Monticello Nuclear Generating Plant. This amendment consists of changes to the Technical Specifications in response to your application dated August 14, 1987, as supplemented and/or revised by letters dated January 4, February 10, and August 31, 1988.

The amendment revises Section 6 of the plant Technical Specifications to: (1) remove the figures depicting corporate and plant organizational charts and specify, in lieu thereof, general requirements that capture the essential aspects of the organizational structure that are defined by onsite and offsite organization charts, in accordance with the guidance provided in NRC Generic Letter 88-06; and (2) delete the requirement for plant management and support staff, not assigned to an operations shift, to hold a current Senior Reactor Operator license.

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

Sincerely,

~~Original~~ signed by

John J. Stefano, Project Manager
Project Directorate III-1
Division of Reactor Projects - III, IV, V
& Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 68 to License No. DPR-22
2. Safety Evaluation

cc w/enclosures:
See next page

LA/PD31:DRSP *MSR*
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*subject to
correction of
types noted
in revised TS
AWO on the SE*



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

July 14, 1989

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Mr. D. M. Musolf, Manager
Nuclear Support Services
Northern States Power Company
414 Nicollet Mall
Minneapolis, Minnesota 55401

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Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "John J. Stefano".

John J. Stefano, Project Manager
Project Directorate III-1
Division of Reactor Projects - III, IV, V
& Special Projects

Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 68 to
License No. DPR-22
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. D. M. Musolf
Northern States Power Company

Monticello Nuclear Generating Plant

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

NORTHERN STATES POWER COMPANY
DOCKET NO. 50-263
MONTICELLO NUCLEAR GENERATING PLANT
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 68
License No. DPR-22

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Northern States Power Company (the licensee) dated August 14, 1987, as supplemented and/or revised by letters dated January 4, February 10, and August 31, 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-22 is hereby amended to read as follows:

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Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No.68 , 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



Lawrence A. Yandell, Acting Director
Project Directorate III-1
Division of Reactor Projects - III, IV, V
& Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 14, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 68

FACILITY OPERATING LICENSE NO. DPR-22

DOCKET NO. 50-263

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

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246b

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6.0 ADMINISTRATIVE CONTROLS

6.1 Organization

- A. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for the safe operation and maintenance of the plant. During periods when the Plant Manager is unavailable, this responsibility may be delegated to other qualified supervisory personnel.

The Site Superintendent (or, a designated individual during periods of absence from the control room and shift supervisor's office) shall be responsible for the control room command function.

B. Offsite and Onsite Organizations

Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include positions for activities affecting plant safety.

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, function descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements are documented in corporate and plant procedures, or the Updated Safety Analysis Report or the Operational Quality Assurance Plan.
2. The Vice President Nuclear Generation 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. This position has the responsibility for the Fire Protection Program.
3. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

C. Plant Staff

1. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.1.1.
2. At least one licensed operator shall be in the control room when fuel is in the reactor.
3. At least two licensed operators shall be present in the control room during cold startup, scheduled reactor shutdown, and during recovery from reactor trips.
4. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
5. All alterations of the reactor core shall be directly supervised by a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
6. A fire brigade of at least five members shall be maintained on site at all times.* The fire brigade shall not include the three members of the shift organization required for safe shutdown of the reactor from outside the control room.
7. The General Superintendent, Operations shall be formerly licensed as a Senior Reactor Operator or hold a current Senior Reactor Operator License.
8. At least one member of plant management holding a current Senior Reactor Operator License shall be assigned to the plant operations group on a long term basis (approximately two years). This individual will not be assigned to a rotating shift.

- D. Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Superintendent Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall 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, and (3) the General Superintendent, Operations who shall meet the requirement of ANSI N18.1-1971 except that NRC license requirements are as specified in Specification 6.1.C.7. The training program shall be under the direction of a designated member of Northern States Power management.

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

- E. A training program for individuals serving in the fire brigade shall be maintained under the direction of a designated member of Northern States Power management. This program shall meet the requirement of Section 27 of the NFPA Code - 1976 with the exception of training scheduling. Fire brigade training shall be scheduled as set forth in the training program.
- F. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel. Procedures shall include the following provisions:
1. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:
 - a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
 - b. Overtime should be limited for all nuclear plant staff personnel so that total work time does not exceed 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, not more than 84 hours in any seven day period, all excluding shift turnover time. Individuals should not be required to work more than 15 consecutive days without two consecutive days off.
 - c. A break of at least eight hours including shift turnover time should be allowed between work periods.
 - d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

- e. Shift Technical Advisor (STA) and Shift Emergency Coordinator (SEC) on-site rest time periods shall not be considered as hours worked when determining the total work time for which the above limitations apply.
2. Any deviation from the above guidelines shall be authorized by the Plant Manager or designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. During plant emergencies the Emergency Director shall have this authority. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not allowed.

E. Offsite Dose Calculation Manual (ODCM)

The ODCM shall be approved by the Commission prior to initial implementation. Changes to the ODCM shall satisfy the following requirements:

1. Shall be submitted to the Commission with the Semi-Annual Radioactive Effluent release report for the period in which the change(s) were made effective. This submittal shall contain:
 - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with a revision date, together with appropriate analyses or evaluations justifying the change(s).
 - b. a determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - c. documentation of the fact that the change has been reviewed and found acceptable by the Operations Committee.
2. Shall become effective upon review and acceptance by the Operations Committee.

F. Security

Procedures shall be developed to implement the requirements of the Security Plan and the Security Contingency Plan. These implementing procedures, with the exception of those non-safety related procedures governing work activities exclusively applicable to or performed by security personnel, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager. Security procedures not reviewed by the Operations Committee shall be reviewed and approved by the Superintendent, Security and Services.

G. Temporary Changes to Procedures

Temporary changes to those procedures which are required to be reviewed by the Operations Committee described in A, B, C, D, E and F above, which do not change the intent of the original procedures may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Operator License. Such changes should be documented, reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager within one month. Temporary changes to health physics and security procedures not reviewed by the Operations Committee shall be reviewed by the Superintendent, Radiation Protection for health physics procedures and the Superintendent, Security and Services for security procedures.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 68 TO FACILITY OPERATING LICENSE NO. DPR-22
NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT
DOCKET NO. 50-263

1.0 INTRODUCTION

By letter dated August 14, 1987, as supplemented and/or revised by letters dated January 4, February 10, and August 31, 1988, Northern States Power Company (NSP or the licensee) submitted a request to amend Section 6 of the Plant Technical Specifications (TSs) to delete the requirement for plant management and support staff, not assigned to an operations shift, to hold a Senior Reactor Operator (SRO) license. The August 31, 1988 letter superseded all prior submittals to modify the figures in Section 6 of the TSs, requesting instead that those figures, which depict corporate and plant organizational charts, be entirely removed from the TSs. In lieu thereof, the licensee specified general requirements that capture the essential aspects of the organizational structure depicted in the deleted figures in accordance with the guidance provided in NRC Generic Letter 88-06, dated March 22, 1988, entitled "Removal of Organization Charts from Technical Specification Administrative Control Requirements." Part I of this Safety Evaluation presents our evaluation of the proposed change to relax the requirements for SRO licenses. Part II of this Safety Evaluation addresses the proposed deletion of corporate and plant organizational charts from the TSs.

2.0 DISCUSSION AND EVALUATION

2.1 Part 1 - Delete Requirements for Plant Management/Support Staff to Hold a Current SRO License

The TS changes proposed would add new Specifications 6.1.C.7 and 6.1.C.8 and revise Specification 6.1.D to:

- (a) delete the Licensed Senior Operator (LSO) requirement for the General Superintendent of Engineering and Radiation Protection.
- (b) change the LSO requirement to a formerly Licensed Senior Operator requirement for the General Superintendent of Operation and add the following new subitem to Specification 6.1.D: "...and (3) the General Superintendent of Operations who shall meet the requirements of ANSI N18.1-1971, except that NRC license requirements are as specified in Specification 6.1.C.7."

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- (c) add the requirement for at least one member of plant management holding a current SRO license to be assigned to the plant operations group on a long-term basis, and that individual will not be assigned to a rotating operations shift (long-term basis being at least two years).
- (d) revise Specification 6.5.G to read: "Temporary changes to those procedures which are required to be reviewed by the Operations Committee described in A, B, C, D, E and F above, which do not change the intent of the original procedures, may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Reactor Operator License." (Underscore is the proposed change).

New Specification 6.1.C.7 states that: "The General Superintendent, Operations shall be formerly licensed as a Senior Reactor Operator or hold a current Senior Reactor Operator License."

New Specifications 6.1.C.8 states that: "At least one member of plant management holding a current Senior Reactor Operator License shall be assigned to the plant operations group on a long term basis (approximately two years). This individual will not be assigned to a rotating shift."

With respect to changes (a) and (b), we do not require the individual filling the position of General Superintendent of Engineering and Radiation Protection to hold a SRO license. As for the General Superintendent Plant Operation, the latest revision of ANSI/ANS-3.8 (1987), which we endorse, does not require that the plant operations manager hold a current SRO license, provided that such a license is held by an operations middle manager. Since the licensee's proposed change will require that at least one individual in the plant operations group hold a SRO license, we find the proposed change to be consistent with ANSI/ANS-3.1 (1987) and is therefore acceptable. Changes (c) and (d) are also considered acceptable in that they are consistent with the requirements set forth in the Standard Technical Specifications, NUREG-0123.

2.2 PART II - Remove Figures Depicting Corporate And Plant Organization Charts From The TSs

The licensee's August 31, 1988 application also contained a proposal to remove figures depicting corporate and plant organization charts from Section 6 of the TSs in conformance with the example set forth in Enclosure 2 of Generic Letter (GL) 88-06.

Section 6 of the TSs specifies those administrative controls necessary to assure safe operation of the facility. We find that the general requirements proposed by the licensee for replacing the organization charts are justified because they are administrative in nature and consistent with the guidelines provided by the NRC in GL 88-06.

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 18612). This rule delineates requirements for determining the contents of the TSs. The TSs 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 technical specifications as the Commission finds appropriate.

The regulation further states that the TSs 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 included in the TSs so that the 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 the TSs contain organization charts, the practice of including organization charts in the TSs 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 the TSs 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 NRC staff for assuring this function.

As stated in 10 CFR 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.

10 CFR 50, 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 exists in the TSs.

The practice of including organization charts in the TSs was established before the advent of 10 CFR 50, Appendix B "Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants," and other associated guidance documents, such as 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 findings that the applicant is capable of operating the plant safely is not mandated by 10 CFR Part 50, Appendix B.

Safety Considerations

The fundamental safety issue in the proposal to delete organization charts from the TSs 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 licensee. Nevertheless, because the charts are in the TSs, license amendment requests have been required to effect organizational changes as simple as combining some minor functions under one organization element shown on the chart. The usefulness of the charts to the staff in the 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 matter of concern to the staff than the organization charts are required elsewhere in TSs. For example, the organizational element responsible for the control room command function is identified separately in the TSs, as are the requirements for minimum staffing under various operating modes. The organizational management functions for independent reviews and audits, unit review group and independent safety engineering groups, and shift technical advisor are also specified in other TSs. Thus, the organization 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. Over the years of experience with the details of operating organizations, the NRC staff has been able to identify 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 TSs) necessary for

the staff to find that the organization will operate the plant safely are stated below.

- a. Lines of authority, responsibility and communications 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 Updated Safety Analysis Report or QA Manual.
- b. There shall be an individual executive position (corporate officer) 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 which 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 be independent from operating pressures.
- e. Senior Reactor Operator (SRO) and Reactor Operator (RO) licenses shall continue to be required for the positions so indicated on the current TS organization charts.
- f. Other TSs which reference the current organization charts shall be revised to reference the appropriate functional responsibility or position.

The proposed changes incorporate these features to replace the organization charts being deleted. The licensee has proposed to include the information in item a above in the next update of the Monticello Safety Analysis Report. Therefore, we conclude that the removal of the organization charts from the TSs will not prevent the licensee from meeting the standards of 10 CFR 50.36 and the underlying statutory requirements and is therefore acceptable. Moreover, the deletion of unnecessary detail of organization charts will save resources for both the NRC and the licensee and will allow the NRC staff to focus on issues of importance to the plant's safety.

3.0 ENVIRONMENTAL CONSIDERATION

The amendment involves a change to recordkeeping, reporting or administrative procedures or requirements. Accordingly, the 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.

4.0 CONCLUSION

On the basis of the considerations discussed above, we conclude that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) 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 Contributor: F. R. Allenspach, NRR
J. J. Stefano, NRR

Dated: July 14, 1989