

February 18, 1987

Docket No. 50-346

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Mr. Joe Williams, Jr.  
Senior Vice President, Nuclear  
Toledo Edison Company  
Edison Plaza - Stop 712  
300 Madison Avenue  
Toledo, Ohio 43652

Dear Mr. Williams:

SUBJECT: AMENDMENT NO. 98 TO FACILITY OPERATING LICENSE NO. NPF-3

The Commission has issued the enclosed Amendment No. 98 to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1. This amendment consists of changes to the Appendix A Technical Specifications (TSs) in response to your application dated October 22, 1986 (No. 1313), as corrected November 13, 1986 (No. 1318) and in partial response to your application dated January 22, 1986 (No. 1235).

With respect to the latter application, only position titles have been changed. The remainder of that application is not acceptable as proposed as it relates to Station Review Board duties and responsibilities. We propose that a meeting be convened to discuss the issues in the near future.

This amendment revises the reporting and advising relationship of the Company Nuclear Review Board, revises certain sections to be consistent with the B&W Standard Technical Specifications, revises the composition of the Station Review Board, and reflects current organizational structure, responsibilities, and titles. The amendment involves TS Sections 6.1.1, 6.2.2, 6.2.3, 6.3.1, 6.4.1, 6.5.1, 6.5.2, 6.6.1, 6.7.1, 6.8.2, and 6.8.3, and Figures 6.2-1 and 6.2-2.

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

Sincerely,

/S/

8703030413 870218  
PDR ADDCK 05000346  
P PDR

Albert W. De Agazio, Project Manager  
PWR Project Directorate #6  
Division of PWR Licensing-B

Enclosures:

1. Amendment No. 98 to NPF-3
2. Safety Evaluation

cc w/enclosures:

See next page

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RIIngram A De Agazio GE Edison *W. De Agazio*  
2/10/87 2/10/87 2/11/87 2/11/87 2/12/87 *W. De Agazio*

Mr. J. Williams  
Toledo Edison Company

Davis-Besse Nuclear Power Station  
Unit No. 1

cc:

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

TOLEDO EDISON COMPANY

AND

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

DOCKET NO. 50-346

DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 98  
License No. NPF-3

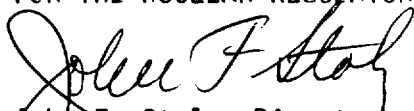
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The applications for amendment by the Toledo Edison Company and The Cleveland Electric Illuminating Company (the licensees) dated October 22, 1986, as corrected November 13, 1986, and January 22, 1986, comply with the standards 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 applications, 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. NPF-3 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 98, are hereby incorporated in the license. The Toledo Edison Company shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director  
PWR Project Directorate #6  
Division of PWR Licensing-B

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: February 18, 1987

ATTACHMENT TO LICENSE AMENDMENT NO. 98

FACILITY OPERATING LICENSE NO. NPF-3

DOCKET NO. 50-346

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

<u>Remove</u>	<u>Insert</u>
6-1	6-1
6-2	6-2
6-3	6-3
6-4a	6-4a
6-5	6-5
6-6	6-6
6-7	6-7
6-8	6-8
6-9	6-9
6-12	6-12
6-13	6-13
6-14	6-14

## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

### 6.2 ORGANIZATION

#### OFFSITE

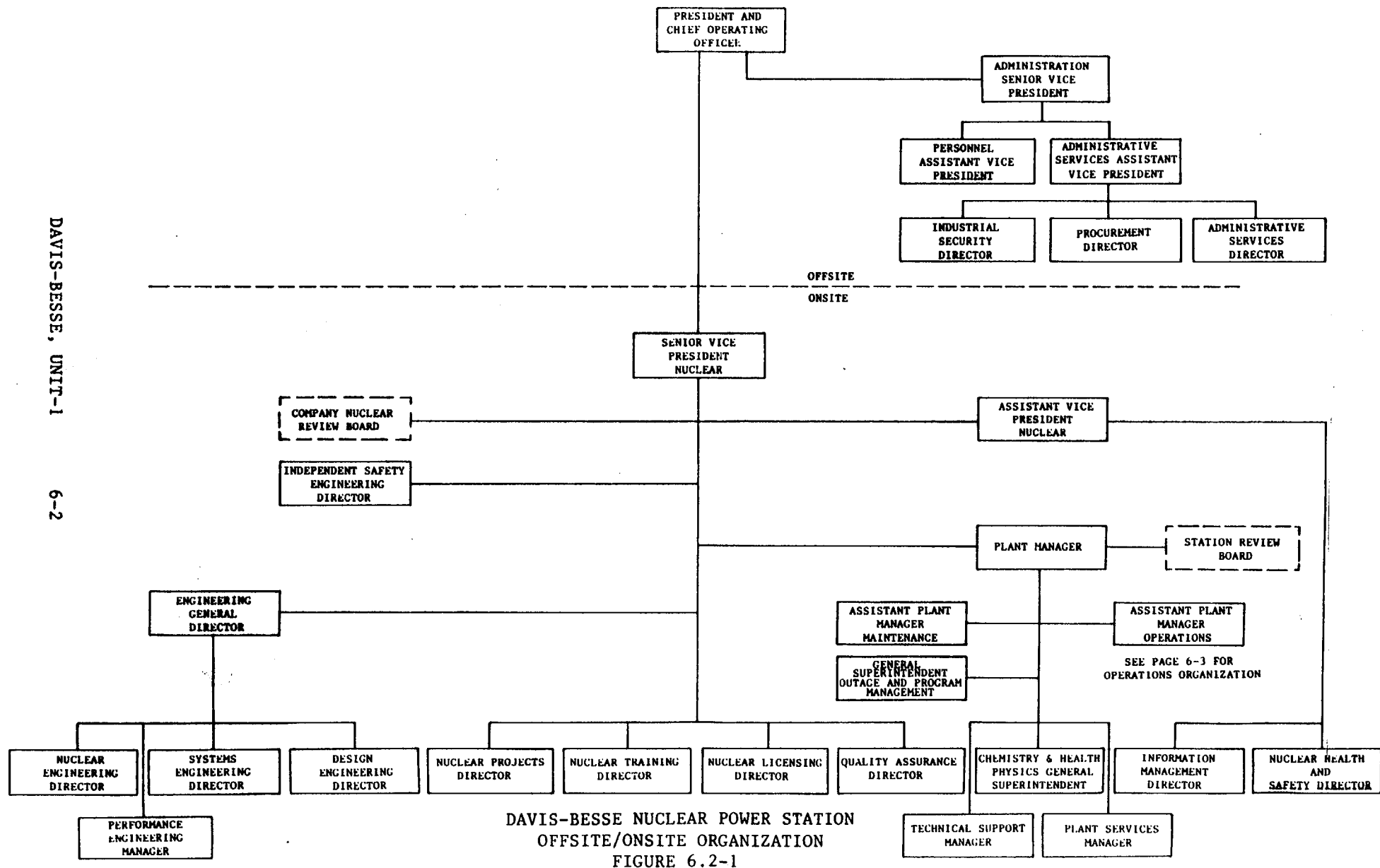
6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

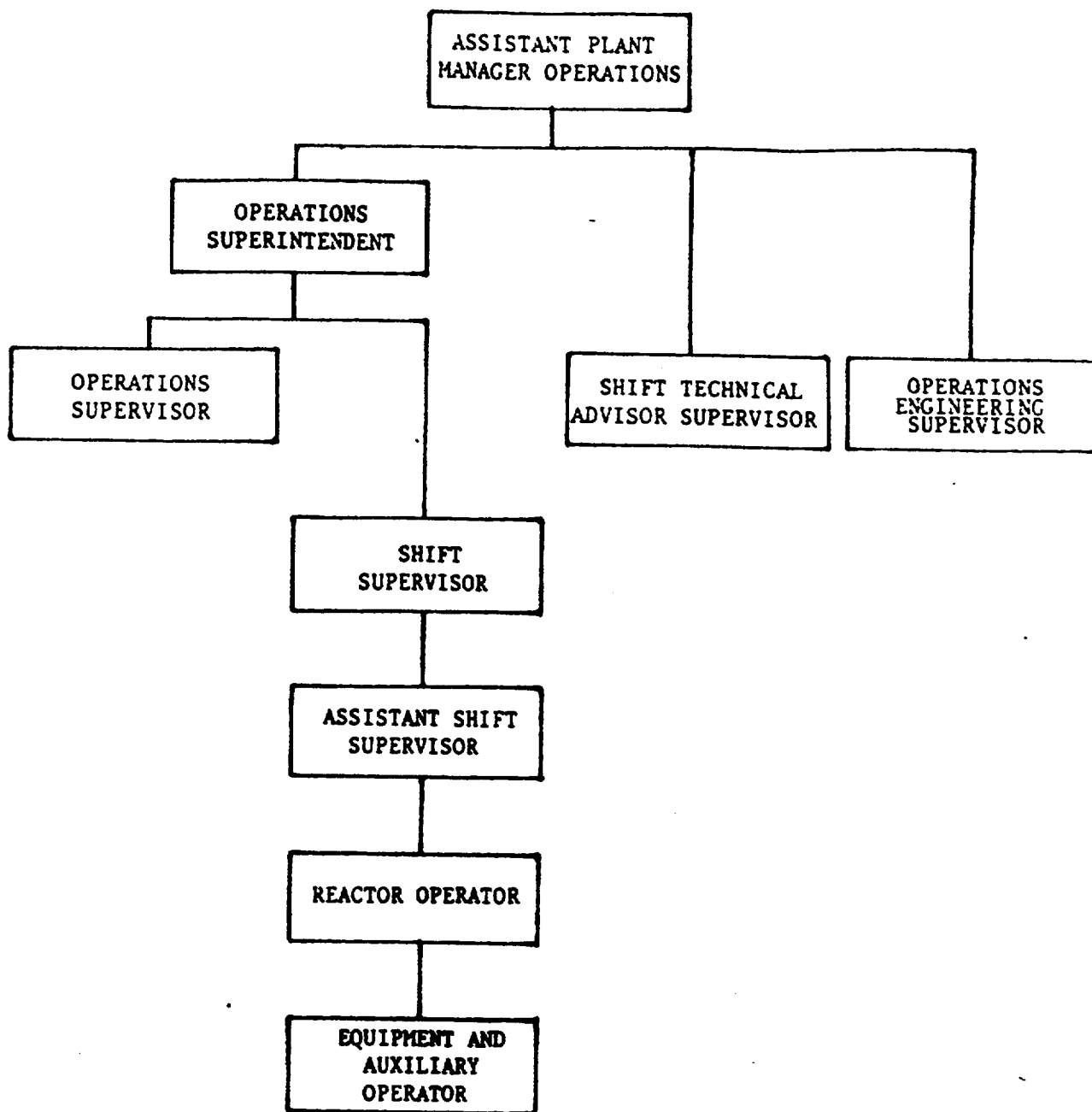
#### FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figures 6.2-1 and 6.2-2 and:

- 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 recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor#.
- e. 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.
- f. A site Fire Brigade of at least 5 members shall be maintained onsite at all times#. The Fire Brigade shall not include 3 members of the minimum Shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

# The individual qualified in radiation protection procedures and the 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, provided immediate action is taken to fill the required positions.





DAVIS-BESSE NUCLEAR POWER STATION  
OPERATIONS ORGANIZATION  
FIGURE 6.2-2



TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION#

LICENSE CATEGORY	APPLICABLE MODES	
	1, 2, 3 & 4	5 & 6
SOL	1	1*
OL	2	1
Non-Licensed	2	1
Shift Technical Advisor	1	None Required

\*Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling supervising CORE ALTERATIONS.

#Shift crew 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 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.

## 6.0 ADMINISTRATIVE CONTROLS

### FACILITY STAFF OVERTIME

- 6.2.3 Administrative procedures shall be developed and implemented to limit the working hours of facility staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

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. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, not more than 72 hours in any seven-day period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, including shift turnover time.
- 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.

Any deviation from the above guidelines shall be authorized by the Plant Manager, his designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Individual overtime shall be reviewed by Station Management to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

## ADMINISTRATIVE CONTROLS

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### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Chemistry and Health Physics General Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (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.

### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Fire Marshall and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 STATION REVIEW BOARD (SRB)

##### FUNCTION

6.5.1.1 The Station Review Board (SRB) shall function to advise the Plant Manager on all matters related to nuclear safety.

## ADMINISTRATIVE CONTROLS

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### COMPOSITION

6.5.1.2 The Station Review Board shall be composed of the:

Chairman:	Station Review Board Chairman*
Member:	Assistant Plant Manager, Operations
Member:	Assistant Plant Manager, Maintenance
Member:	Technical Support Manager
Member:	Chemistry and Health Physics General Superintendent
Member:	Operations Engineering Supervisor (Plant)
Member:	An Engineering Director or Performance Engineering Manager
Member:	Operations Quality Assurance Manager
Member:	Operations Superintendent (Plant)

\* Designated in writing by the Plant Manager. The Chairman will be drawn from SRB members.

### ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SRB activities at any one time.

### MEETING FREQUENCY

6.5.1.4 The SRB shall meet at least once per calendar month and as convened by the SRB Chairman or his designated alternate.

### QUORUM

6.5.1.5 A quorum of the SRB shall consist of the Chairman or his designated alternate and four members including alternates.

### RESPONSIBILITIES

6.5.1.6 The Station Review Board shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.

## ADMINISTRATIVE CONTROLS

- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President, Nuclear and to the Chairman of the Company Nuclear Review Board.
- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations and analyses and reports thereon as requested by the Chairman of the Company Nuclear Review Board.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Company Nuclear Review Board.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Company Nuclear Review Board.
- k. Review of any unplanned, accidental or uncontrolled radioactive releases, evaluation of the event, ensurance that remedial action is identified to prevent recurrence, review of a report covering the evaluation and forwarding of the report to the Plant Manager and to the CNRB.
- l. Review of the OFFSITE DOSE CALCULATION MANUAL and implementation of procedures at least once per 24 months.
- m. Review of the PROCESS CONTROL PROGRAM and implementation of procedures for processing and packaging of radioactive wastes at least once per 24 months.
- n. Review of the Annual Radiological Environmental Operating Report.
- o. Review of the Semiannual Radioactive Effluent Release Report.

## ADMINISTRATIVE CONTROLS

### AUTHORITY

6.5.1.7 The Station Review Board shall:

- a. Recommend to the Plant Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President, Nuclear and the Company Nuclear Review Board of disagreement between the SRB and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

### RECORDS

6.5.1.8 The Station Review Board shall maintain written minutes of each meeting and copies shall be provided to the Plant Manager, Senior Vice President, Nuclear and Chairman of the Company Nuclear Review Board.

### 6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)

#### FUNCTION

6.5.2.1 The Company Nuclear Review Board (CNRB) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

## ADMINISTRATIVE CONTROLS

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### COMPOSITION

6.5.2.2 The Company Nuclear Review Board shall be composed of the:

Chairman:	Director, Fossil Facilities Engineering and Construction
Member:	General Superintendent, Transmission and Substations
Member:	Plant Manager, Davis-Besse Station
Member:	Director, Nuclear Services
Member:	Director, Quality Assurance
Member:	General Superintendent, Fossil Generation Facilities
Member:	Director, Nuclear Safety
Member:	Director, Nuclear Facility Engineering
Member:	Others as deemed advisable by the CNRB Chairman*

### ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the CNRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNRB activities at any one time.

### CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the CNRB Chairman to provide expert advice to the CNRB.

### MEETING FREQUENCY

6.5.2.5 The CNRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.

### QUORUM

6.5.2.6 A quorum of CNRB shall consist of the Chairman or his designated alternate and at least half of the appointed CNRB members or their alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

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\*Others as deemed advisable by the CNRB chairman, who are appointed to the Company Nuclear Review Board shall have an academic degree in an Engineering or Physical Science Field; and in addition, shall have a minimum of five years of technical experience, of which a minimum of three years shall be in one or more of the areas specified in Specification 6.5.2.1.

## ADMINISTRATIVE CONTROLS

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### REVIEW

- 6.5.2.7 The Company Nuclear Review Board shall review:
- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
  - b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
  - c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
  - d. Proposed changes in Technical Specifications or this Operating License.
  - e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
  - f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
  - g. ALL REPORTABLE EVENTS.
  - h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
  - i. Reports and meetings minutes of the Station Review Board.



## ADMINISTRATIVE CONTROLS

### AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the CNRB. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire station staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Station Emergency Plan and implementing procedures at least once per 12 months.
- f. The Station Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the CNRB.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. 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.
- j. 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.
- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

## ADMINISTRATIVE CONTROLS

### AUTHORITY

6.5.2.9 The Company Nuclear Review Board shall report to and advise the Senior Vice President, Nuclear, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

### RECORDS

6.5.2.10 Records of Company Nuclear Review Board activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each CNRB meeting shall be prepared, approved and forwarded to the Senior Vice President, Nuclear and CNRB members within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President, Nuclear and CNRB members within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear and CNRB members and to the management positions responsible for the areas audited within 30 days after completion of the audit.

### 6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of SECTION 50.73 to 10 CFR PART 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SRB, and the results of this review shall be submitted to the CNRB and the Senior Vice President, Nuclear.

## ADMINISTRATIVE CONTROLS

### 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The Safety Limit violation shall be reported to the NRC Operations Center by telephone as soon as possible and in all cases within one hour. In addition the Senior Vice President, Nuclear and the CNRB shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SRB. 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.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the CNRB and the Senior Vice President, Nuclear within 14 days of the violation.

### 6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. The radiological environmental monitoring program.
- h. The Process Control Program.
- i. Offsite Dose Calculation Manual implementation.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the SRB and approved by the Plant Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

## ADMINISTRATIVE CONTROLS

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6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the SRB and approved by the Plant Manager within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include makeup, letdown, seal injection, seal return, low pressure injection, containment spray, high pressure injection, waste gas, primary sampling and reactor coolant drain systems. The program shall include the following:

- (i) Preventive maintenance and/or periodic visual inspection requirements, and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 98 TO FACILITY OPERATING LICENSE NO. NPF-3  
TOLEDO EDISON COMPANY  
AND  
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY  
DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1  
DOCKET NO. 50-346

INTRODUCTION

By letter dated July 26, 1985, Toledo Edison Company (TED or the licensee) made application for amendment to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1. The change proposed a revision to the Technical Specifications (TSs) concerning the position to which the Company Nuclear Review Board (CNRB) reported, changing it from the President and Chief Operating Officer to the Senior Vice President, Nuclear. The licensee's submittal did not address the three standards of 10 CFR 50.92(c) as required by 10 CFR 50.91. Therefore, the NRC staff requested the licensee to do so in a letter dated November 4, 1985. The licensee responded in a letter dated December 5, 1985, which addressed the three standards and added an additional proposed TS change to include the new position title, Senior Vice President, Nuclear. However, the resubmittal did not include a revised Figure 6.2-1, and since the licensee planned to submit additional TS changes concerning the organization, the staff review was held in abeyance.

On October 22, 1986, the licensee submitted an application for amendment which included the above changes and other organizational and administrative changes to bring the TSs into agreement with their existing organization. By letter dated November 13, 1986, the licensee corrected a clerical error in the October 22, 1986, application.

The proposed changes are to: revise the reporting and advising relationship between the CNRB and the President and Chief Operating Officer and Senior Vice President, Nuclear; revise specific sections to be more consistent with the Babcock and Wilcox (B&W) Standard Technical Specifications, NUREG-0103, Revision 4 (STS); revise composition of the Station Review Board (SRB) to expand the range of expertise on the SRB and to reflect recent individual and/or group responsibility, organization, and title changes; and revise organizational position titles and position responsibilities.

On January 22, 1986, the licensee submitted an application for amendment which proposed to change the duties and responsibilities of the Station Review Board. That application also included some position title changes. To insure consistency within the TSs, we have included those portions of that application which relate to title changes in our evaluation of the October 22, 1986 application.

The proposed changes from these two applications which are evaluated herein involve TS Sections 6.1.1, 6.2.2, 6.2.3, 6.3.1, 6.4.1, 6.5.1, 6.5.2, 6.6.1, and 6.7.1, and Figures 6.2-1 and 6.2-2. For consistency, corresponding title changes have also been included in Sections 6.8.2 and 6.8.3.

### EVALUATION

The licensee, in the October 22, 1986 application, has proposed to change the reporting and advising relationship of the Company Nuclear Review Board, CNRB, as delineated in Section 6.5.2.9, from reporting to the President to reporting to the Senior Vice President.

The licensee states in their July 26, 1985 submittal that when the original TSs were issued, two Vice Presidents, one of which was the Vice President, Nuclear, were designated as members of the CNRB, and because of this, the Board reported to the President and Chief Operating Officer. In License Amendment No. 76, dated November 5, 1984, the board membership was revised, removing the two Vice Presidents from board membership and reducing the CNRB from 10 to 8 and also making other title changes. The position of Senior Vice President, Nuclear, was created in a management reorganization in July 1985.

This change in reporting of the CNRB is in agreement with the B&W STS (NUREG-0103, Revision 4).

The staff has reviewed the above changes and finds that these changes are administrative in nature and have no affect on safety and are, therefore, acceptable.

Other organization title changes shown in the revised Figure 6.2-1 change the title of Station Superintendent to Plant Manager. The Assistant to the Vice President, Nuclear, is changed to Assistant Vice President, Nuclear; Administrative Service Vice President to Administration Senior Vice President; Assistant Plant Superintendent Operations to Assistant Plant Manager, Operations; Assistant Station Superintendent Outage Management to General Superintendent Outage and Program Management; the Chemist and Health Physicist to Chemistry and Health Physics General Superintendent; Technical Engineer to Technical Support Manager; Nuclear Facility Engineering Director to Engineering General Director; Nuclear Licensing Manager to Nuclear Licensing Director; and the Nuclear Training Manager to Nuclear Training Director.

The revisions to Figure 6.2-1 also include the following new positions:

- ° The Administrative Services Assistant Vice President and the Personnel Assistant Vice President report to the Administration Senior Vice President.
- ° The Independent Safety Engineering Director reports to the Senior Vice President, Nuclear.
- ° The Nuclear Health and Safety Director and the Information Management Director report to the Assistant Vice President, Nuclear.
- ° The Assistant Plant Manager, Maintenance, reports to the Plant Manager.
- ° The Nuclear Engineering Director, Performance Engineering Manager, Systems Engineering Director, and the Design Engineering Director report to the Engineering General Director.

In addition to title changes and the realignment of responsibilities, the reorganization changes the level of some of the positions. The following positions have moved higher in their reporting status which is considered an overall enhancement:

- ° The Nuclear Training Director and the Nuclear Licensing Director now report directly to the Senior Vice President, Nuclear.
- ° The Technical Support Manager and Chemistry, Health Physics General Superintendent and Assistant Plant Manager, Maintenance, now report directly to the Plant Manager.
- ° The Shift Supervisor now reports directly to the Operations Superintendent.

The following positions have moved lower:

- ° The Environmental Activities and Emergency Planning Group now report to the Nuclear Health and Safety Director, a new position that reports to the Assistant Vice President, Nuclear.

This removes the groups one step from the Senior Vice President, Nuclear, but preserves their independence from line management.

The NRC staff has reviewed the above changes and concludes that the organizational changes in most cases eliminate organizational steps to the President and enhance the position status. In the cases where the positions were moved one step further from the President, the positions' independence from the line organization was maintained. The staff concludes that the organization shown in Figures 6.2-1 and 6.2-2 is acceptable.

Other organizational changes submitted include a revision to the membership of the SRB, Section 6.5.1.2, to expand the range of expertise and to reflect changes in individual and/or group responsibilities and organization and position title changes of the reorganization. The SRB membership has been reduced by one member, the Plant Manager (formerly the Station Superintendent). Four of the eight proposed board positions are ones of equivalent expertise but with new titles, i.e., the Operations Engineer, now Plant Operations Superintendent; the Technical Engineer, now Technical Support Manager; the Chemist and Health Physicist, now Chemistry and Health Physics General Superintendent; and the Assistant Station Superintendent, now is the Assistant Plant Manager, Operations. Three former SRB positions, Lead Instrument and Control Engineer, Nuclear Performance Engineer, and Nuclear Reliability Manager have been replaced with an Engineering Director or Performance Engineering Manager, an immediate supervisor of these former members with equivalent expertise. Three new positions proposed are the Operations Quality Assurance Manager, Assistant Plant Manager, Maintenance, and Plant Operations Engineering Supervisor. These new positions add areas of expertise not previously present in the SRB. The proposed amendment also changes the SRB Chairman from the Assistant Station Superintendent (now Assistant Plant Manager, Operations) to one designated in writing by the Plant Manager from the SRB members.

Although the STS example of the makeup of the SRB includes the Plant Manager as Chairman, it is not important to the safety program that he be the Chairman nor even be a member of the board since the board's stated function is to advise the Plant Manager on all matters related to nuclear safety, and to recommend to the Plant Manager written approval or disapproval of the reviews. The Plant Manager continues to approve procedures and programs pertinent to the safe operation of the plant per TS Sections 6.8.1 and 6.8.2. The proposed change also includes the requirement that the Plant Manager appoints the SRB Chairman from the designated members.

The NRC staff concludes that these proposed changes in the SRB enhance the areas of expertise and the overall knowledge of the board and do not significantly decrease the Plant Manager's relationship with the board; therefore, the staff finds these changes acceptable.

Other TS changes proposed in addition to the position title changes are:

Figure 6.2-1 is added to Section 6.2.2.

Section 6.2.2 footnote \*\* has been deleted because it is no longer required.

Section 6.2.2 footnote # has been revised to include the radiation protection individual in the two hour absence waiver and to provide wording consistent with STS.

Section 6.7.1.a wording has been revised to provide immediate reporting to the NRC Operation Center as required by 10 CFR 50.72.



The staff has reviewed these proposed revisions and finds them to be administrative changes that bring TS wording and requirements into agreement with the Commission's regulations and STS wording; therefore, the staff finds the changes acceptable.

#### ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, 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

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 this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: February 18, 1987

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