

July 29, 1988

Docket No.: 50-416

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Mr. Oliver D. Kingsley, Jr.
Vice President, Nuclear Operations
System Energy Resources, Inc.
Post Office Box 23054
Jackson, Mississippi 39205

Dear Mr. Kingsley:

SUBJECT: ISSUANCE OF AMENDMENT NO. 45 TO FACILITY OPERATING LICENSE NO.
NPF-29 - GRAND GULF NUCLEAR STATION, UNIT 1, REGARDING REMOVAL OF
ORGANIZATION CHARTS FROM TECHNICAL SPECIFICATIONS (TAC NO. 67975)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 45 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated May 2, 1988, as revised June 3, 1988.

The amendment changes the Technical Specifications by replacing Figure 6.2.2-1, "Offsite Organization," and Figure 6.2.2-1, "Unit Organization," with requirements that capture the essential aspects of the organization structure that are defined by these figures.

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

Sincerely,

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Lester L. Kintner, Project Manager
Project Directorate II-1
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

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Enclosures:

- 1. Amendment No. 45 to NPF-29
- 2. Safety Evaluation

cc w/enclosures:
See next page

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NAME	: PAnderson : LKintner:ch: EEdensam	:	:	:	:
DATE	: 7/28/88 : 7/28/88 : 7/28/88	:	:	:	:

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Grand Gulf Nuclear Station (GGNS)

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

MISSISSIPPI POWER & LIGHT COMPANY
SYSTEM ENERGY RESOURCES, INC.
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION
DOCKET NO. 50-416
GRAND GULF NUCLEAR STATION, UNIT 1
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 45
License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that
 - A. The application for amendment by System Energy Resources, Inc., (the licensee), dated May 2, 1988, as revised June 3, 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.

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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-29 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 45, are hereby incorporated into this license. System Energy Resources, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION

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Elinor G. Adensam, Director
Project Directorate II-1
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 29, 1988

OFC	:LA:PD21	:DRPR:PM:PD21	:DRPR: LPEB:DLPO	: OGC	:D:PD21:DRPR	:
NAME	: Anderson	: LKinimer:ch	: AGody	: Ben Bondaruk	: EAdensam	:
DATE	: 7/17/88	: 7/17/88	: 7/20/88	: 7/26/88	: 7/28/88	:

ATTACHMENT TO LICENSE AMENDMENT NO. 45

FACILITY OPERATING LICENSE NO. NPF-29

DOCKET NO. 50-416

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.

<u>Remove</u>	<u>Insert</u>
xix	xix
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6-2	6-2
6-2a	6-2a
6-3	6-3
6-4	6-4

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.1.2 The Shift Superintendent or, during his absence from the Control Room, a designated individual shall be responsible for the Control Room command function. A management directive to this effect signed by the Vice President, Nuclear Operations shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit organization and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined 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 and updated at least annually.
- b. The GGNS General 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.
- c. The Vice President, Nuclear Operations 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.
- d. 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.

6.2.2 UNIT STAFF

The unit organization shall be subject to the following;

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1.
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator shall be in the Control Room.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- c. A health physics technician* shall be onsite when fuel is in the reactor.
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times*. The Fire Brigade shall not include the Shift Superintendent, the STA, the two other 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. At least one AO shall be available to respond to non-fire-fighting commands from the Control Room.
- 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.

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. 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, nor more than 72 hours in any seven-day period, all excluding shift turnover time.
3. A break of at least eight hours should be allowed between work periods, including shift turnover time.
4. 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 GGNS General Manager or his designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly

*The number of health physics technicians and Fire Brigade personnel 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.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

by the GGNS General Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- g. The Operations Superintendent, Shift Superintendents, Operations Assistants, and Shift Supervisors shall each hold a Senior Reactor Operator License.
- h. The Manager Plant Operations must have been a Senior Reactor Operator or have been certified on a plant of this type.

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISEG shall be composed of a multi-disciplined dedicated, onsite, group with a minimum assigned complement of five engineers or appropriate specialists.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 45 TO FACILITY OPERATING LICENSE NO. NPF-29
MISSISSIPPI POWER & LIGHT COMPANY
SYSTEM ENERGY RESOURCES, INC.
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION
GRAND GULF NUCLEAR STATION, UNIT 1
DOCKET NO. 50-416

1.0 INTRODUCTION

By letter dated May 21, 1988, as revised June 3, 1988, System Energy Resources, Inc. (the licensee), requested an amendment to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. The proposed amendment would change Technical Specifications (TS) 6.2.1, "Offsite Organization," and 6.2.2, "Unit Staff." The proposed changes would remove Figure 6.2.1-1, "Offsite Organization," and Figure 6.2.2-1, "Unit Organization," and replace them with a narrative description of the offsite and onsite organizations' functional requirements in TS 6.2.1 and unit staff qualifications in 6.2.2. Guidance for these proposed changes to the TS was provided to the licensee by Generic Letter 88-06, "Removal of Organization Charts from Technical Specifications," dated March 22, 1988.

2.0 BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 6.2.1 and 6.2.2 of the administrative control requirements have referenced offsite and unit (onsite) organization charts that are provided as figures to these sections. On a plant specific basis, these organization charts have been provided by applications and included in the TS issued with the operating license. Subsequent restructuring of either the offsite or 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.

Because of these limitations on effecting changes to the organizational structure, the nuclear industry has highlighted this as an area for improvement in the TS. The Shearon Harris licensee proposed changes to remove organization charts from its TS under the lead-plant concept that included the endorsement of the proposed changes by the Westinghouse Owners Group. In its review of the Shearon Harris proposal, 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 Part 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 in the TS upon 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 for Shearon Harris that were essential for conformance with regulatory requirements were added (1) to Specification 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to Specification 6.2.2 to define qualification requirements of the unit staff.

By letter dated January 27, 1988, the staff issued Amendment No. 3 to Facility Operating License NFP-63 for the Shearon Harris Nuclear Power Plant that incorporated these changes to their TS. Subsequently, the staff developed guidance on an acceptable format for license amendment requests to remove the organization charts from TS. Generic Letter 88-06 provided this guidance to all power reactors.

3.0 EVALUATION

The proposed changes to the TS are in accordance with the specific guidance provided by Generic Letter 88-06, except that a qualification requirement for three of the four top management positions on TS Figure 6.2.2-1, "Unit Organization," would not be retained in the TS. The present Figure 6.2.2-1 requires that each of the persons in these four positions must have been a licensed senior reactor operator (SRO) or have been certified on a plant of this type. The three positions for which this requirement would not be retained in the TS are the GGNS General Manager, who has overall responsibility for plant operation, and two of the managers who report to him (Manager, Plant Maintenance and Manager, Plant Support). This qualification requirement would be retained in the TS for the fourth position, Manager, Plant Operations, which also reports to the GGNS General Manager. The licensee has concluded that this qualification is essential for the position of Manager, Plant Operations because of this position's direct influence upon safe plant operations. The licensee also concluded that the other three positions for which this qualification would not be retained in the TS do not exert direct influence upon the licensed operations personnel at the facility.

The NRC staff has evaluated the licensee's proposed change in qualification requirements for the onsite organization. The NRC staff acceptance criteria for qualifications of plant operations personnel are given in NUREG-0800, "Standard Review Plan (SRP)," Section 13.1.2 - 13.1-3, Paragraph II.G. This SRP paragraph refers to Regulatory Guide 1.8, "Personnel Selection and Training," which endorses ANSI N18.1 for the qualifications of plant personnel. Section 4.2 of ANSI N18.1 requires that at the time of initial core loading or appointment to the position, the operations manager shall hold a senior reactor operator's license. ANSI N18.1 does not require the plant manager, maintenance manager or technical manager to have this qualification. The licensee's proposed

qualification requirement for the Manager, Plant Operations, is equivalent to the ANSI N18.1 requirement because it requires the person to have received SRO training, but does not require a current SRO license. The licensee's proposed deletion of this qualification requirement from the TS for the GGNS General Manager, Manager, Plant Maintenance, and Manager, Plant Support, is in accordance with ANSI N18.1, which does not require these three managers to have this qualification. Accordingly, the staff concludes that the licensee's proposed retention of this qualification in the TS for only the Manager, Plant Operation, meets the requirements of ANSI N18.1, Regulatory Guide 1.8, and SRP 13.1-2 - 13.1-3 and is, therefore, acceptable.

The remainder of the licensee's proposed changes are in accordance with the specific guidance provided by Generic Letter 88-06 and addressed the items listed below.

1. Specifications 6.2.1 and 6.2.2 were revised to delete the references to Figures 6.2.1-1 and 6.2.2-2 that were removed from the TS.
2. Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.2.1, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in the UFSAR.
3. The senior reactor operator qualified positions of the unit staff were added to Specification 6.2.2. Therefore, this requirement that was identified on the organization chart for the unit staff will be retained.
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 currently exists in the UFSAR.
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 their plant. Hence, the requirement in Generic Letter 88-06 to redefine referenced requirements as a result of the removal of these figures is not an applicable consideration for this license amendment.

On the basis of its review, 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. Accordingly, the staff finds the proposed changes to be acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, or administrative procedures or requirements. 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 these amendments.

5.0 CONCLUSION

The Commission made a proposed determination that this amendment involves no significant hazards consideration, which was published in the Federal Register (53 FR 24513) on June 29, 1988, and consulted with the State of Mississippi. No public comments or requests for hearing were received, and the State of Mississippi did not have any comments.

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

Principal Contributors: Thomas G. Dunning, OTSB/DOEA
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Dated: July 29, 1988