

July 19, 1988

Docket No. 50-382

DISTRIBUTION:

Mr. J. G. Dewease  
Senior Vice President - Nuclear Operations  
Louisiana Power and Light Company  
317 Baronne Street, Mail Unit 17  
New Orleans, Louisiana 70112

Docket File	Wanda Jones
NRC PDR	EJordan
Local PDR	JPartlow
PD4 Reading	ARM/LFMB
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PNoonan (3)	OGC-Rockville
DWigginton	EButcher
JCalvo	ACRS (10)
TBarnhart (4)	Plant File
LRubenstein	

Dear Mr. Dewease:

SUBJECT: ISSUANCE OF AMENDMENT NO. 41 TO FACILITY OPERATING LICENSE  
NPF-38 - WATERFORD STEAM ELECTRIC STATION, UNIT 3  
(TAC NO. 67370)

The Commission has issued the enclosed Amendment No. 41 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated May 20, 1988.

The amendment changes the Appendix A Technical Specifications by removing the organization charts from Section 6 in accordance with the guidance provided in Generic Letter 88-06 dated March 22, 1988.

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

Sincerely,

/s/

David L. Wigginton, Project Manager  
Project Directorate - IV  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 41 to NPF-38
2. Safety Evaluation

cc w/enclosures:  
See next page

LTR NAME: TAC 67370 AMENDMENT WATERFORD

PD4/LA PNoonan 07/6/88	PD4/PM DWigginton: 07/8/88	LPEB A. Goldy 07/11/88	OGC-Rockville 07/13/88	PD4/D JCalvo 07/19/88
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OGC/Rockville  
07/13/88

WAL  
PD4/D  
JCalvo  
07/19/88



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

July 19, 1988

Docket No. 50-382

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Senior Vice President - Nuclear Operations  
Louisiana Power and Light Company  
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A copy of the Safety Evaluation supporting the amendment is also enclosed. Notice of Issuance will be included in the Commission's next Bi-weekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. L. Wigginton".

David L. Wigginton, Project Manager  
Project Directorate - IV  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

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2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. Jerrold G. Dewease  
Louisiana Power & Light Company

Waterford 3

cc:

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Resident Inspector/Waterford NPS  
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Louisiana Public Service Commission  
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Louisiana Power & Light Company  
317 Baronne Street  
New Orleans, Louisiana 70112



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

LOUISIANA POWER AND LIGHT COMPANY

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 41  
License No. NPF-38

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Louisiana Power and Light Company (the licensee) dated May 20, 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-38 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 41, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee 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

*Walter A. Paulson*

*for* Jose A. Calvo, Director  
Project Directorate - IV  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: July 19, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 41  
TO FACILITY OPERATING LICENSE NO. NPF-38  
DOCKET NO. 50-382

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 areas 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
-	6-2a
6-3	6-3
6-4	6-4

## ADMINISTRATIVE CONTROLS

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### 6.1 RESPONSIBILITY

6.1.1 The Plant 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 Supervisor, 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, 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 operation 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 from 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 FSAR.
- b. The Senior 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.
- c. The Plant 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.
- 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

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;



## ADMINISTRATIVE CONTROLS

### UNIT STAFF (Continued)

- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room.
- c. A Health Physics Technician\* shall be on site 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 five members shall be maintained on site at all times.\* The fire brigade shall not include the Shift Supervisor, the Shift Technical Advisor, nor 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.
- f. Administrative procedures shall be developed and implemented to limit the working hours of individuals of the nuclear power plant operating staff who are responsible for manipulating plant controls or for adjusting on-line systems and equipment affecting plant safety which would have an immediate impact on public health and safety.

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, the following guidelines shall be followed:

1. An individual shall not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual shall 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 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours shall be allowed between work periods, including shift turnover time.

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\*The Health Physics Technician and 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.

## ADMINISTRATIVE CONTROLS

### UNIT STAFF (Continued)

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- c. A Health Physics Technician\* shall be on site 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 five members shall be maintained on site at all times.\* The fire brigade shall not include the Shift Supervisor, the Shift Technical Advisor, nor 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.
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ADMINISTRATIVE CONTROLS

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UNIT STAFF (Continued)

4. Except during extended shutdown periods, the use of overtime shall 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, the assistant Plant Managers, the Operations Superintendent 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 will be reviewed monthly by the Plant 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 shall hold a senior reactor operator license.

Figure 6.2-1

This Figure has been deleted.

Figure 6.2-2

This Figure has been deleted.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 41 TO

FACILITY OPERATING LICENSE NO. NPF-38

LOUISIANA POWER AND LIGHT COMPANY

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated May 20, 1988, Louisiana Power and Light Company (LP&L or the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-38) for Waterford Steam Electric Station, Unit 3. The proposed changes would remove Figure 6.2-1, Offsite Organization, and Figure 6.2-2, Unit Organization, and replace them with a narrative description of the offsite and onsite organizations functional requirements in Technical Specification (TS) 6.2.1 [and unit staff qualifications in 6.2.2]. Guidance for these proposed changes to the TS was provided to licensees and applicants by Generic Letter 88-06, 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 applicants 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. 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 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 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 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 NPF-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 organizational charts from TS. Generic Letter 88-06 provided this guidance to all power reactors.

### 3.0 EVALUATION

The licensee's proposed changes to its TS are in accordance with the 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 and 6.2-2 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 Waterford 3 updated FSAR.
- (3) The senior reactor operator and reactor operator license 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 had confirmed that this documentation currently exists in the FSAR and will be maintained in accordance with 10 CFR 50.71(e).
- (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, this is not an applicable consideration, with regard to the need to redefine referenced requirements as a result of the removal of these figures.

On the basis of its 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 to 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

This amendment relates to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. 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 the amendment.

#### 5.0 CONCLUSION

The Commission made proposed determinations that the amendment involves no significant hazards consideration, which were published in the Federal Register (53 FR 22402) on June 15, 1988. The Commission consulted with the State of Louisiana. No public comments were received, and the State of Louisiana did not have any comments.

On the basis of the considerations discussed above, the staff concludes 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 the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: July 19, 1988

Principal Contributor: Thomas G. Dunning  
D. Wigginton