

September 8, 1988

Docket No. 50-397

Mr. G. C. Sorensen, Manager
Regulatory Programs
Washington Public Power Supply System
P.O. Box 968
3000 George Washington Way
Richland, Washington 99352

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Dear Mr. Sorensen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 63 TO FACILITY OPERATING LICENSE
NO. NPF-21 - WPPSS NUCLEAR PROJECT NO. 2 (TAC NO. 65232)

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. to Facility Operating License NPF-21 to the Washington Public Power Supply System for WPPSS Nuclear Project No. 2, located in Benton County near Richland, Washington. This amendment is in response to your letter dated April 21, 1987 as supplemented by your letter of May 10, 1988.

This amendment revises WNP-2 Technical Specification Sections 6.5.1.2 and 6.8.2. The changes are limited to changes of position titles and to changes in responsibilities of designated positions. The amendment also removes Figures 6.2.1-1, 6.2.2-1a, and 6.2.2-1b and corrects typographical errors in the index.

A copy of the related safety evaluation supporting this amendment is enclosed. A Notice of Issuance will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,

Robert B. Samworth, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 63 to Facility Operating License No. NPF-21
2. Safety Evaluation

cc: w/enclosures
See next page

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

September 8, 1988

Docket No. 50-397

Mr. G. C. Sorensen, Manager
Regulatory Programs
Washington Public Power Supply System
P.O. Box 968
3000 George Washington Way
Richland, Washington 99352

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Sincerely,

A handwritten signature in dark ink, appearing to read "Robert B. Samworth".

Robert B. Samworth, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 63 to Facility
Operating License No. NPF-21
2. Safety Evaluation

cc: w/enclosures
See next page

Mr. G. C. Sorensen, Manager
Washington Public Power Supply System

WPPSS Nuclear Project No. 2
(WNP-2)

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

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

DOCKET NO. 50-397

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 63
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Washington Public Power Supply System (the Supply System, also the licensee), dated April 21, 1987 as revised by letter dated May 10, 1988 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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 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 set forth in 10 CFR Chapter I;
 - 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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P PDC

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-21 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. 63 , 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 amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Charles M. Trammell

George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: September 8, 1988

September 8, 1988

ENCLOSURE TO LICENSE AMENDMENT NO. 63

FACILITY OPERATING LICENSE NO. NPF-21

DOCKET NO. 50-397

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change.

<u>REMOVE</u>	<u>INSERT</u>
xviii	xviii
xx	xx
xx(a)	xx(a)
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6-2	6-2
6-3	6-3
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6.0 ADMINISTRATIVE CONTROLS

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 Manager (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 Director of Power Generation 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 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. These requirements are documented in the WNP-2 FSAR and updated in accordance with 10 CFR 50.71.
- b. 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.
- c. The Assistant Managing Director for 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 functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.
- e. The organization responsible for the overall quality assurance functions shall report to the Supply System Managing Director.

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;

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 unit is in OPERATIONAL CONDITION 1, 2, or 3, 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 and at least one fully qualified chemistry technician shall be on site in OPERATIONAL CONDITION 1, 2, or 3;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior 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 Manager, the Shift Technical Advisor, nor the three 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; and
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions e.g., licensed Senior Operators, licensed Operators, health physicists, chemistry technicians, 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 unit 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 unit modifications, on a temporary basis 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 7-day period, all excluding shift turnover time.
- 3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.

*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)

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 Plant Manager or his deputy, 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 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 Manager, Assistant Operations Manager, Shift Managers and Control Room Supervisors shall hold a senior reactor operator license. The Reactor Operators shall hold either a senior reactor operator license or a reactor operator license.

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TABLE 6.2.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
SM	1	1
CRS	1	None
RO	2	1
EO	2	1
STA	1	None

TABLE NOTATION

SM - Shift Manager with a Senior Operator license on WNP - Unit 2.
CRS - Individual with a Senior Operator license on WNP - Unit 2.
RO - Individual with a Operator license on WNP - Unit 2.
EO - Equipment Operator
STA - Shift Technical Advisor

Except for the Shift Manager, the shift crew composition may be one less than the minimum requirements of Table 6.2.2-1 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 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Manager from the control room while the unit is in OPERATIONAL CONDITION 1, 2 or 3, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Manager from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

ADMINISTRATIVE CONTROLS

AUDITS (Continued)

- h. The fire protection equipment and program implementation, at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least once every third year; and
- i. Any other area of unit operation considered appropriate by the CNSRB or the Managing Director.
- j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- l. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- m. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

RECORDS

6.5.2.9 Records of CNSRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each CNSRB meeting shall be prepared, approved, and forwarded to the Managing Director 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 above, shall be prepared, approved, and forwarded to the Managing Director within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Managing Director 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 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 (POC), and the results of this review shall be submitted to the CNSRB and the Assistant Managing Director for Operations.

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 NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Assistant Managing Director for Operations and the CNSRB shall be notified.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the POC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the CNSRB, and the Assistant Managing Director for Operations.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

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, Revision 2, February 1978.
- b. The applicable procedures required to implement the requirements of NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring.
- k. Health Physics/Chemistry Support Program.

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

In addition, the review and approval of the implementing procedures supporting item k. in Specification 6.8.1 will be coordinated by the Manager of Support Services, who will provide review and approval control. The WNP-2 Health Physics/Chemistry Support Program procedure will be reviewed by POC and approved by the Plant Manager.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 63 TO FACILITY OPERATING LICENSE NO. NPF-21
WASHINGTON PUBLIC POWER SUPPLY SYSTEM
WPPSS NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated April 21, 1987, Washington Public Power Supply System proposed to modify the "Administrative Controls" section of the Technical Specifications for Nuclear Plant No. 2. The proposed amendment involves changes of position titles and changes in responsibilities of designated positions. The licensee also asked to remove from the organization charts in the Technical Specifications certain positions which they believe represent unnecessary level of detail.

On March 22, 1988 NRC issued Generic Letter 88-06 encouraging licensees to propose removal of organization charts from the Technical Specifications. On May 10, 1988 the licensee submitted a revision to the April 21, 1987 amendment application. In the May 10, 1988 letter the licensee requested that the organization charts in Figures 6.2.1-1, 6.2.2-1a, and 6.2.2-1b be removed in accordance with the generic letter.

2.0 EVALUATION

The position of Technical Director (Technical Specifications Section 6.8.2) has been eliminated. This position was a support position which reported directly to the Managing Director. This support is now provided by the Deputy Managing Director and the other supporting Directors.

The position title, Support Services Director (page 6-14), has been changed to Support Services Manager to provide consistency throughout the Supply System. No deletion of support to WNP-2 or change of personnel is represented in this change.

On page 6-1 a change is made to clarify that it is the shift manager rather than the shift supervisor who is prohibited from belonging to the site fire brigade.

The staff finds that these above changes meet the criteria of Section 13.1 of NUREG-0800 and do not delete any support for WNP-2. They therefore are acceptable.

The proposal to remove the organization charts from the Technical Specifications is consistent with the staff recommendation in the Generic Letter 88-06. In the generic letter the staff examined the regulatory requirements of 10 CFR 50.36 for the administrative controls to be included in Technical Specifications. The regulation states that administrative controls are the provisions relating to organization and management necessary to ensure operation of the facility in a safe manner. It has been the staff's experience that organization charts by themselves have been of little help in ensuring that the objectives of administrative control requirements are met. Specific operational requirements are included elsewhere in the Technical Specification that bear more directly on operational safety than organization charts. As examples, the organizational element responsible for the control room command function is identified separately in Technical Specifications, as are the requirements for minimum staffing under various operating conditions. The organizational management functions for independent reviews and audits, unit review, independent safety engineering groups, and shift technical advisors are also specified in other Technical Specifications.

In summary, many of the details shown on the onsite and offsite organization charts are not essential to the safe operation of the facility. Over the years, the staff experience with changes in the details of operating organizations has shown that organization charts can be modified in many ways while maintaining adequate operational safety. This experience has enabled the staff to identify those organizational characteristics that are important to safety. The staff finds that the only aspects of organization charts that are important to safety and not covered by other specifications (thus must remain in the Technical Specifications) are those conditions listed below:

- (1) 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. Those 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.
- (2) Designation of an executive position that has corporate responsibility for overall plant nuclear safety and authority to take such measures as may be needed to ensure acceptable performance of staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- (3) Designation of a management position in the onsite organization that is responsible for overall unit operation and has control over those onsite activities necessary for safe operation and maintenance of the plant.
- (4) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license.

- (5) Provisions of sufficient organizational freedom to be independent of operational pressures to those individuals who perform the functions of health physics, quality assurance and training of the operating staff.

Since the proposed amendment included the above conditions in the Technical Specifications, removal of the organization charts represents no reduction in current plant safety. These changes will simply allow the licensee to implement changes in their organization structure without obtaining NRC approval.

The proposed amendment requires that the licensee must ensure that the organizational information described in (1) above is incorporated in the Final Safety Analysis Report.

The qualifications for certain positions are currently designated by organization charts as requiring a SRO or RO license. These requirements are added to the Technical Specifications by this amendment.

The index has been revised to reflect the removal of organizational charts.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves changes to administrative procedures and reporting 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.

4.0 CONTACT WITH STATE OFFICIAL

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (52 FR 34021) on September 9, 1987. On July 13, 1988, the Commission published a second proposed determination following the May 10, 1988 letter (53 FR 26535). The staff consulted with the State of Washington. No public comments were received, and the State of Washington did not have any comment.

5.0 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.

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Dated: September 8, 1988