

July 25, 1988

Docket Nos.: 50-275  
and 50-323

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Mr. J. D. Shiffer, Vice President  
Nuclear Power Generation  
c/o Nuclear Power Generation, Licensing  
Pacific Gas and Electric Company  
77 Beale Street, Room 1451  
San Francisco, California 94106

Dear Mr. Shiffer:

SUBJECT: ISSUANCE OF AMENDMENTS IN RESPONSE TO LAR 88-06 (TAC NOS. 68224  
AND 68225)

The Commission has issued the enclosed Amendment No. 29 to Facility Operating License No. DPR-80 and Amendment No. 28 to Facility Operating License No. DPR-82 for the Diablo Canyon Nuclear Power Plant, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications in response to your application transmitted by letter dated May 20, 1988 (reference License Amendment Request 88-06).

These amendments revise Technical Specifications Section 6, Administrative Controls, by removing the organization charts and changing the titles of certain management personnel, consistent with NRC Generic Letter 88-06.

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

Sincerely,

original signed by

Harry Rood, Senior Project Manager  
Project Directorate V  
Division of Reactor Projects - III,  
IV, V and Special Projects

Enclosures:

- 1. Amendment No. 29 to DPR-80
- 2. Amendment No. 28 to DPR-82
- 3. Safety Evaluation

cc w/enclosures:

See next page

\*See previous concurrence

*DRSP/PD5	*DRSP/PD5	*DEST/SRXB	*OGC	DRSP/PD5
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07/11/88	07/11/88	07/12/88	07/14/88	07/15/88

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

July 25, 1988

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Sincerely,

A handwritten signature in cursive script that reads "Harry Rood".

Harry Rood, Senior Project Manager  
Project Directorate V  
Division of Reactor Projects - III,  
IV, V and Special Projects

Enclosures:

1. Amendment No. 29 to DPR-80
2. Amendment No. 28 to DPR-82
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cc w/enclosures:  
See next page

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

PACIFIC GAS AND ELECTRIC COMPANY  
DIABLO CANYON NUCLEAR POWER PLANT, UNIT 1  
DOCKET NO. 50-275  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 29  
License No. DPR-80

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Pacific Gas & Electric 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 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;
  - 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. DPR-80 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. 29 , are hereby incorporated in the license. Pacific Gas & Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment becomes effective at the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

  
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: July 25, 1988



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

PACIFIC GAS AND ELECTRIC COMPANY  
DIABLO CANYON NUCLEAR POWER PLANT, UNIT 2  
DOCKET NO. 50-323  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 28  
License No. DPR-82

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Pacific Gas & Electric 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 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;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;  
and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-82 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. 28 , are hereby incorporated in the license. Pacific Gas & Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment becomes effective at the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



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: July 25, 1988



ATTACHMENT TO LICENSE AMENDMENT NOS. 29 AND 28  
FACILITY OPERATING LICENSE NOS. DPR-80 AND DPR-82  
DOCKET NOS. 50-275 AND 50-323

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>
xxi	xxi
6-1	6-1
6-2	6-2
6-3	6-3
6-5	6-5
6-6	6-6
6-7	6-7
6-23	6-23

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ADMINISTRATIVE CONTROLS

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## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall plant 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 Power Generation shall be reissued to all plant personnel on an annual basis.

### 6.2 ORGANIZATION

#### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include 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 FSAR Update.
- 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 Vice President - Nuclear Power Generation shall have corporate responsibilities 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 PLANT STAFF

- 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. In addition, while the unit 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;

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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.

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TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION		
	BOTH UNITS IN MODE 1, 2, 3, OR 4	BOTH UNITS IN MODE 5 OR 6 OR DEFUELED	ONE UNIT IN MODE 1, 2, 3 OR 4 AND ONE UNIT IN MODE 5 OR 6 OR DEFUELED
SS	1	1	1
SOL	1	none <sup>b</sup>	1
OL	3 <sup>a</sup>	2 <sup>a</sup>	3 <sup>a</sup>
AO	3 <sup>a</sup>	3 <sup>a</sup>	3 <sup>a</sup>
STA	1*	none	1*

- SS - Shift Supervisor with a Senior Operators License
- SOL - Individual with a Senior Operator License
- OL - Individual with an Operator License
- AO - Auxiliary Operator
- STA - Shift Technical Advisor

The Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 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 6.2-1. 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 Supervisor from the control room while the unit is in MODE 1, 2, 3 or 4, 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 Supervisor from the control room while the unit is in MODE 5 or 6, an individual with a valid Senior Operator or Operator license shall be designated to assume the control room command function.

<sup>a/</sup> At least one of the required individuals must be assigned to the designated position for each unit.

<sup>b/</sup> At least one licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling must be present during Core Alterations on either unit, who has no other concurrent responsibilities.

\*The STA position shall be manned in MODES 1, 2, 3, and 4 unless the Shift Supervisor or the individual with a Senior Operator license meets the qualifications for the STA as required by the NRC.

## ADMINISTRATIVE CONTROLS

### PLANT STAFF (Continued)

- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or 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 onsite at all times. The Fire Brigade shall not include the Shift Supervisor and 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 plant staff who perform safety-related functions; e.g., licensed Senior Operators, licensed 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 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 plant 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; and
- 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 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 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; and

- g. The Operations Manager shall hold a senior reactor operator license.

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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

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### 6.2.3 ONSITE SAFETY REVIEW GROUP (OSRG)

#### FUNCTION

6.2.3.1 The OSRG shall function to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety. The OSRG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Manager, Nuclear Operations Support.

#### COMPOSITION

6.2.3.2 The OSRG shall be composed of at least five engineers located on site.

#### RESPONSIBILITIES

6.2.3.3 The OSRG shall be responsible for maintaining surveillance of plant activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4 The Shift Technical Advisor shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the plant.

### 6.3 PLANT STAFF QUALIFICATIONS

6.3 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 for Radiation Protection Manager. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.

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\*Not responsible for sign-off function.



## ADMINISTRATIVE CONTROLS

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### 6.4 TRAINING

6.4 A retraining and replacement training program for the plant staff shall be maintained under the direction of a designated member of the facility staff 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 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT STAFF REVIEW COMMITTEE (PSRC)

##### FUNCTION

6.5.1.1 The Plant Staff Review Committee shall function to advise the Plant Manager on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The Plant Staff Review Committee shall be composed of the:

Chairman:	Plant Manager
Member:	Assistant Plant Manager, Operations Services
Member:	Operations Manager
Member:	Assistant Plant Manager, Support Services
Member:	Quality Control Manager
Member:	Assistant Plant Manager, Maintenance Services
Member:	Assistant Plant Manager, Technical Services
Member:	Radiation Protection Manager

##### ALTERNATES

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

##### MEETING FREQUENCY

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

##### QUORUM

6.5.1.5 The minimum quorum of the PSRC necessary for the performance of the PSRC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and two members one of which may be an alternate.

## ADMINISTRATIVE CONTROLS

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### HIGH RADIATION AREA (Continued)

- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Radiation Protection Manager in the WPR.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved WPR which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the WPR, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

### 6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee initiated changes to the PCP:

- a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
  - 1) Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
  - 2) A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
  - 3) Documentation of the fact that the change has been reviewed and found acceptable by the PSRC.
- b. Shall become effective upon review and acceptance by the PSRC.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 29 TO FACILITY OPERATING LICENSE NO. DPR-80  
AND AMENDMENT NO. 28 TO FACILITY OPERATING LICENSE NO. DPR-82  
PACIFIC GAS AND ELECTRIC COMPANY  
DIABLO CANYON NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-275 AND 50-323

1.0 INTRODUCTION

By letter dated May 20, 1988, Pacific Gas and Electric Company (PG&E or the licensee) requested amendments to the Technical Specifications (TS) appended to Facility Operating License Nos. DPR-80 and DPR-82 for the Diablo Canyon Nuclear Power Plant, (DCNPP) Unit Nos. 1 and 2. The proposed amendments would change the DCNPP Combined Technical Specifications by revising TS Section 6.2, "Administrative Controls," to remove Figure 6.2-1 "Offsite Organization" and Figure 6.2-2 "Plant Organization". General requirements that address the essential aspects of the organizational structure that are defined by the existing organization charts are added. These amendments also change the titles of certain Plant Staff Review Committee members in Administrative Controls Sections 6.2.2, 6.3, 6.5.1.2, and 6.12.1.

2.0 EVALUATION

The NRC staff has evaluated the proposed changes and has concluded that they are acceptable. The staff's evaluation is given below.

A. Removal of Licensee Organization Charts from the TS

The content required in the Administrative Controls Section of the Technical Specifications is specified in 10 CFR 50.36.c(5). That provision requires that the technical specifications contain provisions relating to organization and management procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner. It does not specifically require inclusion of organizational charts in the technical specifications.

In Generic Letter (GL) 88-06, "Removal of Organizational Charts from Technical Specification Administrative Controls Requirements", dated March 22, 1988, the NRC has provided guidance for the removal of organization charts from the TS. Generic Letter 88-06 concludes that

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the removal of organization charts from the technical specifications will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure.

With regard to Diablo Canyon, the licensee states that removal of the organization charts from the technical specifications will not affect plant operations. Specific operational requirements are detailed in other technical specifications that bear more directly on operational safety than the organization charts.

As in the past, the NRC will continue to be informed of organizational changes and management personnel titles through other required controls. For example, 10 CFR Part 50.34(b)(6)(i) requires that the applicant's organizational structure be included in the FSAR. Consistent with Generic Letter 88-06, Section 13.1 of the FSAR Update currently provides a functional description of the organization, a functional description of key personnel positions, and detailed organization charts. The organization charts in the DCPD FSAR Update are more detailed than those presently in the technical specifications. As required by 10 CFR 50.71(e), the licensee submits annual revisions to the FSAR Update.

The removal of the organization charts and title changes represent no reduction in the current safety requirements, because the following conditions are included in the technical specifications by these amendments, per the recommendations of GL 88-06:

- (1) A requirement that 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 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 operation (SRO) or reactor operation 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 operating staff.

As discussed above, because removal of licensee organization charts from the DCNPP TS meets the requirements of 10 CFR 50.36, and because these amendments meet the guidelines of Generic Letter 88-06, the NRC staff finds them acceptable.

#### B. Changes in Titles of Plant Staff Review Committee Members

In addition to removal of the organization charts, these amendments make changes in the titles of certain Plant Staff Review Committee members. These changes are being made to reflect recently proposed organizational changes.

Both the change to the titles of certain Plant Staff Review Committee members and the change to reflect that the Plant Manager (rather than Plant Superintendent) is authorized to make changes to the guidelines for plant staff working hours are administrative changes to reflect the proposed new DCPP organization. These changes do not affect the number of members, composition, or function of the DCNPP Plant Staff Review Committee. On this basis, the NRC staff finds these changes to be acceptable.

### 3.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Chief of the Radiological Health Branch, State Department of Health Services, State of California, of the proposed determination of no significant hazards consideration. No comments were received.

### 4.0 ENVIRONMENTAL CONCLUSION

These amendments involve changes in administrative procedures and requirements. Accordingly, these 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

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 (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: July 25, 1988