



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

MARCH 22, 1988

TO ALL POWER REACTOR LICENSEES AND APPLICANTS

SUBJECT: REMOVAL OF ORGANIZATION CHARTS FROM TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROL REQUIREMENTS (Generic Letter 88-06)

Typically onsite and offsite organizations are defined by organization charts included under administrative control requirements of the Technical Specification (TS). This requires the processing of a license amendment to change an organization chart before implementing a change in organizational structure. The guidance provided in this Generic Letter addresses amendments that may be proposed for removing organization charts from the administrative control requirements of the TS.

The staff has determined that with appropriate changes to these administrative control requirements, the onsite and offsite organization charts may be removed. The changes involve the addition of general requirements that capture the essential aspects of the organizational structure that are defined by existing onsite and offsite organization charts. Enclosure 1 provides guidance for license amendment requests to remove organization charts from TS.

Enclosure 2 provides an example of this change that was made to the administrative control requirements of the existing Westinghouse Standard Technical Specifications (STS). The staff has found that this change will not reduce plant safety and it is generically applicable to all power reactors.

The removal of organization charts is a line item improvement that was proposed on a lead-plant basis for the Shearon Harris plant and was endorsed by the Westinghouse Owners Group. This change was reviewed as part of the NRC's program for improvements in TS. The objectives of that program were established by the Commission's Interim Policy Statement on Technical Specification Improvements. The staff concludes that the removal of organization charts from TS will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure, consistent with Commission policy.

Licensees and applicants are encouraged to propose changes to their TS that are consistent with the guidance provided in Enclosure 1. Proposed license amendments conforming to this guidance will be reviewed and approved quickly

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by the appropriate Project Manager while those that deviate from this guidance will require a more detailed review. If you have any questions on this matter, please contact the Project Manager for your facility.

Sincerely,



Frank Q. Miraglia
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures: *Computer Printout: see jacket*
As stated

**GUIDANCE FOR REMOVAL OF ORGANIZATION CHARTS
FROM TECHNICAL SPECIFICATIONS**

INTRODUCTION

This enclosure provides guidance for the preparation of license amendments for the removal of onsite and offsite organization charts from Technical Specifications (TS). It involves the addition of general requirements that capture the essential aspects of the organizational structure that are defined by existing organization charts.

This guidance was developed by the NRC staff based on its review of a lead-plant proposal submitted on the Shearon Harris docket and endorsed by the Westinghouse Owners Group. The benefit of this proposal is that it would permit a licensee to implement changes to the structure of the offsite or onsite organizations without first having to obtain NRC approval through the issuance of a license amendment to update organization charts in TS.

DISCUSSION

The staff examined the regulatory requirements for administrative controls in TS provided in 10 CFR 50.36. This 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 required elsewhere in TS 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 TS, as are the requirements for minimum staffing under various operating conditions. The organizational management functions for independent reviews and audits, unit review and independent safety engineering groups, and shift technical advisors are specified in other TS.

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 distill those organizational characteristics which are important to safety. The staff finds that the only aspects of organization charts which are important to safety, are not covered by other specifications, and must remain in TS are those conditions listed below.

- (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 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 above conditions will be maintained in the TS, removal of the organization charts represents no reduction in current safety requirements. These changes will simply allow licensees to implement changes in their organization structure without obtaining NRC approval.

The licensee or applicant must ensure that the organizational information described in (1) above is incorporated in a document (Final Safety Analysis Report, Quality Assurance Plan, or other appropriate document) to be referenced in the revised TS before the amendment to remove the organization charts is proposed.

The qualifications for certain positions are currently designated by organization charts as requiring a SRO or RO license. If these requirements are not currently specified in TS outside of the organization charts (such as the minimum shift crew composition), they should be added to an appropriate specification.

Finally, the plant TS should be examined for additional references to the organization charts. Where such references are included in administrative control requirements, they must be replaced by an appropriate functional description of the requirement that was defined by the organization charts.

As guidance on the format of the changes discussed above, an annotated copy of the Standard Technical Specifications for Westinghouse plants is provided as Enclosure 2 with (1) deleted material shown in strike out text and (2) additions to existing requirements shown underlined. On a plant-specific basis, the form of proposed changes may differ from this guidance to the extent that differences may exist in the titles or names of various positions or the enclosed example.

SUMMARY

The removal of the organization charts from the TS will entail the addition or modification of existing requirements as noted above. If the FSAR or Quality Assurance Plan, or other appropriate documentation does not currently contain organization charts to at least the level of detail as shown on those which are

proposed to be removed from the TS, the licensee or applicant should first complete that action which will ensure that the organization information is included in appropriate documentation.

Any question on this matter should be directed to the Project Manager for your facility.

MARKUP OF WESTINGHOUSE STANDARD TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS6.1 RESPONSIBILITY

6.1.1 The [Plant Superintendent] 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 Foreman (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 [highest level of corporate management] shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATIONOFFSITE

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS ~~The offsite organization for unit management and technical support shall be as shown in Figure 6-2-1.~~

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, or in equivalent forms of documentation. These requirements shall be documented in [plant document, e.g., FSAR or QA Plan.]
- b. The [Plant Superintendent] 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 [a specified corporate executive position] 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.

ADMINISTRATIVE CONTROLS

- 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.

UNIT-STAFF

6.2.2 UNIT STAFF ~~The unit organization shall be as shown in Figure 6.2-2 and~~

a. through f. (No change.)

- g. The [positions as specified on current organization charts] shall hold a senior reactor operator license. The [positions as specified on current organization charts] shall hold a reactor operator license.

(No other changes for remaining specifications.)

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ENCLOSURE 3

LIST OF RECENTLY ISSUED GENERIC LETTERS

Generic Letter No.	Subject	Date of Issuance	Issued To
GL 88-05	BORIC ACID CORROSION OF CARBON STEEL REACTOR PRESSURE BOUNDARY COMPONENTS IN PWR PLANTS	03/17/88	ALL LICENSEES OF OPERATING PWRs AND HOLDERS OF CONSTRUCTION PERMITS FOR PWRs
GL 88-04	DISTRIBUTION OF GEMS IRRADIATED IN RESEARCH REACTORS	02/23/88	ALL NON-POWER REACTOR LICENSEES
GL 88-03	REGULATION OF GENERIC SAFETY ISSUE 93, "STEAM BINDING OF AUXILIARY FEEDWATER PUMPS"	02/17/88	ALL LICENSEES, APPLICANTS FOR OPERATING LICENSES, AND HOLDERS OF CONSTRUCTION PERMITS FOR PRESSURIZED WATER REACTORS
GL 88-02	"INTEGRATED SAFETY ASSESSMENT PROGRAM II (ISAP II)"	01/20/88	ALL POWER REACTOR LICENSEES
GL 88-01	"NRC POSITION ON IGSCC IN BWR AUSTENITIC STAINLESS STEEL PIPING"	01/25/88	ALL LICENSEES OF OPERATING BOILING WATER REACTORS AND HOLDERS OF CONSTRUCTION PERMITS FOR BWRs
GL 87-16	NUREG-1262, "ANSWERS TO QUESTIONS AT PUBLIC MEETINGS RE IMPLEMENTATION OF 10 CFRSS ON OPERATORS LICENSES"	11/12/87	ALL POWER AND NONPOWER REACTOR LICENSEES AND APPLICANTS FOR LICENSES
GL 87-15	POLICY STATEMENT ON DEFERRED PLANTS	11/04/87	ALL HOLDERS OF CONSTRUCTION PERMITS FOR A NUCLEAR POWER PLANT
GL 87-14	REQUEST FOR OPERATOR LICENSE SCHEDULES	08/04/87	ALL POWER REACTOR LICENSEES
GL 87-13	INTEGRITY OF REQUALIFICATION EXAMINATIONS AT NON-POWER REACTORS	07/10/87	ALL NON-POWER REACTOR LICENSEES

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