

## **4.0 ORGANIZATION AND ADMINISTRATION**

### **4.1 CONDUCT OF REVIEW**

This chapter of the revised draft Safety Evaluation Report (DSER) reviews the organization and administration information presented in Chapter 4 of the revised Construction Authorization Request (CAR). The staff used Chapter 4 in NUREG-1718, "Standard Review Plan for the Review of an Application for a Mixed Oxide (MOX) Fuel Fabrication Facility," (Reference 4.3.1), as guidance in performing the review. The objective of the review is to determine whether organizational and administrative functions have been identified which will enable the applicant to plan, implement, and control site activities in a manner that adequately ensures the safety of workers and the public, and which will protect the environment. This review also ensures that the qualifications for key management positions are adequate. Organizational information is also described in the applicant's quality assurance plan, which is discussed in revised DSER Chapter 15.

#### **4.1.1 Organization**

The applicant proposed a functional organization for engineering, design, and construction that includes lines of responsibility and control of engineering, design, construction, procurement, administrative services, environmental health and safety, licensing, and quality assurance. Proposed organization charts showing lines of responsibility and communications were provided.

The President of Duke Cogema Stone & Webster (DCS) has overall responsibility for the project. Reporting to the President are managers responsible for licensing and safety analysis; environment, safety, and health; facility manufacturing; facility engineering; construction management; procurement; plant operations and startup; project services and administration; site integration; and quality assurance. The quality assurance manager has a direct line of communication to the Project Manager and is unencumbered with responsibilities for costs or schedules.

Management of process and facility design will be provided directly by the applicant. The applicant will be responsible for planning, managing, and controlling construction activities. Construction subcontractors will be managed by the Construction Management Manager. At this time, no subcontractors have been selected for construction activities.

The organizational information provided by the applicant sets forth clear and unambiguous controls and communications between organizational groups responsible for designing and constructing the facility. Lines of communication, responsibility, and authority are clearly delineated in the organization chart. The President has overall responsibility for all design and construction activities.

#### **4.1.2 Administration**

If the CAR is approved, the applicant will transition the design and construction phase of the proposed facility to the operating phase. During any construction of the proposed facility, the Construction Management Manager would be assigned a greater work scope and level of

resources. Concomitant with the increased Construction Management Manager scope of work, a decreased work scope and level of resources would be assigned to the Facilities Design and Process Design Managers. Toward the completion of any potential construction activities, the construction organization would shift to a manufacturing organization consisting of a corporate-level Plant Manager responsible for safety, plant operations, maintenance, and quality assurance. Reporting to the Plant Manager would be an Operations Manager, a Regulatory Management Manager, a Security Manager, an Administration Manager, and a Quality Assurance Manager. If plant systems are completed, acceptance tests would be performed followed by turnover to the operations organization. The operations organization would then be responsible for maintenance and configuration management of the systems.

Formal management controls described in Chapter 15.0, "Management Measures," of this revised DSER would be applied to ensure that there is reasonable assurance that design bases are maintained during any transition between design and construction activities and operations.

#### **4.1.3 Key Management Positions**

The management positions described in Section 4.1.1, above, have responsibilities for activities involving the proposed facility. The applicant also provided the minimum qualifications for each of these positions.

The scope and number of each key management position are described appropriately for each management function involving the proposed facility. The qualifications requirements for key management positions provide an adequate breadth and level of experience for their respective responsibilities and authorities. The staff filling key management positions will be available during the design and potential construction phases of the project.

### **4.2 EVALUATION FINDINGS**

The staff reviewed the organization and administration for construction approval of the proposed facility in accordance with Chapter 4.0 of NUREG-1718 (Reference 4.3.1). The staff evaluated the proposed organization for design and construction; the administration of the project, including how the project would transition from design and construction to operations; and the responsibilities, qualifications, and authorities of key management positions. The proposed organization, administration, and key management position descriptions and qualifications are consistent with guidance in NUREG-1718, and are acceptable.

The issue of whether the design bases of the principal structures, systems, and components (PSSCs) of the proposed facility would provide reasonable assurance of protection against natural phenomena and the consequences of potential accidents are addressed in other chapters of this revised DSER.

### **4.3 REFERENCES**

- 4.3.1 U.S. Nuclear Regulatory Commission (U.S.)(NRC). NUREG-1718, "Standard Review Plan for the Review of an Application for a Mixed Oxide Fuel Fabrication Facility." NRC: Washington, D.C. 2000.