



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

John A. Scalice
Site Vice President, Watts Bar Nuclear Plant

JUN 29 1996

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of) Docket No. 50-390
Tennessee Valley Authority)

WATTS BAR NUCLEAR PLANT (WBN) - TECHNICAL SPECIFICATION (TS)
CHANGE 96-007

The purpose of this letter is to request that Appendix A of Facility Operating License NPF-90, Watts Bar Unit 1 TS, be amended in accordance with 10 CFR 50.90 to modify the requirement under TS Section 5.2.2.f for the Operations Manager to hold or have held a Senior Reactor Operator (SRO) license. This change is consistent with TVA's commitment to ANSI N18.1-1971 regarding the qualification of this position.

The proposed amendment revises the requirements associated with the Operations Manager position to be consistent with the Standard Technical Specifications (STS). The result of this change will provide TVA with greater flexibility in regard to management development assignments for key plant personnel. TVA desires to initiate this developmental practice as soon as possible. Therefore, an expedited review of the amendment is requested.

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A complete description of the proposed amendment, and the bases for it, are included in Enclosure 1. TVA's determination of no significant hazards consideration, as required by 10 CFR 50.91(a), is included in Enclosure 2. Proposed revised TS pages are included in Enclosure 3.

The proposed amendment has been reviewed and approved by the Watts Bar Plant Operations Review Committee and Nuclear Safety Review Board.

In accordance with 10 CFR 50.91(b)(1), a copy of this proposed license amendment is being forwarded to the State Designee for the State of Tennessee.

If you should have any questions, please contact P. L. Pace at (423) 365-1824.

Sincerely,



J. A. Scalice

Sworn to and subscribed before me
this 29th day of June 1996

Notary Public E. Jeannette Long
My Commission Expires July 1, 1997

Enclosures

cc: See page 3

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cc (Enclosures):

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ENCLOSURE 1

PROPOSED LICENSE AMENDMENT
ORGANIZATIONAL CHANGE

I. Description of Proposed License Amendment

The proposed amendment revises the Watts Bar Unit 1 TS requirements to delete the first sentence of Section 5.2.2.f which reads, "The Operations Manager shall hold or have held an SRO license on a similar unit." The remaining sentence of this section is being revised to indicate that the Operations Superintendent will hold a valid SRO license for WBN Unit 1. The result of this change will provide TVA with greater flexibility in regard to management development assignments for key plant personnel.

II. Basis for Proposed License Amendment

Appendix B of the TVA Nuclear Quality Assurance Plan (NQAP), TVA-NQA-PLN89-A, defines measures through which TVA will comply with NRC Regulatory Guide 1.8, "Personnel Selection and Training." Through this commitment to Regulatory Guide 1.8, TVA complies with ANSI Standard N18.1-1971 and ANS-3.1-1981, the ANSI Standards endorsed by Regulatory Guide 1.8. Section 13.1.3 of the Watts Bar Final Safety Analysis Report (FSAR) correlates the position of Operations Manager to Section 4.2.1 of ANSI Standard N18.1-1971, "Plant Managers." The requirements of N18.1-1971 for "Plant Managers" does not require that an SRO license be held. What is primarily required is that the individual has acquired the experience and training normally required for examination for an SRO license. This requirement may be reduced if alternates for the position meet the experience and training requirements. In addition, STS 5.2.2.f, does not indicate that the Operations Manager must hold an SRO license. Rather, it allows for one or more positions to be defined, from which one of the individuals must have an SRO license. Therefore, the existing wording of TS 5.2.2.f is more restrictive than required by TVA's commitment to ANSI Standard N18.1-1971 and the STS. In addition, the education and experience requirements of ANSI Standard N18.1-1971 or ANS-3.1-1981 are controlled through site procedures to ensure that the qualifications of the individual in the Operations Manager position are appropriate for the senior manager of the Operations staff.

Section 13.1.3 of the Watts Bar FSAR correlates the position of Operations Superintendent to Section 4.2.2 of ANSI Standard N18.1-1971, "Operations Manager." The proposed change further aligns the TS with the requirements of N18.1-1971 for the Watts Bar position of Operations Superintendent in that the Operations Superintendent will be required to be a licensed SRO at Watts Bar.

The attachment to this enclosure summarizes the various requirements associated with the positions of Operations Manager and Operations Superintendent. This information is provided to aid in the understanding of the requirements and the relationship of the requirements to the various TVA, NRC, and industry documents.

III. Environmental Consideration

Since this proposed change is administrative in nature and does not involve a significant hazards consideration, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

**Requirements Related to Operations Manager
and Operations Superintendent Positions**

POSITION	FSAR (Section 13.1.3)	Current Technical Specifications	Standard Technical Specifications	TVA-NQA-PLN89 (Appendix B)	NRC REGULATORY GUIDE 1.8 (Section C.2)	TVA-NPOD89-A Organizational Topical Report	ANSI N18.1-1971
OPERATIONS MANAGER	Equates Operations Manager to ANSI N18.1-1971 Position Title of Plant Managers	The Operations Manager shall hold or have held an SRO license on a similar unit. Either the Operations Manager or Operations Superintendent shall have a valid SRO license on this unit.	The [Operations Manager or Assistant Operations Manager] shall hold an SRO license.	Conforms to Reg Guide 1.8 which: 1. Endorses ANSI N18.1-1971 (Appendix B, Item 1) 2. TVA uses the methodology for equating education and experience contained in ANSI 3.1-1987 for guidance to evaluate equivalent related experience for a degree. (Appendix B, Item 4)	Endorses ANSI N18.1-1971 and ANS-3.1-1981.	Does not stipulate that an SRO License is required.	(Section 4.2.1 - PLANT MANAGERS) - The Plant Manager shall have acquired the experience and training normally required for examination by the AEC for a Senior Reactor Operator's License whether or not the examination is taken. In an organization which includes one or more persons who are designated as principal alternates for the Plant Manager and who meet the nuclear power plant experience and AEC examination requirements established for the Plant Manager, the requirements of the Plant Manager may be reduced...
OPERATIONS SUPERINTENDENT	Equates Operations Superintendent to ANSI N18.1-1971 Position Title of Operations Manager	Either the Operations Manager or Operations Superintendent shall have a valid SRO license on this unit.	The [Operations Manager or Assistant Operations Manager] shall hold an SRO license.	Conforms to Reg Guide 1.8 which: 1. Endorses ANSI N18.1-1971 (Appendix B, Item 1) 2. TVA uses the methodology for equating education and experience contained in ANSI 3.1-1987 for guidance to evaluate equivalent related experience. for a degree. (Appendix B, Item 4)	Endorses ANSI N18.1-1971 and ANS 3.1-1981.	Does not stipulate that an SRO License is required.	(Section 4.2.2 OPERATIONS MANAGER) - "At the time of initial core loading or appointment to the active position the Operations Manager shall hold a Senior Reactor Operator's License."

ENCLOSURE 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

I. Description of Proposed License Amendment

The proposed amendment revises the Watts Bar Unit 1 TS requirements to delete the first sentence of Section 5.2.2.f which reads, "The Operations Manager shall hold or have held an SRO license on a similar unit." The remaining sentence of this section is being revised to indicate that the Operations Superintendent will hold a valid SRO license for WBN Unit 1. The result of this change will provide TVA with greater flexibility in regard to management development assignments for key plant personnel.

II. Basis for No Significant Hazards Consideration Determination

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed below for the proposed amendment:

- (1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is an administrative change and does not involve any changes in hardware or changes in the methods of equipment operation. The principal reason for the proposed change is that the statement being deleted from the TS is more restrictive than that defined by TVA's commitment to ANSI Standard N18.1-1971 or the STS. In addition, the proposed change aligns the Operations organization with N18.1-1971 as defined in the FSAR, while maintaining the requirement for a manager with direct responsibilities for oversight of site operations to have an SRO license at Watts Bar. Considering these factors, there are no significant hazards as a result of this change.

- (2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The discussion for the first standard, above, addresses this standard.

- (3) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

The discussion for the first standard, above, addresses this standard.

III. Summary

Based on the above, TVA has determined that operation of Watts Bar in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Therefore, operation of Watts Bar in accordance with the proposed amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92.