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SUBJECT: Rev 3 to 870814 application for amend to License DPR-22 re SRO license requirements for mgt & support staff.

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August 31, 1988

10 CFR Part 50, Section 50.90
TAC 66938

Director of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
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MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Revision No. 3 to License Amendment Request Dated August 14, 1987
SRO License Requirements for Management and Support Staff

Reference: 1) Generic Letter 88-06 dated March 22, 1988 entitled, "Removal of Organizational Charts from Technical Specifications Administrative Control Requirements".

The purpose of this letter is to revise our License Amendment Request dated August 14, 1987, as modified in submittals dated January 4, 1988 and February 10, 1988, to include guidance given in Reference (1). Revision 3 is being submitted at the request of the NRC Project Manager for Monticello and replaces in its entirety all earlier submittals.

An amendment application fee is not required by 10 CFR Part 170 for this revision since a fee was included with the original submittal.

Please contact us if you have any questions related to this revision or if additional information is required to support it.

David Musolf
Manager - Nuclear Support Services

c: Regional Administrator III, NRC
Resident Inspector, NRC
NRR Project Manager, NRC
G Charnoff
Minnesota Pollution Control Agency (State Contact)
Attn: Dr J W Ferman

Attachments

Handwritten initials: Aool

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UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

REQUEST FOR AMENDMENT TO
OPERATING LICENSE DPR-22

REVISION 3 to LICENSE AMENDMENT REQUEST DATED AUGUST 14, 1987

Northern States Power Company, a Minnesota corporation, requests authorization for changes to Appendix A of the Monticello Operating License as shown on the attachments labeled Exhibits A, B, and C. Exhibit A describes the proposed changes, describes the reasons for the changes, and contains a significant hazards evaluation. Exhibits B and C are copies of the Monticello Technical Specifications incorporating the proposed changes.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By

David Musolf
David Musolf
Manager-Nuclear Support Services

On this 31st day of August 1988 before me a notary public in and for said County, personally appeared David Musolf, Manager-Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof, and that to the best of his knowledge, information, and belief the statements made in it are true and that it is not interposed for delay.

Marcia K. LaCore

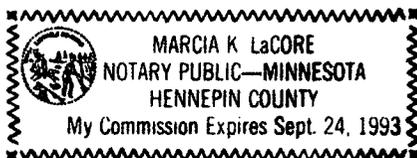


Exhibit A

Monticello Nuclear Generating Plant

Revision 3 to the License Amendment Request dated August 14, 1987

Proposed Changes to the Technical Specifications
Appendix A of Operating License DPR-22

Pursuant to 10 CFR 50, Section 50.59 and and 50.90, the holders of Operating License DPR-22 hereby propose the following changes to Appendix A Technical Specifications:

1. Remove Corporate and Plant Organizational Charts

Proposed Change

Remove the corporate and plant organizational charts, Figures 6.1.1 and 6.1.2, from the Technical Specifications as shown in Exhibit B, pages 232, 234 and 235. Add new Specifications which capture the essential requirements for the organization structure as shown in Exhibit B, page 232 and Insert to page 232.

Delete the figures from page v, "List of Figures", and renumber section 6.1, "Organization", pages 232 through 235.

Reason for Change

Generic Letter 88-06 dated March 22, 1988 entitled, "Removal of Organizational Charts from Technical Specifications Administrative Control Requirements" states, "The staff has determined that with the appropriate changes to these administrative control requirements, the onsite and offsite organizational charts may be removed."

Revision 3 to License Amendment Request dated 8/14/87 deletes the corporate and plant organizational charts from the Technical Specifications, and adds new Specifications that capture the essential aspects of the organization structure. The new Specifications are modeled after the "Markup of Westinghouse Standard Technical Specifications", Enclosure 2 to Generic Letter 88-06.

Safety Evaluation and Determination of Significant Hazards Considerations

The proposed changes to the Operating License have been evaluated to determine whether they constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The NRC staff has found that the replacement of organizational charts with appropriate administrative control requirements of

Generic Letter 88-06 is a desirable administrative change. The Monticello proposed Technical Specifications were modeled after Enclosure 2 to Generic Letter 88-06. Therefore, the proposed changes are in conformance with NRC Staff requirements. These administrative changes have no effect on the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed administrative changes to the Technical Specifications cannot create the possibility of a new or different kind of accident from any accident previously analyzed.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed Technical Specification administrative changes cannot affect any margin of safety.

The Commission has provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists by providing certain examples of amendments that will likely be found to involve no significant hazards considerations. The changes to the Monticello Technical Specifications proposed in this amendment request are representative of NRC example (i) because they involve administrative changes to the Technical Specifications. Based on this guidance and the reasons discussed above, we have concluded that the proposed changes do not involve a significant hazards determination.

2. Requirements for Senior Reactor Operator Licenses

Proposed Changes

Add new Specifications 6.1.C.7 and 6.1.C.8 and revise Specification 6.1.D to:

a) delete the Licensed Senior Operator requirement for the General Superintendent Engineering and Radiation Protection.

b) change the Licensed Senior Operator requirement to a formerly Licensed Senior Operator requirement for the General Superintendent of Operations, and add the following to 6.1.D:

...and (3) the General Superintendent of Operations who shall meet the requirements of ANSI N18.1-1971, except that NRC license requirements are as specified in Specification 6.1.C.7.

c) add the requirement for at least one member of plant management holding a current Senior Reactor Operator License to be assigned to the plant operations group on a long term basis. This individual will not be assigned to a rotating shift.

d) revise Specification 6.5.G to read, "...may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Reactor Operator's License."

Refer to Exhibit B, pages 232, Insert to page 232, and 246b.

Reason for Changes

These changes would revise the Technical Specifications to change the requirements for Senior Reactor Operator (SRO) Licenses for plant management. We believe these changes are consistent with the requirements of Generic Letter 88-06, Enclosure 2, and the intent of ANSI N18.1-1971.

a & b) In the past, Northern States Power Company (NSP) has encouraged plant management and technical support personnel to obtain and maintain current SRO licenses. Recent changes to 10 CFR Part 55, and related NRC Staff guidance, have significantly upgraded SRO requalification program requirements. While these changes will provide added assurance that all licensed personnel are competent in control room operations, the amount of time and effort required to maintain a current SRO license has become prohibited for plant management and support personnel not directly involved in operations.

NSP will provide alternative training for plant management and support personnel in lieu of maintaining an SRO license and participating in license requalification training. This Program will maintain a high level of knowledge of nuclear fundamentals, reactor theory, and plant operations in management and support personnel. Most plant management and support personnel not directly involved in operations will participate in this program in lieu of maintaining a current NRC SRO license. Most utilities operating nuclear generating facilities have similar programs.

The changes we have proposed would revise the SRO requirements for management personnel specified in the Monticello Technical Specifications to be equivalent to the SRO requirements specified in the Standard Technical Specifications, NUREG-0123. This would reduce the number of SRO licenses required for management personnel.

b & c) The proposed change in license requirements for the General Superintendent Operations is consistent with the requirements of the latest (1987) version of ANSI/ANS-3.1. The new standard does not require that the plant operation manager hold a current license if a current license is held by an operations middle manager.

d) The proposed change revises the SRO license requirements for management personnel who may authorize temporary procedure changes. This change is also consistent with the NRC Standard Technical Specifications.

Safety Evaluation and Determination of Significant Hazards Considerations

The proposed changes to the Operating License have been evaluated to determine whether they constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed Technical Specifications changes eliminate unnecessary requirements for licensing of plant management personnel. They would also revise the approvals needed for temporary procedure changes from two licensed members of management to one licensed member of management and one unlicensed member of management. License requirements for plant operations staff, including the Site Superintendents and Shift Supervisors (both are SRO licensed management personnel), would not change. Because there are no changes being proposed in the license requirements for individuals controlling the reactor and other plant systems, there will be no impact on the quality of plant operations. The proposed changes cannot, therefore, result in a degradation in the quality of plant operations which would increase the probability of an accident.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed Technical Specifications changes relate to the requirements for plant management personnel to hold active SRO licenses. No changes are proposed in the license requirements for personnel actually operating the reactor and other plant systems or shift management. The changes, therefore, cannot result in a degradation in the quality of plant operation or increase the probability of operator error resulting in a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed Technical Specification wording changes do not, for the reasons stated above, affect the quality of plant operations. Therefore, there can be no impact on any existing margin of safety.

The Commission has provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists by providing certain examples of amendments that will likely be found to involve no significant hazards considerations. The changes to the Monticello Technical Specifications proposed in this amendment request are representative of NRC example (i) because they involve administrative changes to the Technical Specifications. Based on this guidance and the reasons discussed above, we have concluded that the proposed changes do not involve a significant hazards determination.

Exhibit B

Revision 3 to the License Amendment Request dated August 14, 1987

Docket No. 50-263
License No. DPR-22

Exhibit B consists of marked up pages for the Monticello Nuclear Generating Plant Technical Specifications showing the proposed changes as listed below:

Page

v
232
Insert for Page 232
233
233a
234
235
246b

Revision 3 8/31/88