



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 68 TO PROVISIONAL OPERATING LICENSE NO. DPR-13,  
AMENDMENT NO. 57 TO FACILITY OPERATING LICENSE NO. NPF-10, AND  
AMENDMENT NO. 110 TO FACILITY OPERATING LICENESE NO. NPF-15  
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL  
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS NO. 1, 2 AND 3  
DOCKET NOS. 50-206, 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated September 13, 1988, Southern California Edison Company (SCE or the licensee) requested changes to the Technical Specifications appended to Provisional Operating License No. DPR-13 for operation of San Onofre Nuclear Generating Station (SONGS), Unit No. 1, Facility Operating License No. NPF-10 for operation of SONGS Unit No. 2, and Facility Operating License No. NPF-15 for operation of SONGS Unit No. 3 in San Diego County, California. The proposed changes would delete both the onsite and offsite organization charts and revise the reporting requirement for the offsite Nuclear Safety Group for all three units, and would revise the reporting requirement for the Independent Safety Engineering Group for Units 2 and 3.

2.0 EVALUATION

The proposal to remove the organization charts from the Technical Specifications is consistent with the staff recommendation in the Generic Letter 88-06. In the generic letter the staff examined the regulatory requirements of 10 CFR 50.36 for the administrative controls to be included in Technical Specifications. The 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 included elsewhere in the Technical Specification 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 Technical Specifications, as are the requirements for minimum staffing under various operating conditions. The organizational management functions for independent reviews and audits, unit review, independent safety engineering groups, and shift technical advisors are also specified in other Technical Specifications.

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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 identify those organizational characteristics that are important to safety. The staff finds that the only aspects of organization charts that are important to safety and not covered by other specifications (thus must remain in the Technical Specifications) are those conditions listed below:

- (1) 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 function of health physics, quality assurance and training of the operating staff.

Since the proposed amendments included the above conditions in the Technical Specifications, removal of the organization charts represents no reduction in current safety requirements. These changes will simply allow the licensee to implement changes in its organization structure without obtaining NRC approval. The revisions to the reporting requirements for the Nuclear Safety Group (for all three units) and for the Independent Safety Engineering Group (for Units 2 and 3) are consistent with this goal to allow flexibility, and are also acceptable.

The proposed amendments require that the licensee must ensure that the organizational information described in (1) above is incorporated in the Final Safety Analysis Report.

The qualifications for certain positions are currently designated by organization charts as requiring a SRO or RO license. These requirements are added to the Technical Specifications by the amendments.

### 3.0 ENVIRONMENTAL CONSIDERATION

The amendments involve changes to administrative procedures and reporting requirements. Accordingly, the 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 the amendments.

### 4.0 BASIS FOR EXPEDITED ACTION

The licensee stated that the changes in its organization which necessitate the amendments are scheduled to be placed in effect on October 3, 1988 and requested that NRC review the proposed changes on an exigent basis. Most of the changes in the licensee's organization affect the off-site organization and design functions and as such have minimal impact on the Technical Specifications. Nevertheless, Technical Specification changes are needed in order to place the reorganization plan into effect. The amendment request conforms to the NRC guidance contained in Generic Letter 88-06 which stated that such amendments would be reviewed and approved quickly. In consideration of this, the minimal safety significance of the amendments, and the fact that undue delay of an announced reorganization would be needlessly disruptive, the NRC staff has decided to expedite its issuance as requested by the licensee.

### 5.0 NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission made a proposed determination that the amendments involve no significant hazards consideration which was published in the Federal Register (53 FR 36681) on September 15, 1988. The staff consulted with the State of California. No public comments were received, and the State of California did not have any comments. Because the proposed amendments involve only administrative matters (organizational charts and reporting) as described above, the proposed amendments do not involve changes in the probability or consequences of accidents previously evaluated or create the possibility of a new or different kind of accident or involve a significant reduction in a margin of safety. Therefore, we have concluded that the proposed amendments do not involve a significant hazards consideration.

6.0 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 the 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: October 18, 1988