



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

May 7, 1981

Docket No. 50-206  
LS05-81-05-007

Mr. R. Dietch, Vice President  
Nuclear Engineering and Operations  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770

Dear Mr. Dietch:

SUBJECT: ORGANIZATIONAL STRUCTURE

The Commission has issued the enclosed Amendment No. 54 to Provisional Operating License No. DPR-13 for the San Onofre Nuclear Generating Station (SONGS), Unit 1. The amendment consists of changes to the Technical Specifications in response to your requests dated August 27, 1980, and February 2, 1981.

The amendment revises certain provisions in Sections 6 and 5 (Administrative Controls) of Appendices A and B, respectively, to reflect changes in the corporate organizational structure and changes in the Nuclear Audit and Review Committee (NARC) and in the Onsite Review Committee (OSRC).

As a result of discussions with members of your staff several changes have been made to your submittals. These changes include (1) the Senior Vice President and Vice President (Fuel Supply) report to the Chairman of the Board rather than the President as shown in Figure 6.2.2.1, (2) the Supervisory Engineer and Engineers shown in Figures 6.2.2.2 and 5.2.2 are designated for the site rather than for Unit 1, (3) the Plant Manager was not renamed Station Manager on Figures 6.2.1.1 and 5.2.1 as shown on all the other figures, and (4) all station personnel required to be qualified per ANSI 18.1 were added to Figures 6.2.2.2 and 5.2.2 including I&C Foreman and Technicians, Chemistry Foreman and Technicians, Health Physics Foreman and Technicians, Radwaste Technicians, and Dosimetry Foreman.

The basis for the proposed change is to implement a station organization consistent with the requirements and needs of a three-unit nuclear station. In the proposed organization, responsibility for each major aspect associated with running the station would rest with an individual reporting to the Station Manager. This should provide consistent policy and management in each major area at all three units and facilitate communication between the three units' organizations. Training has been removed from the Station Manager's duties and would now report to the Manager of Nuclear Operations and act as a service organization to the Station Manager for training of Station personnel.

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The responsibility for health physics and regulatory aspects of radwaste disposal would be placed with a separate group. Health Physics and Chemistry have been organizationally separated to allow an individual to specialize in one area of expertise.

In the course of our review of the application for an operating license for SONGS 2 and 3, we have evaluated the proposed corporate and plant staff organizations, which are essentially the same as those that the Technical Specification change would put into effect for Unit 1. As part of that review we have discussed the organization with Southern California Edison Company management, have reviewed the organization charts and the jurisdiction statements that establish the functions and responsibilities of each part of the organization, and have also reviewed the resumes of individuals who will be filling the key positions.

We have evaluated the proposed SONGS 2 and 3 organization against the applicable Regulatory Positions of Revision 2 of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)", and against the applicable draft guidelines of NUREG-0731 "Guidelines for Utility Management Structure and Technical Resources". Based on our evaluation of the proposed SONGS 1, 2 and 3 organizations we find that the changes proposed for SONGS Unit 1 do not reduce the effectiveness for the management or safe operation of SONGS Unit 1.

In the restructured organization, the health physics section and the chemistry section have been separated into two distinct sections, as recommended by NUREG-0731. The Health Physics Manager reports at the same level as the Assistant Station Manager for Operations and will report directly to the Station Manager as per NUREG-0731. This link with the Station Manager will give the Health Physics Manager a direct channel of communication with responsible management, a recommendation made in Regulatory Guide 8.8, "Information Relevant to Ensuring That Occupational Radiation Exposure at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable" and in NUREG-0731.

The Health Physics Manager is a member of the OSRC at SONGS 1. As a member of the OSRC, he participates in the review of: 1) all procedures affecting nuclear safety; 2) changes to the Technical Specifications; and 3) facility operations to detect potential safety hazards, and is kept informed on all matters involving nuclear safety. The position of the Health Physics Manager in the SONGS 1 organizational chain is acceptable and complies with the guidelines of NUREG-0731 and Regulatory Guide 8.8.

The Technical Specifications for SONGS 1 state that each member of the facility staff meet or exceed the minimum qualifications of ANSI N18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants". Although Health Physics technicians at SONGS 1 are part of the facility staff and must meet the minimum ANSI qualifications, they were not shown on the proposed facility

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organization chart (Figure 6.2.2.2 and 5.2.2). As a result of our discussion with your staff, all Station personnel required to be qualified per ANSI 18.1 were included on Figures 6.2.2.2 and 5.2.2.


The guidance used by us in determining acceptability of the plant organization is contained in Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)", the applicable draft guidelines of NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources" and Regulatory Guide 8.8, "Information Relevant to Ensuring That Occupational Radiation Exposure at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable". The proposed organizational changes conform with the Regulatory Guide criteria. We have concluded that all of the above changes are administrative in nature, do not reduce the effectiveness for the management or safe operation of San Onofre, Unit 1, and are, therefore, acceptable.

The amendment applies to the organizational structure and, therefore, does not authorize a change in effluent types or total amounts nor an increase in power level, and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR §51.5(d)(4) that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Since the amendment applies to the organizational structure, it does not involve any significant new safety information of a type not considered by a previous Commission safety review of the facility. It does not involve a significant increase in the probability or consequences of an accident, does not involve a significant decrease in a safety margin and, therefore, does not involve a significant hazards consideration. We have also concluded that there is reasonable assurance that the health and safety of the public will not be endangered by this action and that the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

A copy of the related Notice of Issuance is also enclosed.

Sincerely,

  
Dennis M. Crutchfield, Chief  
Operating Reactors Branch #5  
Division of Licensing

Enclosures:

1. Amendment No. 54 to License No. DPR-13
2. Notice

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cc w/enclosures:

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