



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 66 TO PROVISIONAL OPERATING LICENSE NO. DPR-13

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS & ELECTRIC COMPANY

SAN ONOFRE UNIT NO. 1

DOCKET NO. 50-206

ADMINISTRATIVE CONTROLS

1.0 INTRODUCTION

By letter dated December 18, 1981, as modified by letter dated August 5, 1982, Southern California Edison Company (the licensee) proposed changes to the Technical Specifications for San Onofre Nuclear Generating Station, Unit No. 1. These changes would modify the Administrative Controls sections of the Appendix A, Technical Specifications and Bases, and Appendix B, Environmental Technical Specifications, appended to Provisional Operating License DPR-13.

2.0 DISCUSSION AND EVALUATION

The licensee's proposed changes to the Appendix A and Appendix B Technical Specifications would incorporate station organization changes and position titles for San Onofre Unit No. 1. The NRC staff's evaluation of each proposed change is given below.

2.1 Proposed Change A.1

Change Technical Specification 6.1.1 to reflect a title change of the Plant Manager.

2.1.1 Evaluation

The proposed change to Technical Specification 6.1.1 reflects merely a change in position title from "Plant Manager" to "Station Manager." There is no safety significance to this change. Therefore, this change is acceptable.

2.2 Proposed Change A.2

Change Figures 6.2.1.1 and 6.2.2.2 to reflect current organization position titles. This proposed change also established the new position of Deputy Station Manager (DSM).

2.2.1 Evaluation

The proposed change establishes the new position of Deputy Station Manager (DSM). The DSM reports to the Station Manager and is responsible for Material and Administrative Services, Station Security, Compliance/Configuration Control, and Station Emergency Preparedness, which latter includes Fire Protection. The licensee has stated, in its December 18, 1981 letter, that the DSM "will assume responsibility for activities not directly related to operation of the reactors. Assumption of these duties by the Deputy Station Manager will enable the Station Manager to increase his attention to activities directly related to operation of the reactors." We concur with the philosophy of relieving the Station Manager of administrative and non-operational responsibilities, and find the proposed Figures 6.2.1.1 and 6.2.2.2 properly express the relationship of the station operating departments to the DSM. Therefore, this change is acceptable.

The other changes included the addition of a Manager of Nuclear Licensing who reports to the Manager of Nuclear Engineering, Safety and Licensing and title changes to reflect revised onsite organization position titles. The addition of the Manager of Nuclear Licensing brings the Unit 1 Technical Specifications into consistency with those for Units 2 and 3. There is no safety significance in the position title changes. Therefore, these changes are acceptable.

2.3 Proposed Change A.3

The proposed change would delete Specification 6.2.3 and Figure 6.2.3.1 which define the current fire protection staff and line organizations.

2.3.1 Evaluation

Proposed change A.2, discussed above, assigns responsibility for fire protection to the Manager, Station Emergency Preparedness. This proposed change, shown on proposed Figure 6.2.2.2, provides acceptable delineation of responsibility for the fire protection program. Therefore, the deletion of Specification 6.2.3 and Figure 6.2.3.1 is acceptable.

2.4 Proposed Change A.4.

The proposed change would modify the title of the Health Physics Manager to conform with the station position title.

2.4.1 Evaluation

This proposed change reflects the revised title, Manager, Health Physics. It adds the title of ANSI N18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants." Neither of these changes has any safety significance. Therefore, they are acceptable.

2.5 Proposed Change A.5

The proposed change would reflect changes in position titles in Specification 6.5.1.2 and add the Deputy Station Manager as a member of the Onsite Review Committee (OSRC). Specification 6.5.1.12 would include a verification that proposed actions described in Specifications 6.5.1.9, 6.5.1.10, and 6.5.1.11 do not constitute an unreviewed safety question.

2.5.1 Evaluation

The proposed change to Technical Specification 6.5.1.2 includes changes in position titles of the members of the Onsite Review Committee (OSRC) and adds the Deputy Station Manager as a member of the OSRC. The addition of the DSM is acceptable because of the responsibility assigned to this new position and it also is consistent with the OSRC composition given in Section 6.5.1.2 of the Technical Specifications for Unit 2. The title changes have no safety significance; therefore, they are acceptable.

The inclusion in Specification 6.5.1.12 of a verification that proposed procedure changes, Technical Specification changes, and modifications to the facility will not involve an unreviewed safety question assures that station supervisory staff will be responsible for this determination. Therefore, this change is acceptable.

2.6 Proposed Change A.6

The proposed change reflects changes in the position titles and adds titles of managers who can be delegated procedure review and approval responsibility by the Station Manager.

2.6.1 Evaluation

The position title changes have no safety significance. Therefore, they are acceptable. The addition of managers who can be delegated procedure review and approval responsibility by the Station Manager is consistent with the assigned areas of expertise. The permitted delegation still assures that actions are taken by appropriate management personnel and continues to assure that plant safety will be maintained. Therefore, this change is acceptable.

2.7 Proposed Change B.1

This change would replace Figures 5.2-1 and 5.2-2 in Appendix B with figures showing the updated organization positional titles.

2.7.1 Evaluation

The updated figures are identical to Figures 6.2.1.1 and 6.2.2.2 discussed under Proposed Change A.2, above. For the reasons stated above, these changes are acceptable.

2.8 Proposed Change B.2

This change would reflect changes in position titles in Specification 5.3.1 of Appendix B and add the Deputy Station Manager as a member of the OSRC. Specification 5.3.1.12 in Appendix B would include a verification that proposed actions described in Specifications 5.3.1.9, 5.3.1.10, and 5.3.1.11 will not significantly alter the environmental impact of the facility.

2.8.1 Evaluation

The change in position titles and the addition of the Deputy Station Manager as a member of OSRC is acceptable for the reasons stated in the evaluation of Proposed Change A.5, above. The inclusion in Section 5.3.1.12 of a verification that proposed actions will not significantly alter the environmental impact of the facility assures that station supervisory personnel will be responsible for this determination. Therefore, this change is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

We have determined that the amendment 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.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration; (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ACKNOWLEDGEMENT

R. Benedict and W. Paulson contributed to this evaluation.

Dated: December 28, 1982