

**Advanced Passive 1000 (AP1000)
Generic Technical Specification Traveler (GTST)**

Title: Changes related to Section 5.1, Responsibility

I. Technical Specifications Task Force (TSTF) Travelers, Approved Since Revision 2 of STS NUREG-1431, and Used to Develop this GTST

TSTF Number and Title:

TSTF-65-A, Rev.1: Use of generic titles for utility positions (Note: This TSTF applies to STS NUREG-1431 Rev. 1 - see comment in Section IV of this GTST)

STS NUREGs Affected:

TSTF-65-A, Rev.1: NUREG-1430, -1431, -1432, -1433, -1434

NRC Approval Date:

TSTF-65-A, Rev.1: 02-Dec-97

TSTF Classification:

TSTF-65-A, Rev.1: Improve Specifications

II. Reference Combined License (RCOL) Standard Departures (Std. Dep.), RCOL COL Items, and RCOL Plant-Specific Technical Specifications (PTS) Changes Used to Develop this GTST

RCOL Std. Dep. Number and Title:

None

RCOL COL Item Number and Title:

VEGP COL Application, Rev. 3 (Ref. 2):

Bracketed site-specific information in GTS Subsection 5.1, Responsibility

COL Item 5.1.1, regarding the position title “[Plant Manager]”

COL Item 5.1.2, regarding the position title “[Shift Supervisor (SS)]”

RCOL PTS Change Number and Title:

None

III. Comments on Relations Among TSTFs, RCOL Std. Dep., RCOL COL Items, and RCOL PTS Changes

This section discusses changes: (1) that were applicable to previous designs, but are not to the current design; (2) that are already incorporated in the GTS; and (3) that are superseded by another change.

TSTF-65-A, Rev. 1 made changes to WOG STS 5.1.1, Rev. 1, by removing the brackets from the position title “[Plant Manager]” and changing the title to lower case; this change was already included in Rev. 0 of the VEGP PTS Subsection 5.1.1.

IV. Additional Changes Proposed as Part of this GTST (modifications proposed by NRC staff and/or clear editorial changes or deviations identified by preparer of GTST)

None

V. Applicability

Affected Generic Technical Specifications and Bases:

Section 5.1: Responsibility

Changes to the Generic Technical Specifications and Bases:

TSTF-65-A, Rev. 1 made changes to WOG STS 5.1, Rev. 1. It added a "REVIEWER'S NOTE" at the beginning of STS 5.1 detailing the use of generic titles and title changes. It also removed the brackets around the title "Plant Manager" and used lower case letters in WOG STS 5.1.1. AP1000 STS Subsection 5.1.1, Rev. 0, will include these changes, to be consistent with TSTF-65-A and NUREG-1431, Rev. 4.

COL Item 5.1.1, regarding the position title "[Plant Manager]" was completed in the VEGP PTS, Rev. 0, by removing the brackets and changing the title to lower case; this is the same as the change made by TSTF-65-A, Rev. 1.

COL Item 5.1.2, regarding the position title "[Shift Supervisor (SS)]" was completed in the VEGP PTS by removing the brackets and changing the title of the unit operator with control room command function responsibility to "senior reactor operator (SRO)." This change is plant-specific. To maintain consistency with TSTF-65-A, Rev. 1 and WOG STS 5.1.2, Rev. 4, AP1000 STS 5.1.2, Rev. 0, retains the bracketed position title "[Shift Supervisor (SS)]."

VI. Traveler Information

Description of TSTF changes:

TSTF-65-A, Rev.1 changes WOG STS Rev. 1 by inserting a "REVIEWER'S NOTE" at the beginning of Section 5.1 regarding the titles for members of a unit's operation staff. It also replaces the bracketed titles with generic titles for staff positions in WOG STS Rev. 1 paragraph 5.1.1. Specifically, TSTF-65-A, Rev.1 changes the bracketed title from "[Plant Superintendent]" to "plant manager" in both paragraphs of WOG STS 5.1.1, Rev. 1. These changes are included in the WOG STS 5.1, Rev. 4.

AP1000 GTS 5.1 does not include these changes. This GTST will implement these changes in AP1000 STS 5.1, Rev. 0.

Rationale for TSTF changes:

According to TSTF-65-A, Rev.1, the change of the title "[Plant Superintendent]" to "plant manager," allows the use of generic personnel titles as provided by ANSI/ANS 3.1. This change does not eliminate any of the specifications, responsibilities, or requirements for these positions, since the plant-specific personnel titles are currently identified in licensee controlled documents such as the Final Safety Analysis Report (FSAR) or the Quality Assurance (QA) plan. In addition, the "REVIEWER'S NOTE" is placed at the beginning of STS 5.1 to describe the use of the generic titles and title changes.

Description of changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

COL Item 5.1.1, regarding the position title "[Plant Manager]" was completed in the VEGP PTS, Rev. 0, by removing the brackets and changing the title to lower case; this is the same as the change made by TSTF-65-A, Rev. 1.

COL Item 5.1.2, regarding the position title "[Shift Supervisor (SS)]" was completed in the VEGP PTS by removing the brackets and changing the title of the unit operator with control room command function responsibility to "senior reactor operator (SRO)." This change is plant-specific. To maintain consistency with TSTF-65-A, Rev. 1 and WOG STS 5.1.2, Rev. 4, AP1000 STS 5.1.2, Rev. 0, retains the bracketed position title "[Shift Supervisor (SS)]."

Rationale for changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

According to the VEGP COL application discussion given for COL Item 5.1.1, "Generic titles are used consistent with the FSAR organization description in FSAR Section 13.1 and with WOG STS Revision 3.1." Use of generic titles is also consistent with Revision 4 of the WOG STS 5.1.1.

The VEGP COL application also justifies COL item 5.1.2, by stating, "Generic titles are used consistent with the FSAR organization description in FSAR Section 13.1." However, the title given for the plant operator with control room command function responsibility is plant-specific, which is why a typical title is in stated in brackets in TSTF-65-A, Rev. 1 and WOG STS 5.1.2, Rev. 4. Therefore AP1000 STS 5.1.2, Rev. 0, retains the bracketed position title "[Shift Supervisor (SS)]."

Description of additional changes proposed by NRC staff/preparer of GTST:

This GTST will include the "REVIEWER'S NOTE" at the beginning of Section 5.1 regarding the titles for members of a unit's operation staff.

Rationale for additional changes proposed by NRC staff/preparer of GTST:

The insertion of the "REVIEWER'S NOTE" at the beginning of AP1000 GTS 5.1, Rev. 19 is consistent with the text in TSTF-65-A, Rev. 1 and WOG STS 5.1, Rev. 4. According to TSTF-65-A, Rev. 1, the insertion of the "REVIEWER'S NOTE" explains the use of the generic titles and title changes.

VII. GTST Safety Evaluation

Technical Analysis:

According to TSTF-65-A, Rev. 1, the changes made by this GTST improve the Technical Specifications. The changes of the titles, in paragraph 5.1.1 of the AP1000 GTS Rev. 19, allow the use of generic personnel titles - as provided by ANSI/ANS 3.1. In addition, the insertion of the "REVIEWER'S NOTE" at the beginning of Section 5.1 explains the use of the generic titles and title changes.

These changes do not affect the technical content, but improve the readability, implementation, and understanding of the requirements, and are therefore acceptable.

References to Previous NRC Safety Evaluation Reports (SERs):

None

VIII. Review Information

Evaluator Comments:

This GTST includes the "REVIEWER'S NOTE at the beginning of Section 5.1 to describe the use of the generic titles and title changes. This is consistent with TSTF-65-A, Rev. 1 and revisions 2 through 4 of the WOG STS 5.1.

E. Danial Doss
Argonne National Laboratory
630-252-5967
doss@anl.gov

Review Information:

Availability for public review and comment on Revision 0 of this traveler approved by NRC staff on Monday, May 21, 2014.

NRC Final Approval Date:

NRC Contact:

C. Craig Harbuck
U.S. Nuclear Regulatory Commission
301-415-3140
Craig.Harbuck@nrc.gov

IX. Evaluator Comments for Consideration in Finalizing Technical Specifications and Bases

Please note that the "REVIEWER'S NOTES" in Section 5.1 "Responsibility," are intended to precede the paragraph numbered as 5.1.1.

X. References Used in GTST

1. AP1000 DCD, Revision 19, Section 16, "Technical Specifications," June 2011 (ML11171A500).
2. Vogtle Electric Generating Plant (VEGP) Units 3 and 4 - Final Safety Evaluation Report (ML110450302, 08/10/2011)
3. Vogtle Electric Generating Plant (VEGP), Units 3 & 4 COL Application, Part 4, Technical Specifications, Revision 3 (ML11180A102, 07/01/2011).
4. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Unit 3 and 4, Technical Specifications Upgrade License Amendment Request, February 24, 2011 (ML12065A057).
5. RAI Letter No. 01 Related to License Amendment Request (LAR) 12-002 for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses, September 07, 2012 (ML12251A355).
6. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Response to Request for Additional Information Letter No. 01 Related to License Amendment Request LAR-12-002, ND-12-2015, October 04, 2012 (ML12286A363 and ML12286A360)
7. NRC Safety Evaluation (SE) for Amendment No. 13 to Combined License (COL) No. NPF- 91 for Vogtle Electric Generating Plant (VEGP) Unit 3, and Amendment No. 13 to COL No. NPF-92 for VEGP Unit 4, September 9, 2013 (ADAMS Package Accession No. ML13238A337), which contains:

ML13238A355 Cover Letter - Issuance of License Amendment No. 13 for Vogtle Units 3 and 4 (LAR 12-002).

ML13238A359 Enclosure 1 - Amendment No. 13 to COL No. NPF-91

ML13239A256 Enclosure 2 - Amendment No. 13 to COL No. NPF-92

ML13239A284 Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13)

ML13239A287 Enclosure 4 - Safety Evaluation (SE), and Attachment 1 - Acronyms

ML13239A288 SE Attachment 2 - Table A - Administrative Changes

ML13239A319 SE Attachment 3 - Table M - More Restrictive Changes

ML13239A333 SE Attachment 4 - Table R - Relocated Specifications

ML13239A331 SE Attachment 5 - Table D - Detail Removed Changes

ML13239A316 SE Attachment 6 - Table L - Less Restrictive Changes

The following documents were subsequently issued to correct an administrative error in Enclosure 3:

ML13277A616 Letter - Correction To The Attachment (Replacement Pages) - Vogtle Electric Generating Plant Units 3 and 4- Issuance of Amendment Re: Technical Specifications Upgrade (LAR 12-002) (TAC No. RP9402)

ML13277A637 Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13) (corrected)

XI. MARKUP of the Applicable GTS Section for Preparation of the STS NUREG

The entire section of the Specifications and the Bases associated with this GTST is presented next.

Changes to the Specifications and Bases are denoted as follows: Deleted portions are marked in strikethrough red font, and inserted portions in bold blue font.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

-----REVIEWER'S NOTES-----

1. Titles for members of the unit staff shall be specified by use of an overall statement referencing an ANSI Standard acceptable to the NRC staff from which the titles were obtained, or an alternative title may be designated for this position. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special titles because of unique organizational structures.
2. The ANSI Standard shall be the same ANSI Standard referenced in Section 5.3, Unit Staff Qualifications. If alternative titles are used, all requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Unit staff titles shall be specified in the Final Safety Analysis Report or Quality Assurance Plan. Unit staff titles shall be maintained and revised using those procedures approved for modifying/revising the Final Safety Analysis Report or Quality Assurance Plan.

- 5.1.1 The {Pplant Mmanager} shall be responsible for overall unit operations and shall delegate in writing the succession to this responsibility during his absence.
- The {Pplant Mmanager} or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.
- 5.1.2 The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

XII. Applicable STS Subsection After Incorporation of this GTST's Modifications

The entire subsection of the Specifications and the Bases associated with this GTST, following incorporation of the modifications, is presented next.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

-----REVIEWER'S NOTES-----

1. Titles for members of the unit staff shall be specified by use of an overall statement referencing an ANSI Standard acceptable to the NRC staff from which the titles were obtained, or an alternative title may be designated for this position. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special titles because of unique organizational structures.
2. The ANSI Standard shall be the same ANSI Standard referenced in Section 5.3, Unit Staff Qualifications. If alternative titles are used, all requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Unit staff titles shall be specified in the Final Safety Analysis Report or Quality Assurance Plan. Unit staff titles shall be maintained and revised using those procedures approved for modifying/revising the Final Safety Analysis Report or Quality Assurance Plan.

- 5.1.1 The plant manager shall be responsible for overall unit operations and shall delegate in writing the succession to this responsibility during his absence.
- The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.
- 5.1.2 The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.