

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION REVISION

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6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, AND AUDIT

6.1.1 Organization

- 6.1.1.1 The Station Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.1.2 In all matters pertaining to actual operation and maintenance and to these Technical Specifications, the Station Manager shall report to and be directly responsible to the Vice President, Nuclear Production Department, through the General Manager, Nuclear Stations. The organization is shown in Figure 6.1-2.
- 6.1.1.3 The station organization for Operations, Technical Services and Maintenance shall be functionally as shown in Figure 6.1-1. Minimum operating shift requirements are specified in Table 6.1-1.
- 6.1.1.4 Incorporated in the staff of the station shall be personnel meeting the minimum requirements encompassing the training and experience described in Section 4 of ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel" except for the Site Health Physicist, the Superintendent of Operations and the Operating Engineer.

The Site Health Physicist shall have a bachelor's degree in a science or engineering subject or the equivalent in experience, including some formal training in radiation protection, and shall have at least five years of professional experience in applied radiation protection of which three years shall be in applied radiation protection work in one of Duke Power Company's nuclear stations.

A qualified individual who does not meet the above requirements, but who has demonstrated the required radiation protection management capabilities and professional experience in applied radiation protection work at one of Duke Power Company's multi-unit nuclear stations, may be appointed to the position of Site Health Physicist by the Station Manager, based on the recommendations of the System Health Physicist and as approved by the General Manager, Nuclear Stations.

The Superintendent of Operations shall have a minimum of eight years of responsible nuclear or fossil station experience, of which a minimum of three years shall be nuclear station experience. A maximum of two years of the remaining five years of experience may be fulfilled by academic training, or related technical training, on a one-for-one time basis. The Superintendent of Operations shall hold or have held a Senior Reactor Operator License or a Senior Reactor Operator Certification.

The Operating Engineer shall have a minimum of eight years of responsible nuclear or fossil station experience, of which a minimum of three years shall be nuclear station experience. A maximum of two

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TECHNICAL JUSTIFICATION

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TECHNICAL JUSTIFICATION

The attached proposal consist of a revision to the requirements for holding the Superintendent of Operations position at Oconee. The requirements are specified in Section 6.1.1.4 in the Administrative Controls/Organization Section. Presently the Superintendent of Operations must hold or have held a Senior Reactor Operator (SRO) License. This revision will expand the requirements so that an SRO Certification will also qualify a candidate for the Superintendent position.

In order to ensure the quality of operations through qualified management, Duke Power has developed an SRO certification program to provide a course of study and experiences similar to that of an SRO during normal and abnormal conditions. The Duke SRO certification program was designed for non-licensed management personnel who are required to have an understanding of plant operations. The certification program training is equivalent to the SRO License training and is administered through completion of an NRC format audit exam which certifies technical competence of trainees. This audit exam consists of a written exam, simulator operation and plant walk through examination. Candidates for certification do not take the NRC License exam since their positions do not require actual operating of the plant.

The SRO Certification program was based on ANSI 3.1 Standards, previous commitments and the NRC approved Cold License Certification program. The SRO License Preparatory Program is an INPO accredited program and is approved by the NRC. Duke Power has defined this program and the SRO Certification Program in the Employee Training and Qualification Manual. It has been determined that the SRO Certification Program meets or exceeds ANSI 3.1 Standards thus providing adequate technical knowledge to qualify management personnel to assume the responsibilities of the Superintendent of Operations.

ATTACHMENT III

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

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NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Technical Specification 6.1.1.4, as proposed, would acknowledge an SRO Certification as an acceptable alternate to an SRO License requirement for the Superintendent of Operations position. 10 CFR 50.92 states that a proposed amendment involves no significant hazards considerations if operation in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated. The details of position requirements is included in the Administrative Controls section of the technical specifications and has no impact on operation of the plant or any accident analysis.

The proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated because the change is purely administrative and attempts to improve the quality of operations through qualified management.

In addition, the proposed amendment would not involve a significant reduction in a margin of safety. Inclusion of the SRO certification will prove to be an acceptable experience alternative and will not lower the quality standards that Duke Power maintains in nuclear station personnel.

Based upon this analysis, Duke Power Company concludes that the proposed amendment does not involve significant hazards considerations.