

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, AND AUDIT

6.1.1 Organization

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

6.1.1.1 Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These 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. These requirements shall be documented in the FSAR.

6.1.1.2 The Station Manager shall be responsible for overall facility safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant and shall delegate in writing the succession to this responsibility during his absence.

6.1.1.3 The Vice President, Nuclear Production Department, shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

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 Station Health Physicist, the Superintendent of Operations and the Operating Engineer.

The Station 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 Station Health Physicist by the Station Manager, based on the recommendations of

Attachment 1

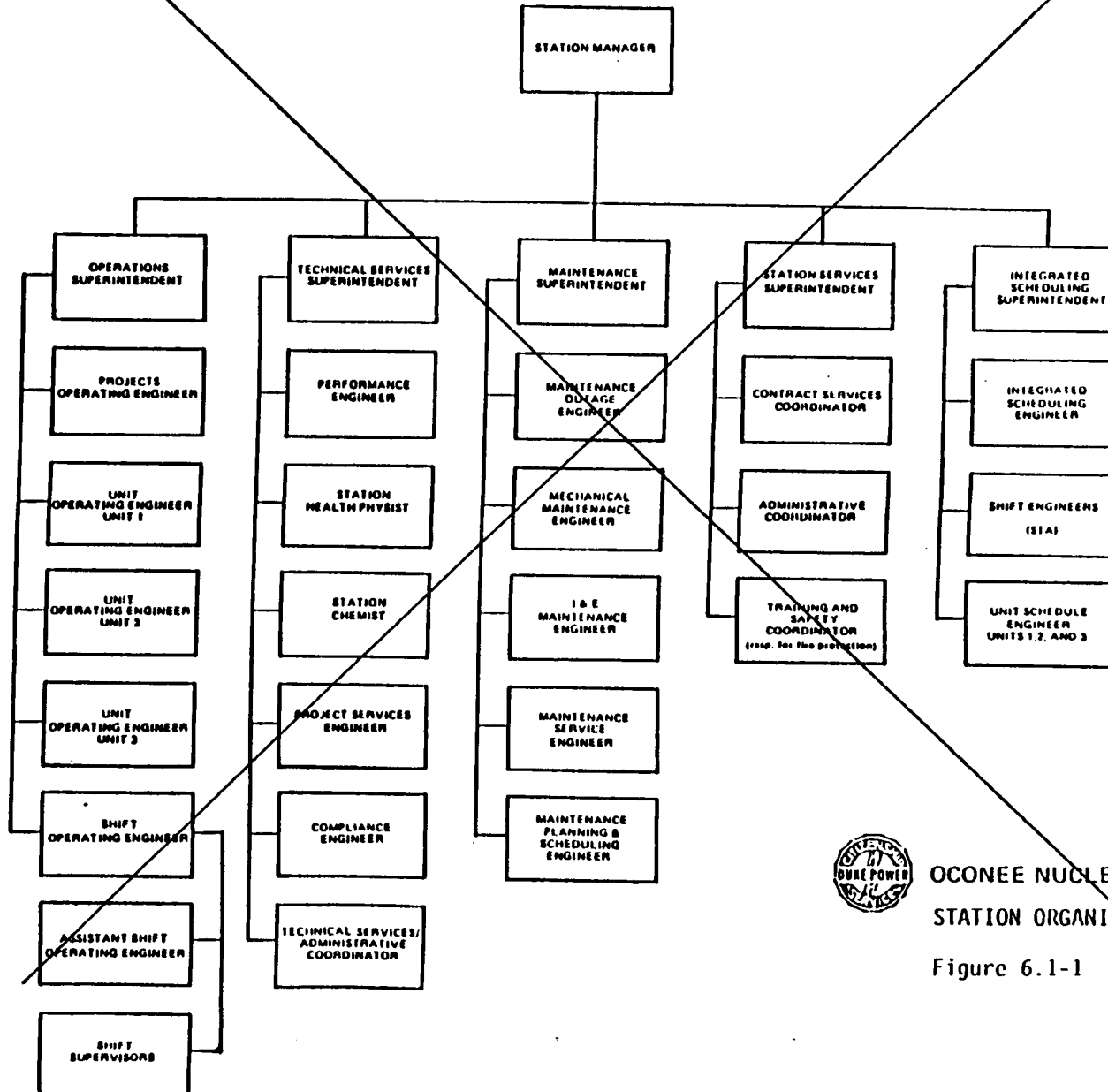
DUKE POWER COMPANY
OCONEE NUCLEAR STATION

PROPOSED TECHNICAL SPECIFICATION REVISION

<u>Remove Pages</u>	<u>Insert Pages</u>
viii	viii
6.1-1	6.1-1
6.1-1a	6.1-1a
6.1-7	--
6.1-8	--

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NUCLEAR STATION ORGANIZATION
FOR
OCONEE



OCONEE NUCLEAR STATION
STATION ORGANIZATION CHART

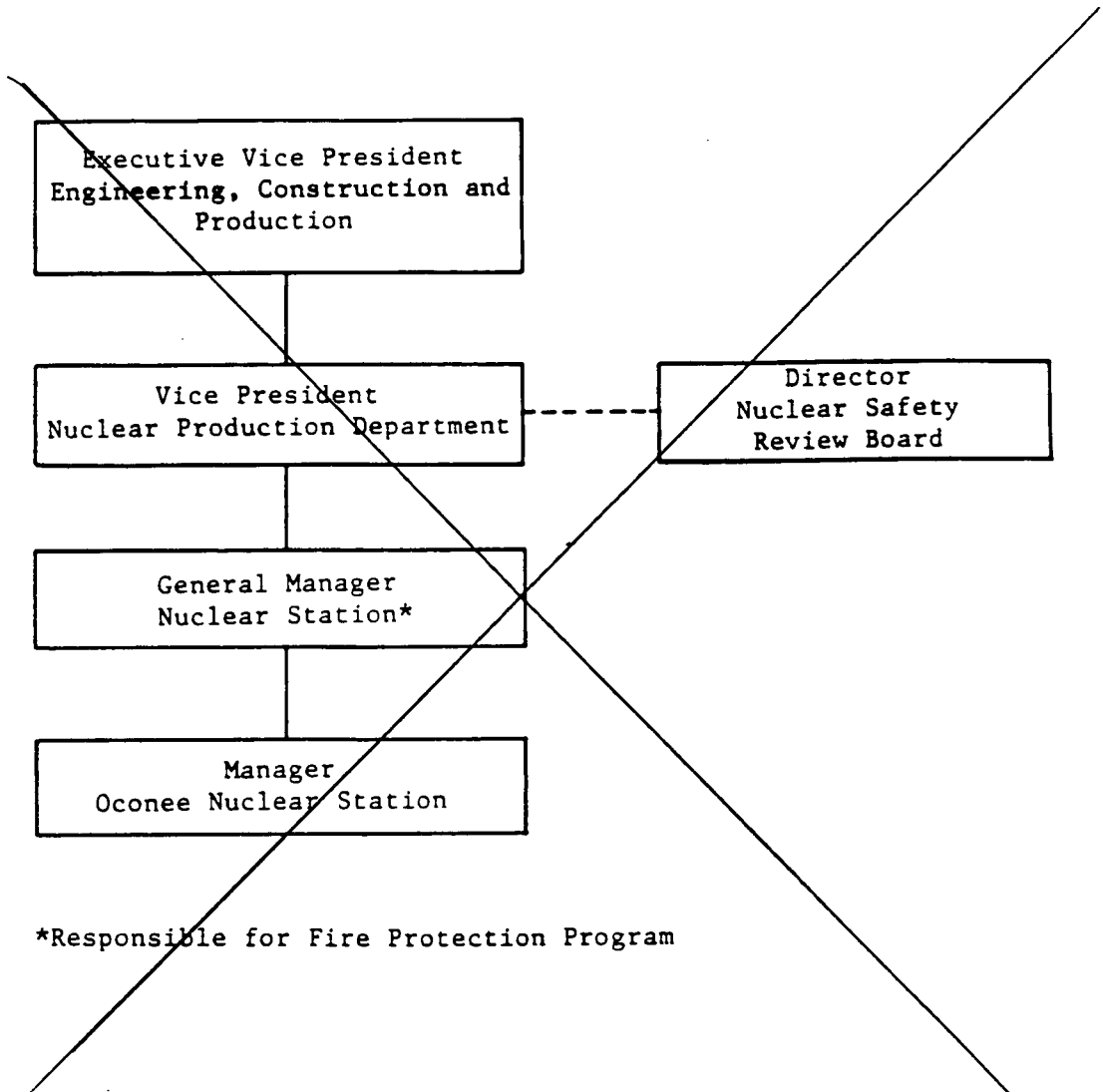
Figure 6.1-1

6.1-7

12/11/87

Amendment No. 165 (Unit 1)
Amendment No. 165 (Unit 2)
Amendment No. 162 (Unit 3)

DELETE



*Responsible for Fire Protection Program



OCONEE NUCLEAR STATION
MANAGEMENT ORGANIZATION CHART
Figure 6.1-2

the System Health Physicist and as approved by the Vice President, Nuclear Operations.

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.

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 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 Operating Engineer shall hold a Senior Reactor Operator license.

- 6.1.1.5 The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.
- 6.1.1.6 Minimum operating shift crew requirements shall be as specified in Table 6.1-1.
- 6.1.1.7 Retraining and replacement of station personnel shall be in accordance with Section 5.5 of the ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel."
- 6.1.1.8 A training program for the fire brigade shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions may be held quarterly.
- 6.1.1.9 The two functions of the Shift Technical Advisor, namely accident assessment and operating experience assessment, are fulfilled in the following manner:
 - a. An experienced SRO, who has been instructed in additional academic subjects, will be assigned on-shift to provide the accident assessment capability.
 - b. The operating experience assessment function will be provided by the Station Safety Review Group.

ATTACHMENT 2

Duke Power Company Oconee Nuclear Station

Justification for Proposed Changes and Evaluation of No Significant Hazards Considerations

Introduction

The proposed amendment in this submittal includes changes to Section 6 of the Oconee Nuclear Station Technical Specifications, Administrative Controls, based on guidance provided by Generic Letter 88-06, dated March 22, 1988. The Generic Letter provided guidance for deletion of the organization charts contained within Section 6 of the Technical Specifications provided certain statements be added to cover particular administrative control requirements. A discussion of the proposed changes in Attachment 1 is provided in the following paragraphs.

Discussion of Proposed Revisions to Technical Specifications

The following is a summary of the proposed Technical Specification revisions included in Attachment 1.

1. Specification 6.1.1 has been expanded to include a requirement for establishing onsite and offsite organizations for unit operation and corporate management. This requirement is consistent with the Generic Letter 88-06 guidance and the sample annotated copy of the Standard Technical Specifications provided as Enclosure 2 to the Generic Letter.
2. Specification 6.1.1.1 is a new requirement for establishment of lines of authority, responsibility, and communication.
3. The current Technical Specification 6.1.1.2 is deleted. The basic requirements of this specification are included in the proposed specifications 6.1.1.2 and 6.1.1.3 in accordance with the guidance provided in the Generic Letter.
4. The proposed Specification 6.1.1.2 designates the station manager as the management position responsible for overall unit operation. The proposed Specification 6.1.1.2 is an expanded version of the current Technical Specification 6.1.1.1 reflecting changes per guidance of Generic Letter 88-06.
5. The proposed Technical Specification 6.1.1.3 is a new requirement which designates an executive position that has corporate responsibility for overall plant safety as required by Generic Letter 88-06.
6. The proposed Technical Specification 6.1.1.4 is essentially the same as the current Specification 6.1.1.4 except a change of "the General Manager, Nuclear Stations" to "Vice President, Nuclear Operations" due to recent changes in the corporate organization.

7. The current Technical Specification 6.1.1.3 which references the organization charts is deleted since the proposed amendment will remove these charts from the Technical Specifications. The minimum operating shift crew requirements included in the current Technical Specification 6.1.1.3 are now under the new proposed Technical Specification 6.1.1.6 per guidance provided by Generic Letter 88-06.
8. The order of the current Technical Specifications 6.1.1.5, 6.1.1.6, and 6.1.1.7 is changed to 6.1.1.7, 6.1.1.8, and 6.1.1.9, respectively, for proper sequencing due to addition of new specifications. The text of these specifications remains unchanged.
9. Organization charts in Figures 6.1.1 and 6.1.2 are deleted per Generic Letter 88-06 guidance. The existing organization charts in Chapter 13 of the FSAR depicting the lines of authority and responsibility will be updated as necessary for any future changes to these organizations.
10. List of Figures on page viii is revised to indicate the deletion of the Organizational Charts on pages 6.1.7 and 6.1.8.

No Significant Hazards Consideration Evaluation

This proposed amendment would incorporate the guidance contained in the NRC's Generic Letter 88-06, dated March 22, 1988. The Generic Letter provided guidance for deletion of the organization charts contained within Section 6 of the Technical Specifications provided certain statements be added to cover particular administrative control requirements.

This proposed amendment has been developed based on the Generic Letter guidance.

The NRC Staff concluded and Duke Power concurs that the removal of organization charts from the Technical Specifications will provide greater flexibility to implement changes in organizational structure but will not reduce plant safety.

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 from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The proposed amendment does not involve an increase in the probability or consequences of any previously evaluated accident. This amendment is administrative in nature and does not change the design or operation of the facility. The accident analyses are therefore unaffected by this proposal.

The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The design and operation of the facility will not be changed by this amendment and no new modes of operation will be introduced.

The proposed amendment does not involve a significant reduction in a margin of safety. This change is administrative in nature and therefore has no effect on any margin of safety.

The NRC's discussion in their Generic Letter 88-06 concluded that any facility incorporating the changes outlined in the Generic Letter will have greater flexibility to implement changes to their organizational structures and will not reduce plant safety.

For the above reasons, Duke Power concludes that this proposed amendment does not involve any Significant Hazards Considerations.