

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
PACIFIC GAS AND ELECTRIC COMPANY)
)
Diablo Canyon Power Plant)
Units 1 and 2)
_____)

Docket No. 50-275
Facility Operating License
No. DPR-80

Docket No. 50-323
Facility Operating License
No. DPR-82

License Amendment Request
No. 88-06

Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company (PG&E) hereby applies to amend its Diablo Canyon Power Plant (DCPP) Facility Operating License Nos. DPR-80 and DPR-82 (Licenses).

The proposed changes amend the Technical Specifications (Appendix A of the Licenses) as regards Section 6.0, Administrative Controls.

Information on the proposed changes is provided in Attachments A and B.

These changes have been reviewed and are considered not to involve a significant hazards consideration as defined in 10 CFR 50.92 or require an environmental assessment in accordance with 10 CFR 51.22(b). Further, there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes.

Subscribed in San Francisco, California, this 20th day of May 1988.

Respectfully submitted,

Pacific Gas and Electric Company

By *D. A. Brand*

D. A. Brand
Senior Vice President
and General Manager
Engineering and Construction

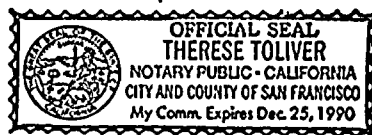
Howard V. Golub
Richard F. Locke
Attorneys for Pacific
Gas and Electric Company

By *Richard F. Locke*
Richard F. Locke

Subscribed and sworn to before me
this 20th day of May 1988.

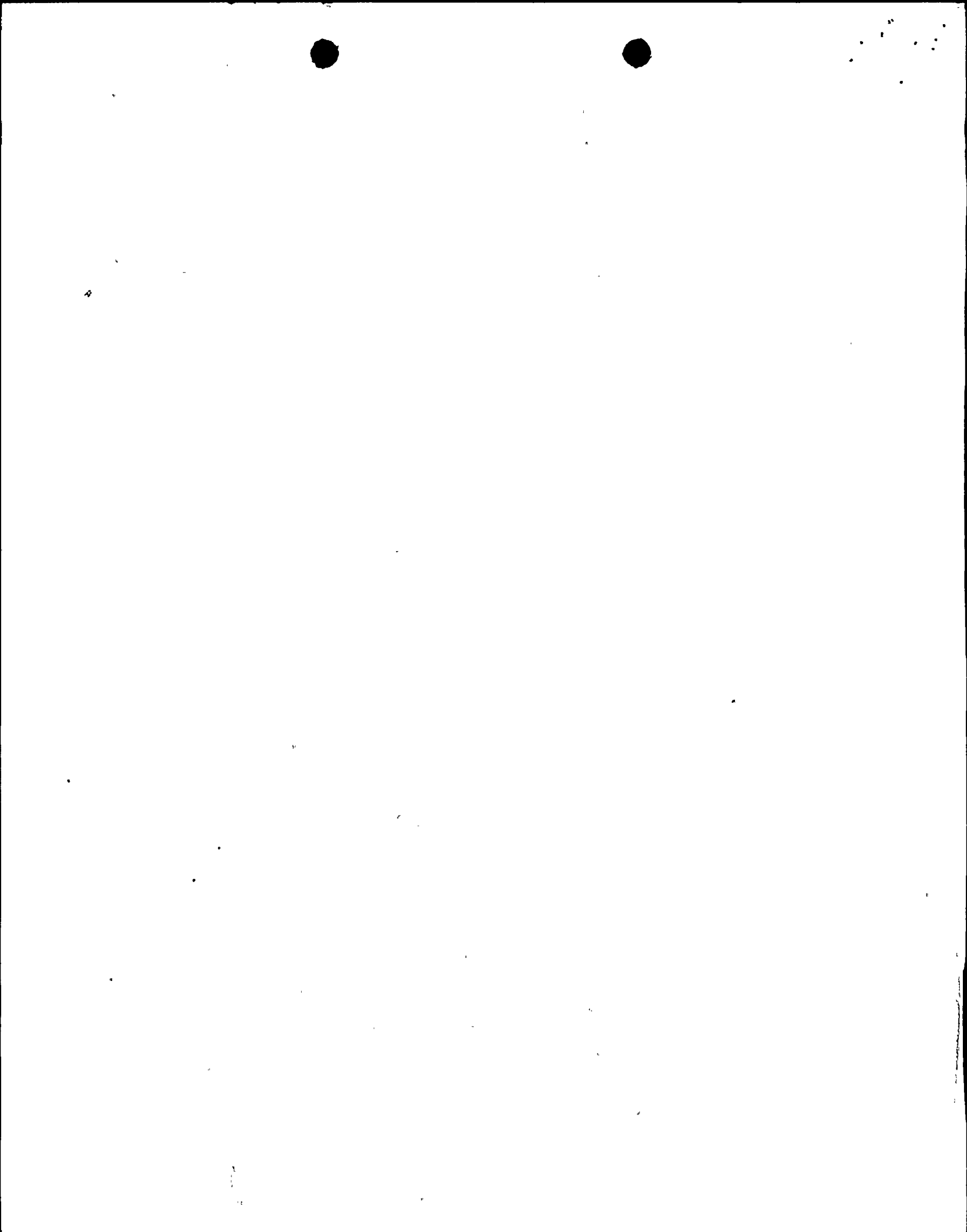
Therese Toliver
Therese Toliver, Notary Public in
and for the City and County of
San Francisco, State of California

My commission expires December 25, 1990



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Attachment A

ADMINISTRATIVE CONTROLS REMOVAL OF ORGANIZATION CHARTS AND MANAGEMENT TITLE CHANGES

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Administrative Controls 6.2 to remove Figure 6.2-1, "Offsite Organization" and Figure 6.2-2, "Plant Organization". General requirements that address the essential aspects of the organizational structure that are defined by the existing organization charts are added. This LAR also proposes to change the titles of certain Plant Staff Review Committee members in Administrative Controls 6.2.2, 6.3, 6.5.1.2, and 6.12.1.

Proposed changes to the Technical Specifications of Operating License Nos. DPR-80 and DPR-82 are noted in the marked-up copy of the applicable Technical Specification (Attachment B).

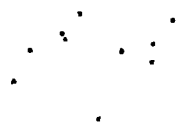
B. BACKGROUND

The content required in the Administrative Controls Section of the Technical Specifications is specified in 10 CFR 50.36.c(5). That provision requires only that the Technical Specifications contain provisions relating to organization and management procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner and does not specifically require inclusion of organizational charts in the Technical Specifications.

In Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Controls Requirements", dated March 22, 1988, the NRC has provided guidance for the removal of organization charts. The NRC has concluded that the removal of organization charts from the Technical Specifications will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure. Further, changes in the titles of certain Plant Staff Review Committee members are proposed to more accurately reflect the individual functions.

C. JUSTIFICATION

Previously, organization changes have required PG&E to submit license amendment requests and the NRC to approve these requests prior to implementing a change to the structure of an offsite or onsite organization. Consistent with the NRC and industry commitment to improve Technical Specifications, PG&E proposes to remove the organization charts from the Technical Specifications. Removal of the organization charts will eliminate unnecessary expenditure of resources for both organizations. This LAR is consistent with the guidance provided in Generic Letter 88-06 for removal of organization charts from the Technical Specifications.



Both the change to the titles of certain Plant Staff Review Committee members and the change to reflect Plant Manager (rather than Plant Superintendent) authorization for changes to plant staff working hours guidelines are administrative changes to reflect the DCPD organization.

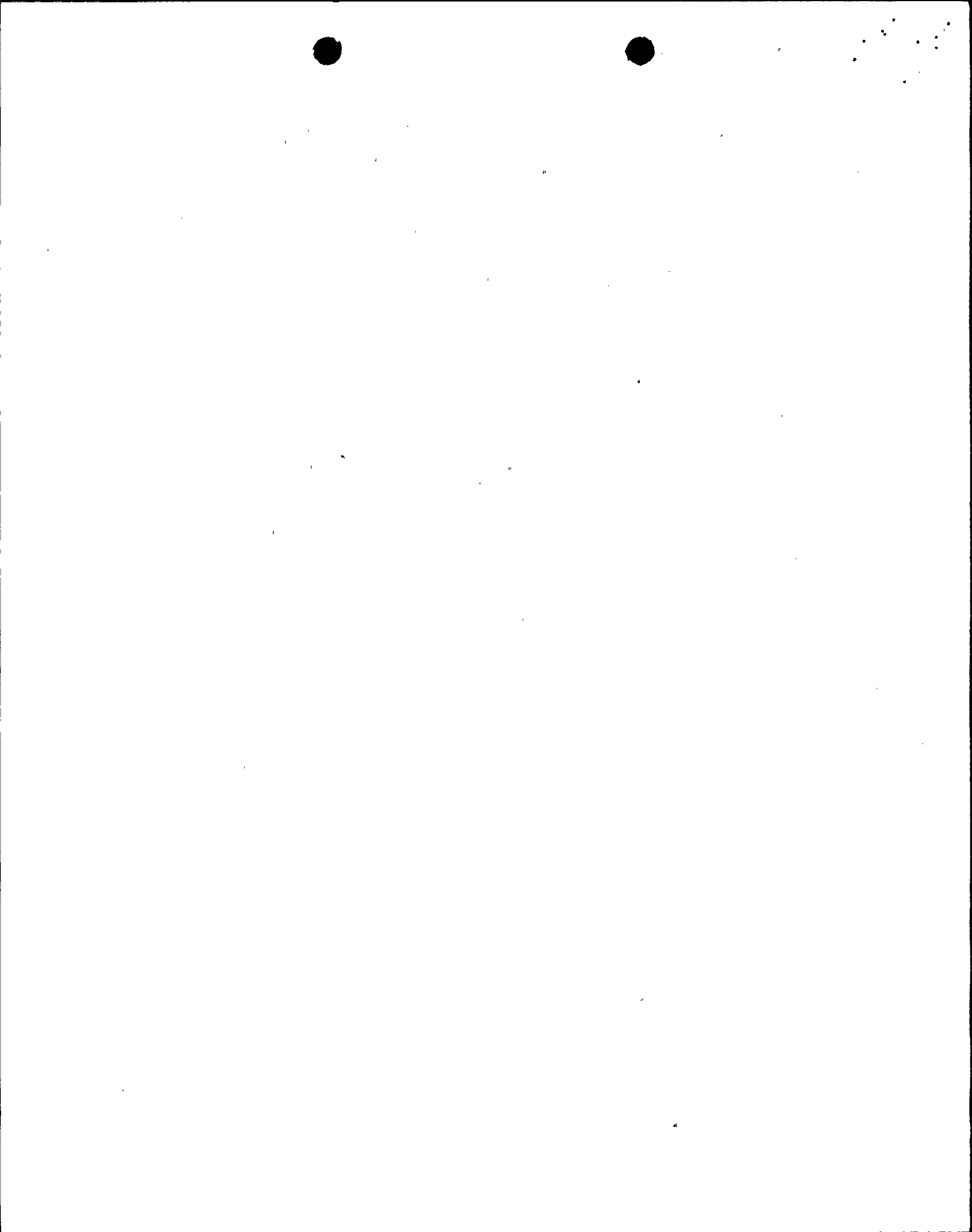
D. SAFETY EVALUATION

Removal of the organization charts from the Technical Specifications does not affect plant operations. Specific operational requirements are detailed in other Technical Specifications that bear more directly on operational safety than the organization charts. The change to the titles of certain management personnel does not change the number of members, composition, or function of the Plant Staff Review Committee. The revision is administrative in nature.

As in the past, the NRC will continue to be informed of organizational changes and management personnel titles through other required controls. For example, 10 CFR Part 50.34(b)(6)(i) requires that the applicant's organizational structure be included in the FSAR. Consistent with Generic Letter 88-06, Section 13.1 of the FSAR Update currently provides a functional description of the organization, a functional description of key personnel positions, and detailed organization charts. The organization charts in the DCPD FSAR Update are more detailed than those presently in the Technical Specifications. As required by 10 CFR 50.71(e), PG&E submits annual revisions to the FSAR Update.

The removal of the organization charts and title changes represent no reduction in the current safety requirements, as the following conditions will be included in the Technical Specifications:

- (1) A requirement that lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those 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 equivalent forms of documentation.
- (2) Designation of an executive position that has corporate responsibility for overall plant nuclear safety and authority to take such measures as may be needed to ensure acceptable performance of staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- (3) Designation of a management position in the onsite organization that is responsible for overall unit operation and has control over those onsite activities necessary for safe operation and maintenance of the plant.



- (4) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license.
- (5) Provisions of sufficient organizational freedom to be independent of operational pressures to those individuals who perform the functions of health physics, quality assurance, and training of operating staff.

Based upon the information provided above, PG&E believes that there is reasonable assurance that the health and safety of the public will not be adversely affected by title changes and removing the organization charts from the Technical Specifications.

E. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazard considerations involved with the proposed amendment, focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

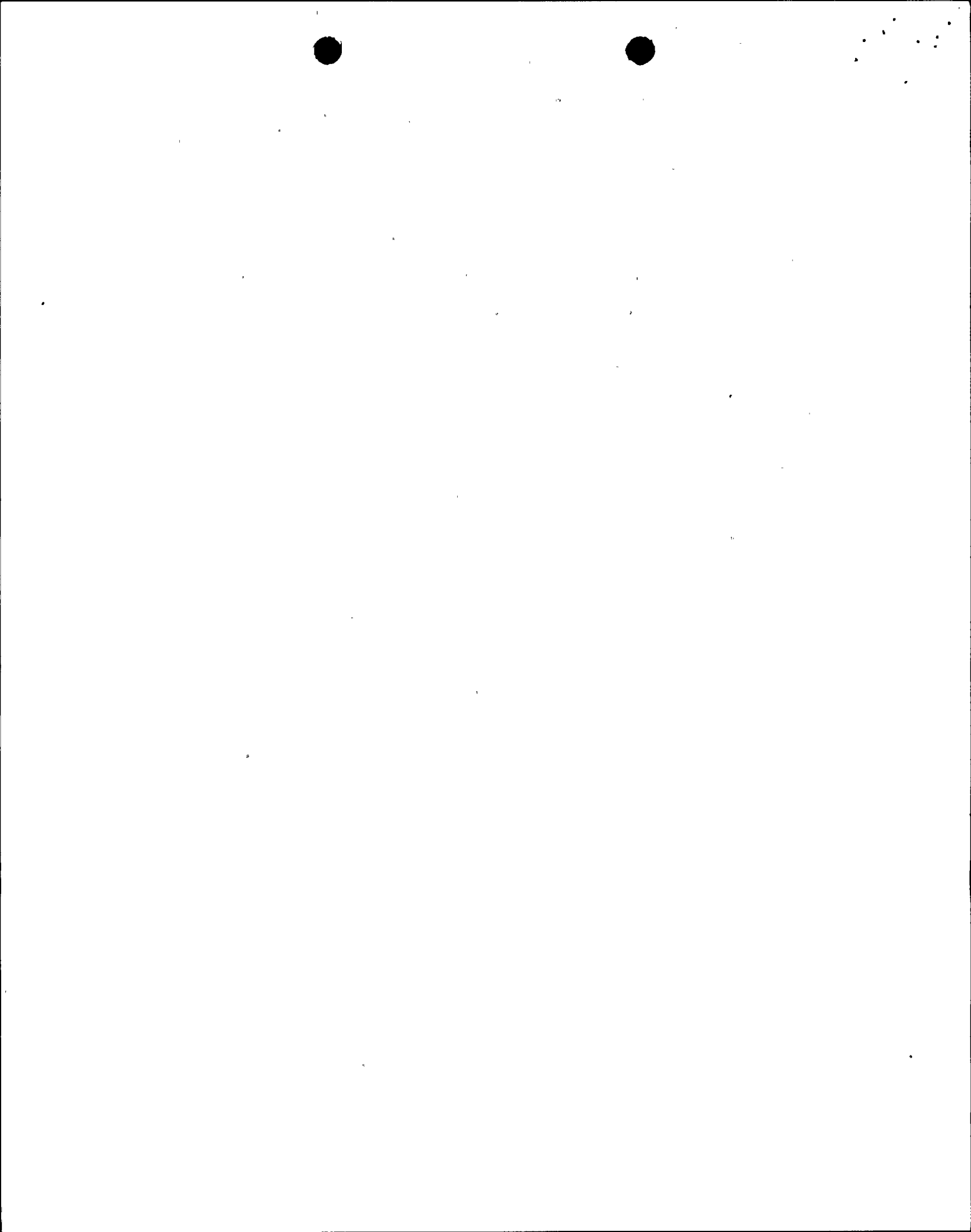
The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or a testing facility involves no significant hazards considerations, if operation of the facility 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 following evaluation is provided for the no significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because title changes and removal of the organization charts from the Technical Specifications is administrative in nature and does not affect plant operations or the number of members, composition, or function of the Plant Staff Review Committee. As in the past, the NRC will continue to be informed of organizational changes through other required controls. 10 CFR Part 50.34(b)(6)(i) requires that the applicant's organizational structure be included in the FSAR.



Chapter 13 of the DCPD FSAR Update provides a description of the organization and detailed organization charts. The organization charts in the FSAR Update are more detailed than those presently in the Technical Specifications. As required by 10CFR50.71(e), PG&E submits annual revisions to the FSAR Update.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated because there is no physical alteration to any plant system, nor is there a change in the method in which any safety related system performs its function.

The proposed changes are administrative in nature and, therefore, do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed revision is administrative in nature and therefore will not reduce any margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety evaluation, PG&E concludes that the activities associated with this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

G. ENVIRONMENTAL EVALUATION

Pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required because the amendment concerns changes in administrative procedures and requirements. The change qualifies for categorical exclusion per 10 CFR 51.22(c)(10).

Furthermore, PG&E has evaluated the proposed changes and determined that the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure.

