

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION


In the Matter of)	Docket No. 50-275
PACIFIC GAS AND ELECTRIC COMPANY)	Facility Operating License
)	No. DPR-80
Diablo Canyon Power Plant)	Docket No. 50-323
Units 1 and 2)	Facility Operating License
)	No. DPR-82

License Amendment Request
No. 98-04

Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company hereby applies to amend its Diablo Canyon Power Plant Facility Operating License Nos. DPR-80 and DPR-82 (Licenses). This license amendment request proposes to revise Technical Specifications (TS) 6.2.2g. and 6.3 regarding the requirement for the Operations Manager to hold a senior reactor operator (SRO) license. The proposed changes will provide PG&E with additional flexibility and assure that operating crew oversight by an individual with an SRO license is maintained.

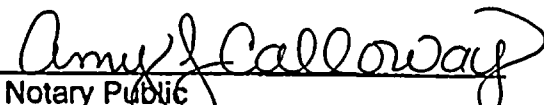
Information on the proposed TS change is provided in Attachments A, B, C, and D. The change has been reviewed and does not involve a significant hazards consideration as defined in 10 CFR 50.92 or an unreviewed environmental question. Further, there is reasonable assurance that the proposed change will not adversely affect the health and safety of the public.


Sincerely,

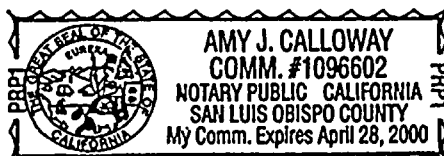

Gregory M. Rueger

Subscribed and sworn to before me
this 10th day of April, 1998

Attorneys for Pacific Gas
and Electric Company
Roger J. Peters
Richard F. Locke


Notary Public


Richard F. Locke



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**REVISION OF TS 6.2.2g. AND 6.3 TO ELIMINATE REQUIREMENT FOR THE
OPERATIONS MANAGER TO HOLD A SENIOR REACTOR OPERATOR
LICENSE**

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specifications (TS) 6.2.2g. and 6.3 as follows:

1. TS 6.2.2g. would be revised to change the title of the Operations Manager to be the Operations Director.
2. TS 6.2.2g. would be revised to replace the requirement for the Operations Director to hold a senior reactor operator (SRO) license with the requirement that the Operations Director hold or have held an SRO license for Diablo Canyon Power Plant (DCPP) or on a pressurized water reactor (PWR), or be certified to an equivalent level of knowledge, and that if the Operations Director does not hold an SRO license for DCPP, an Operations middle manager hold an SRO license.
3. TS 6.3 would be revised to include the Operations Director as an exception in meeting the requirements of ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," as discussed in TS 6.2.2g.

The proposed changes are provided in the marked-up copies of the TS pages in Attachment B. The proposed new TS pages are provided in Attachment C. Marked up copies of the improved TS submitted as part of LAR 97-09 are included in Attachment D.

B. BACKGROUND

TS 6.2.2g. requires that the Operations Manager hold an SRO license for DCPP. The PG&E job title corresponding to this position at DCPP is the Operations Director. The purpose of this requirement was to assure that the off-shift manager responsible for directing the activity of the crews was familiar with plant operations and plant emergency response.

The current structure of the DCPP Operations Services organization is delineated in Figure 1. The Manager - Operations Services is responsible for the organizations that provide operational support to the

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plant. These areas include the Operations Section, the Radiation Protection Section, and the Chemistry Section.

The DCPD Operations Director reports to the Manager - Operations Services, and is responsible for overall management of the Operations Section, including administrative and engineering functions. The individual in this position is currently required to hold an SRO license for DCPD per TS 6.2.2g.

Currently, a day-shift shift supervisor (SS) is responsible for coordination of the activities of the SSs. The day-shift SS holds an SRO license for DCPD and is not a member of an on-shift operating crew. This position is similar to the Operations middle manager position requirements described in ANSI/ANS 3.1-1993, Section 4.3.

The five on-shift SSs currently report to the Operations Director (see Figure 1). The SSs have management responsibility for both units, act as the management liaison between their crew and management, and represent management when other more senior members of the Operations Section management team are not present (such as during backshift). The shift foreman of each unit reports to the SS. The proposed change would allow the on-shift SSs to report to an Operations middle manager that meets the requirements of ANSI/ANS 3.1-1993, Section 4.3 if the Operations Director does not hold an SRO license for DCPD (see Figure 2).

TS 6.3, "Plant Staff Qualifications," requires members of the DCPD staff to meet or exceed the minimum qualifications of ANSI N18.1-1971 as clarified further in the specifications. ANSI N18.1-1971 requires the Operations Manager (fulfilled by the position of Operations Director at DCPD) to hold an SRO license at the time of appointment to the position. The proposed change to TS 6.3 would be an exception to the requirement of ANSI N18.1-1971.

ANSI/ANS 3.1-1993, which updated ANSI N18.1, Sections 4.2.2 (1)a through c, contains standards which further delineated the qualification requirements for Operations management, allowing the PG&E equivalent job title of Operations Director to hold an SRO license, have held an SRO license for a similar unit, or be certified as with an equivalent SRO level of knowledge. ANSI/ANS 3.1-1993 also states that if the individual in this position does not hold an NRC license, then an Operations middle manager shall hold an SRO license.

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10 CFR 50.54(l) states those individual responsible for directing the licensed activities of licensed operators shall be licensed as SROs. The proposed change continues to meet this requirement by ensuring Operations management personnel that direct the activities of licensed operators maintain the appropriate qualification levels.

C. JUSTIFICATION

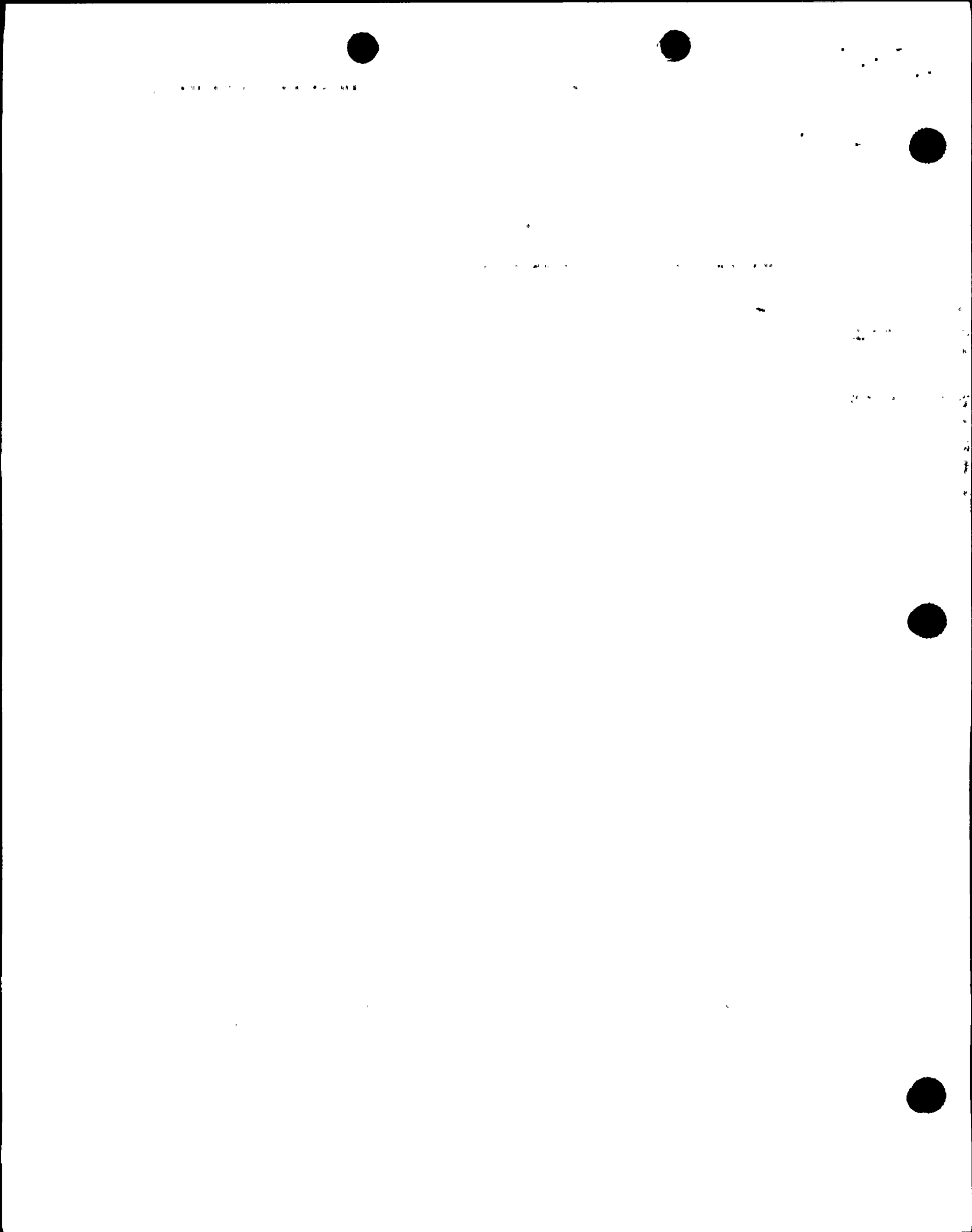
The revision to the TS would provide PG&E with the flexibility to choose a candidate for Operations Director that would be best capable of providing leadership to the Operations Section, while assuring that the individual is familiar with basic PWR design, equipment operation, and emergency event mitigation. The proposed changes meet the requirements of ANSI/ANS 3.1-1993, Sections 4.2.2 and 4.3, and 10 CFR 50.54(l).

The changes proposed in this LAR are similar to changes approved for Shearon Harris, Hope Creek, Millstone Unit 3, South Texas Project Units 1 and 2, Indian Point Unit 3, and Point Beach Units 1 and 2.

D. SAFETY EVALUATION

As previously stated, ANSI N18.1-1971 requires that the Operations Manager hold an SRO license. However, later guidance in ANSI 3.1-1993 allows the Operations Manager to hold or have held an SRO license on a similar unit, or be certified to an equivalent level of knowledge. If the Operation Manager does not hold an SRO license, an Operations middle manager must hold an SRO in accordance with ANSI/ANS 3.1-1993, Section 4.2.2.

Although the Operations Manager (Operations Director at DCPD) may not hold an SRO license for DCPD, the requirement that he has held an SRO at a PWR or be certified to an equivalent level of knowledge assures that he has the required knowledge to perform his duties of coordinating overall Operations Section activities. Requiring an Operations middle manager to hold an SRO license for DCPD if the Operation Director does not assure that the requirements of 10 CFR 50.54(l) are satisfied in that only individuals that hold SRO licenses would be directing the licensed activities of other licensed operators. The Operations middle manager will meet the requirements specified in ANSI/ANS 3.1-1993, Section 4.3.



Since all regulatory requirements and acceptable standards continue to be met by the proposed specifications, there is reasonable assurance that the health and safety of the public will not be affected by the proposed change.

E. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazards considerations (NSHC) involved with the proposed amendment, focusing on the three standards set forth in 10 CFR 50.92(c) as set forth 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 for 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 NSHCs.

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

The proposed change to revise the title of the Operations Manager to Operations Director is an administrative change that clarifies the Technical Specifications (TS) to reflect current position titles.

The proposed change provides assurance that the Operations Director will continue to have knowledge of pressurized water reactor (PWR) operation and emergency event mitigation. The proposed change does not detract from the Operations Director's ability to perform his primary responsibilities. In this case, by having previously held a senior reactor operator (SRO) license, the Operations Director has achieved the necessary training, skills, and experience to fully understand the operation of plant equipment and the watch requirements for

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operators. In summary, the proposed change does not affect the ability of the Operations Director to provide the plant oversight required of his position.

Additionally, another off-shift individual that holds an SRO license for Diablo Canyon Power Plant (DCPP) directs the licensed activities of licensed operators (an Operations middle manager). will have specific knowledge of operation and emergency event mitigation at DCPP. This will assure that the change in qualification of the Operations Director does not affect the probability of an operator initiating an accident or increasing the consequences of an accident due to improper direction from management. The training and qualification programs for operators on shift will not be affected by the proposed changes.

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 change to revise the title of the Operations Manager to Operations Director is an administrative change that clarifies the TS to reflect current position titles.

The proposed change to TS 6.2.2g. and 6.3 do not affect the design or function of any plant system, structure, or component, nor does it change the way plant systems are operated. It does not affect the performance of NRC licensed operators since the proposed changes do not impact the training or qualification of any operator on shift. Operation of the plant in conformance with TS and other license requirements will continue to be supervised by personnel who hold an SRO license. The proposed change to TS 6.2.2g. and 6.3 ensures that the Operations Director will be a knowledgeable and qualified individual by requiring the individual to have held an SRO license at a PWR.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change to revise the title of the Operations Manager to Operations Director is an administrative change that clarifies the TS to reflect current position titles.

The proposed change involves an administrative control that is not related to the margin of safety. The proposed change does not reduce the level of knowledge or experience required of an individual who fills the Operations Director position, nor does it affect the conservative manner in which the plant is operated. The on-shift licensed operators will continue to be supervised by personnel who hold an SRO license in accordance with 10 CFR 50.54(l).

Therefore, neither of the proposed changes involves a significant reduction in a margin of safety.

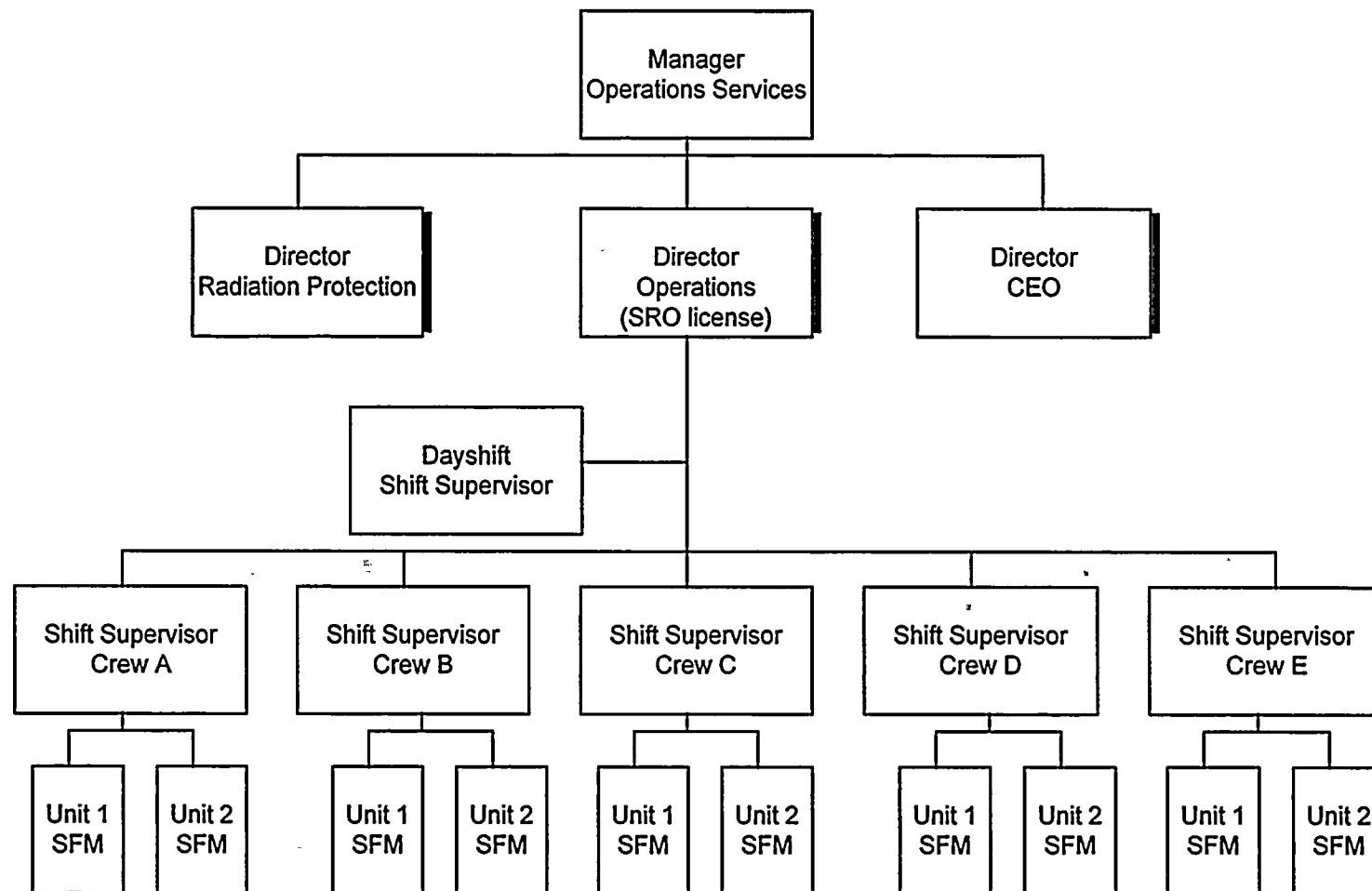
F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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

G. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined 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. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

Figure 1





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Figure 2

