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RECIP.NAME RECIPIENT AFFILIATION
BUTLER,W.R. Project Directorate I-2

SUBJECT: Forwards revised application for amends to Licenses NPF-14 & NPF-22 re changes to offsite organization.

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JUN 10 1988

Director of Nuclear Reactor Regulation
Attention: Dr. W.R. Butler, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REVISION TO PROPOSED AMENDMENTS 109 AND 60 TO
LICENSE NOS. NPF-14 AND NPF-22:
RESPONSE TO GENERIC LETTER 88-06
(REMOVAL OF ORGANIZATION CHARTS)
PLA-3035 FILE A17-2

Docket Nos. 50-387
and 50-388

Reference: PLA-2988, H.W. Keiser to W.R. Butler, "Proposed Amendments 109 to License No. NPF-14 and 60 to License No. NPF-22: Changes to Offsite Organization," dated February 24, 1988.

Dear Dr. Butler:

The purpose of this letter is to revise the referenced proposed amendments to the Susquehanna SES Units 1 and 2 Technical Specifications based on the recommendations which the NRC provided via Generic Letter 88-06.

BACKGROUND

The Technical Specifications contain organization charts which must be updated whenever they are affected by a PP&L organization change; this was the motivation for the referenced proposal. The charts contain little explicit information of safety significance and therefore are an inappropriate tool to measure the safety effectiveness of PP&L's management structure.

In order to improve the Technical Specifications in this area, the NRC has issued Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements." This guidance encourages the replacement of the organization charts with general organizational requirements. PP&L has reviewed the changes proposed by the generic letter, and concurs that they are an effective resolution to the problem presented by the organization charts. Therefore, our referenced proposal is being revised to delete the subject charts rather than modify them. The changes to Subsection 6.8.2 are still requested based on the justification originally provided.

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DESCRIPTION OF CHANGES

PP&L is proposing changes that are in complete accord with the example changes provided in the generic letter; marked-up copies of these changes are attached.

SAFETY ANALYSIS

The line item changes are designed to clarify the requirements essential to safe operation that are already embodied in the current organization charts. Per the Generic Letter, these requirements are:

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 in 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 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 the operating staff.

A discussion of how each of these items is proposed to be incorporated into the SSES Technical Specifications is provided below; this includes a reference to how each item is currently controlled.

Item 1 is proposed to become Specification 6.2.2.a. The required information is currently contained in FSAR Section 13.1, which is updated in accordance with 10 CFR 50.71.

Item 2 is proposed to become Specification 6.2.2.c. The responsibility of the Senior Vice President-Nuclear is currently implicit in Figure 6.2.1-1, and is discussed in detail in FSAR Section 13.1.

Item 3 is proposed to become Specification 6.2.2.b. The responsibility of the Superintendent of Plant-SSES is currently implicit in Figure 6.2.2-1, and is discussed in detail in FSAR Section 13.1.

Item 4 is proposed to become Specification 6.2.2.g. The requirement for the Supervisor of Operations to hold an SRO license is currently shown on Figure 6.2.2-1. Further SRO/RO requirements are currently provided (and will be retained) in Table 6.2.2-1, "Minimum Shift Crew Composition."

Item 5 is proposed to become Specification 6.2.2.d. The requirements for independence from "operating pressures" is currently implicit on Figure 6.2.1-1 for the QA and Training functions. For Health Physics, this requirement is consistent with PP&L's philosophy as documented in FSAR Subsections 13.1.2.2.3 and 12.5.1.

Based on the above, the proposed changes will correct the problem posed by the organization charts without changing PP&L's current level of commitment regarding its management structure. Therefore, no change has occurred to the current level of plant safety as ensured by that structure.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed changes do not:

I. Involve a significant increase in the probability or consequences of an accident previously evaluated.

PP&L's management structure plays no role in any safety analysis.

II. Create the possibility of a new or different kind of accident from any accident previously evaluated.

Reformatting existing requirements related to how PP&L's management structure ensures safe operation has no impact on the design and operation of SSES as documented in the FSAR.

III. Involve a significant reduction in a margin of safety.

The proposed changes have been shown to be consistent with PP&L's existing commitments as documented in the FSAR. Since the organizational charts provided no safety significant information that is not being retained in another form, no change to the margin of safety of which they formed a part will occur due to their deletion.

Any questions on the above material should be directed to Mr. R.R. Sgarro at (215) 770-7916.

Very truly yours,

H. W. Keiser

Attachments

cc: NRC Document Control Desk (original)
NRC Region I
Mr. F. I. Young, NRC Sr. Resident Inspector-SSES
Mr. M. C. Thadani, NRC Project Manager-Bethesda
Mr. T. M. Gerusky, Pennsylvania DER