



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 28 TO FACILITY OPERATING LICENSE NO. DPR-18  
ROCHESTER GAS AND ELECTRIC CORPORATION  
R. E. GINNA NUCLEAR POWER PLANT  
DOCKET NO. 50-244

INTRODUCTION

1.0 By letter dated December 28, 1987 as clarified on May 5, 1988, Rochester Gas and Electric Corporation (RG&E or the licensee) submitted a request for changes to the R. E. Ginna Nuclear Power Plant Technical Specifications. The proposed changes request the deletion of the organization charts from the Technical Specifications.

2.0 EVALUATION

Section 6.0 of the licensee's Technical Specifications (TS) is required to contain the details of those Administrative Controls necessary to assure safe operation of the facility. The proposed revisions would replace figures 6.2-1 through 6.2-5 on the organization with more general organizational requirements. The required content of the administrative controls section of the TS is specified in 10 CFR 50.36(c)(5). The regulation, however, does not specify that organization charts be included in the plant specifications. The proposed revision establishes guidance for the management organization both onsite and offsite. The specific organization charts will be maintained in chapter 13 of the UFSAR and the Ginna Quality Assurance manual. The minimum shift crew requirements for the plant is retained in the TS. The removal of the charts will eliminate needless expenditure of resources for both organizations for processing unnecessary amendments.

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### Regulatory Requirements Applicable to Organizational Structure

10 CFR 50.36, "Technical Specifications," which implements Section 182a. of the Atomic Energy Act, was promulgated by the Commission on December 17, 1968 (33 FR 18610). This rule delineates requirements for determining the contents of TS. Technical Specifications set forth the specific characteristics of the facility and the conditions for its operation that are required to provide adequate protection to the health and safety of the public. Specifically, 10 CFR 50.36 requires that:

Each license authorizing operation of a production or utilization facility of a type described in §50.21 or §50.22 will include Technical Specifications. The Technical Specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to 50.34. The Commission may include such additional TS as the Commission finds appropriate.

The regulation further states that TS will include, among other things, items in the following category:

- (5) Administrative Controls: Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. Each licensee shall submit any reports to the Commission pursuant to approved Technical Specifications as specified in §50.4.

### Past Practice

Review of the organization, personnel qualifications, education, experience, training, and their overall capacity to operate a plant safely has always been of concern to the NRC, and its predecessor the AEC. Before a plant is licensed to operate, a finding is made that the applicant's staff is capable of operating the plant safely. In the past, the organization charts were made TS so that changes made after operation began would require prior NRC approval. This was done to preserve certain specific features of the licensed organization.

While the regulation does not specifically require that TS contain organization charts, the practice of including organization charts in TS began in the late 1960s. These charts were used as an aid in depicting the organizational and management relationships thought to be needed to meet the provisions of 10 CFR 50.36(c)(5). The practice of including organization charts in TS has continued since.

Organization charts do depict the reporting chain for some organizational functions that must be independent of scheduling and operating pressures. Until 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," was adopted in 1970, organization charts were partially relied on by the staff for assuring this function.

As stated in 10 CFR Part 50, Appendix B, Criterion I, "Organization":

Such persons and organizations performing quality assurance functions shall report to a management level such that this required authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations, are provided.

Appendix B further acknowledges that the organizational structures may take many forms, but emphasizes that regardless of structure, the individuals assigned the responsibility for execution of any portion of the program shall have access to such levels of management as may be necessary to perform this function. The licensee's required QA Program specifies and depicts these organizational relationships in greater detail than currently exist in TS.

The practice of including organizational charts in TS was established before the advent of 10 CFR Part 50, Appendix B, - "Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants," and other associated guidance documents, such as the Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants," and NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants LWR Edition." A general description of the features needed by the staff to make the finding that the applicant is capable of operating the plant safely are now mandated by Appendix B.

#### Safety Considerations

The fundamental safety issue in this license amendment request is whether there can be reasonable assurance that the organization will operate the plant safely and remain effective without requiring prior staff approval for changes reflected in organization charts.

It has been the staff's experience that organization charts by themselves have been little help to reviewers in assessing the safety significance of changes to the plant and license. Nevertheless, because the charts are in the TS, license amendment requests have been required to effect organizational changes as simple as combining some minor functions under one organizational element shown on the chart. The usefulness of the charts to the staff in recent years has been minimal and the safety relevance of the charts themselves is small.

Specific operational requirements that bear more directly on the safety matters of concern to the staff than the organization charts are required elsewhere in TS. As examples, the organizational element responsible for control room command function is identified separately in the TS, as are the requirements for minimum staffing under various operating modes. The organizational management functions for independent reviews and audits, unit review group, and shift technical advisor are also specified in other TS. Thus, the organizational charts themselves are not needed to support the staff's finding that the organization will operate the plant safely.

In summary, the specific details of the operating organization are not essential to the safe operation of the facility; and the staff concludes that the details can be modified in many ways while maintaining adequate operational safety. The staff, over the years of experience with the details of operating organizations, has been able to distill those organizational characteristics which are important to assure plant safety.

The important features of a licensee's organization (currently depicted on the TS organization charts, but not already included in other TS) necessary for the staff to find that the organization will operate the plant safely are stated below. This amendment revises the TS to incorporate the following features to replace the organizational charts:

- a. 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 organizational charts, functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions or in equivalent forms of documentation. These organizational relationships will be maintained in a document such as the FSAR or QA Manual.
- b. There shall be an individual executive position in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant so that continued nuclear safety is assured.
- c. There shall be an individual management position in the onsite organization having responsibilities for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- d. Although the individuals who train the operating staff and those who carry out the health physics and quality assurance functions may report to the appropriate manager on site, they shall have sufficient organizational freedom to take actions to a level independent from the plant operational organization.
- e. Senior Reactor Operator (SRO) and Reactor Operator (RO) licenses shall continue to be required for the positions so indicated on the previous TS organization charts.

The proposed changes incorporate these features. Therefore, the staff concludes that the removal of the organization charts from the TS will not prevent the licensees from meeting the standards of 10 CFR 50.36 and the underlying statutory requirements. Moreover, the deletion of unnecessary detail of organization charts will save resources for both the NRC and the licensees and will allow the staff to focus on issues of importance to the plant's safety.

#### 4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

#### CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration, which was published in the Federal Register on March 9, 1988 (53 FR 7601). The State of New York was consulted and they did not have any comments nor were there any public comments or requests for hearing.

The staff has concluded, based on the considerations discussed above, that; (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations; and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: May 31, 1988