

Attachment A

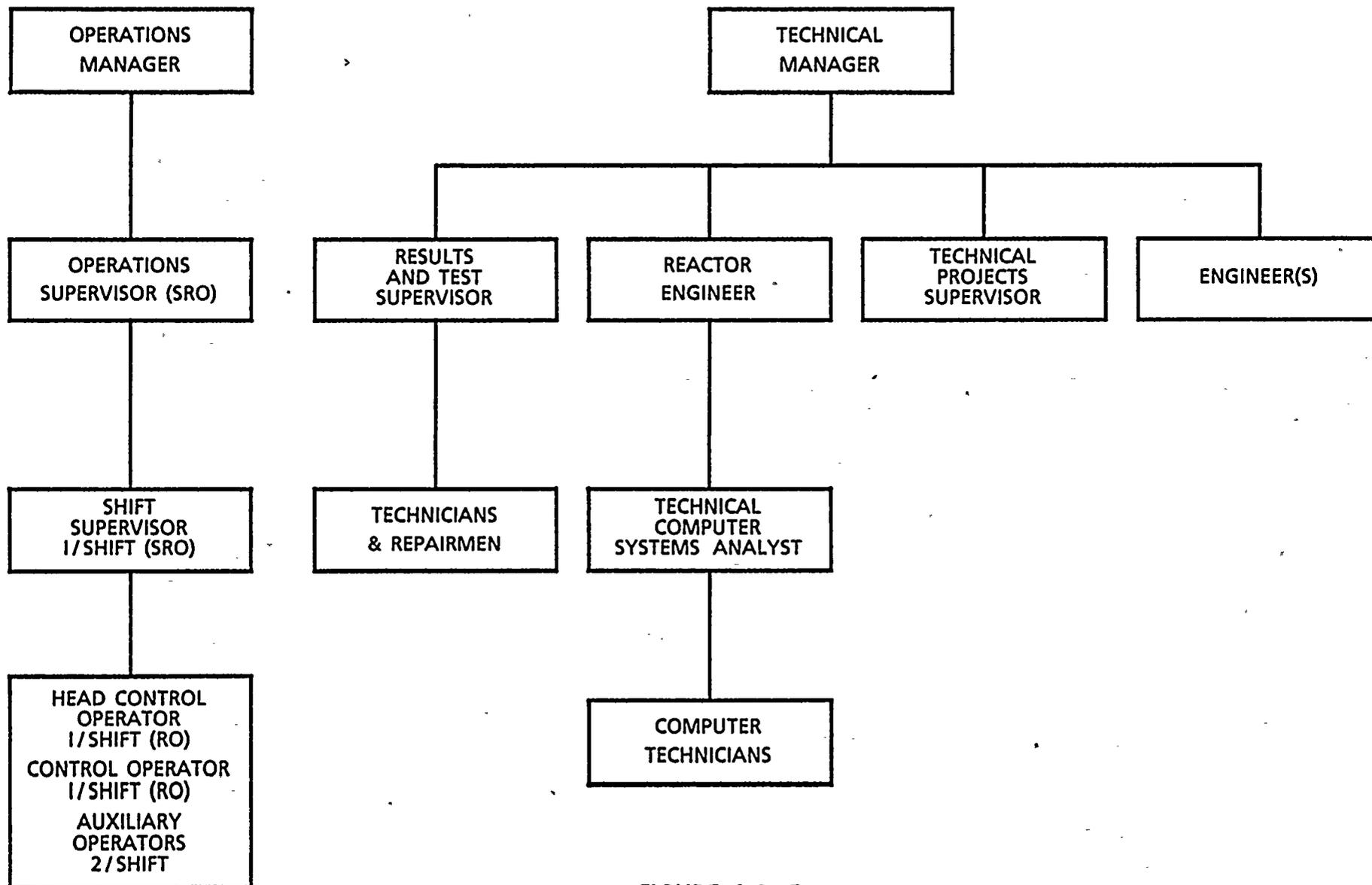
1. Replace Technical Specification pages 6.2-7 and 6.3-1 with the enclosed pages.

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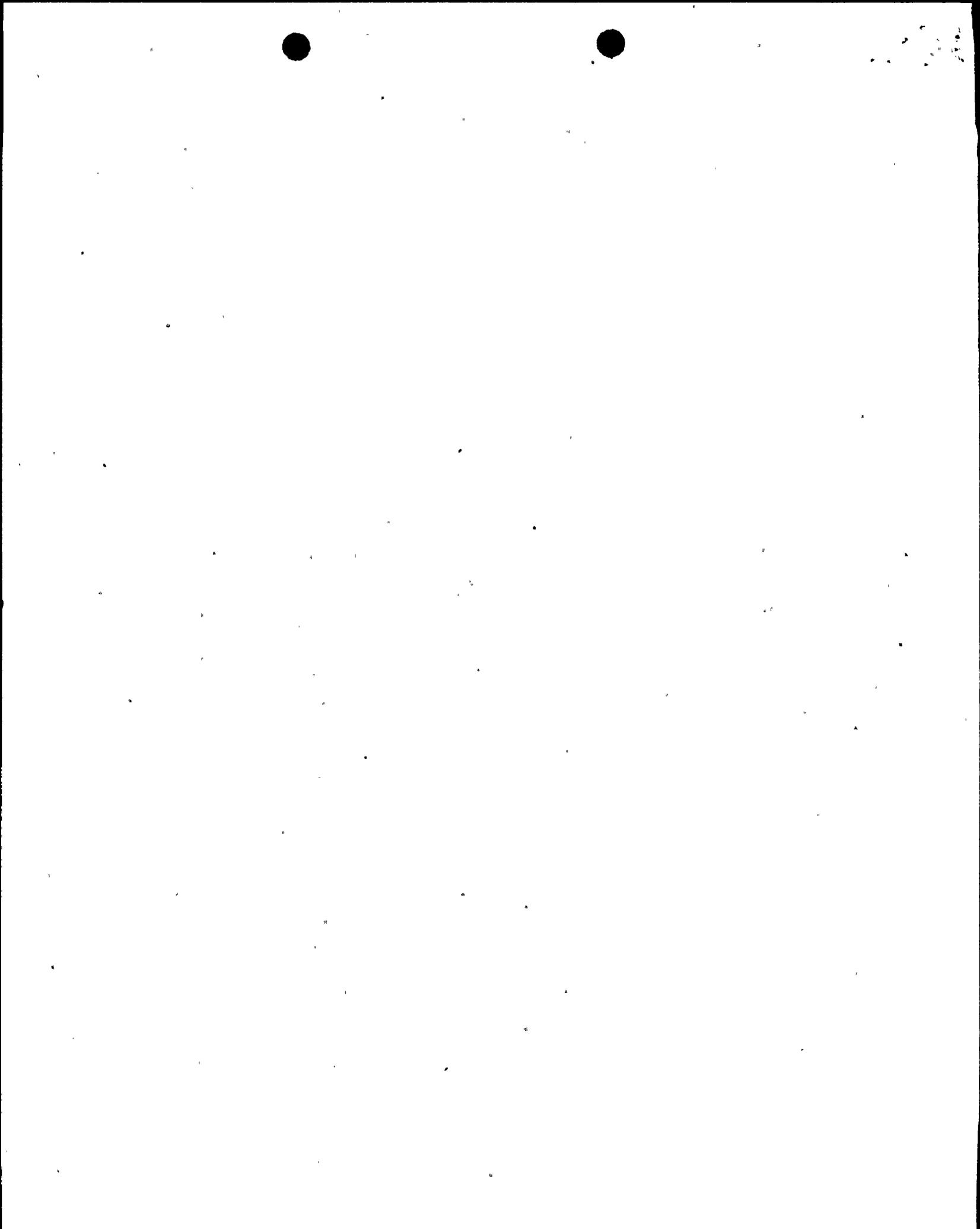
# R. E. GINNA STATION OPERATIONS AND TECHNICAL SECTIONS GROUP ORGANIZATIONS



6.2-7

Proposed

FIGURE 6.2 - 5



6.3 STATION STAFF QUALIFICATIONS

6.3.1 Each member of the facility shall meet or exceed the minimum qualifications of ANSI Standard N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel", as supplemented by Regulatory Guide 1.8, September 1975, for comparable positions, except for the Shift Technical Advisor,<sup>1</sup> and except for the Operations Manager who shall have held an NRC senior operator license for Ginna.

References

<sup>1</sup> Ltr. J. Maier (RG&E) to D. Crutchfield (NRC), dated December 30, 1980.



## Attachment B

The proposed change would delete the requirement that the station Operations Manager currently hold an NRC senior operator license and replace it with the requirement that the individual must have held an NRC senior operator license for Ginna. The Operations Supervisor, to whom the Shift Supervisors and operating personnel report, will still be required to maintain an NRC senior operator license. Thus, an individual on the management chain will still be required to maintain a license. The ANSI N18.1-1971 requirement is only that the Operations Manager should have a license only at the time of assuming the position. The proposed requirements would meet or exceed the intent of the requirement.

The advantages of the proposed change are that the Operations Manager will have more time to devote to managing the operating organization due to a reduced training commitment. In addition, the base of personnel who could fill the Operations Manager position will be broadened to include not only those currently holding a license but also those who have held a license.

The proposed change is acceptable since it will retain the necessary management knowledge and controls while improving the ability of the Operations Manager to manage the operating organization.

In accordance with 10 CFR 50.91, the proposed change to the Technical Specifications has been evaluated against three criteria to determine if the operation of the facility in accordance with the proposed amendment would:

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 change will not have an adverse impact as judged against these criteria.

The proposed Technical Specification change conforms to the intent of regulatory guidance and meets the Commission's example (vi) of amendments that do not involve a significant hazards consideration because the results of the change are within all acceptable criteria established by regulatory guidance. The proposed amendment does not involve any irreversible consequences.

Therefore, there is no undue risk to public health and safety and a finding of no significant hazards is warranted for the proposed Technical Specification change.

