



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 126 TO FACILITY OPERATING LICENSE NO. NPF-21

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

NUCLEAR PROJECT NO. 2

DOCKET NO. 50-397

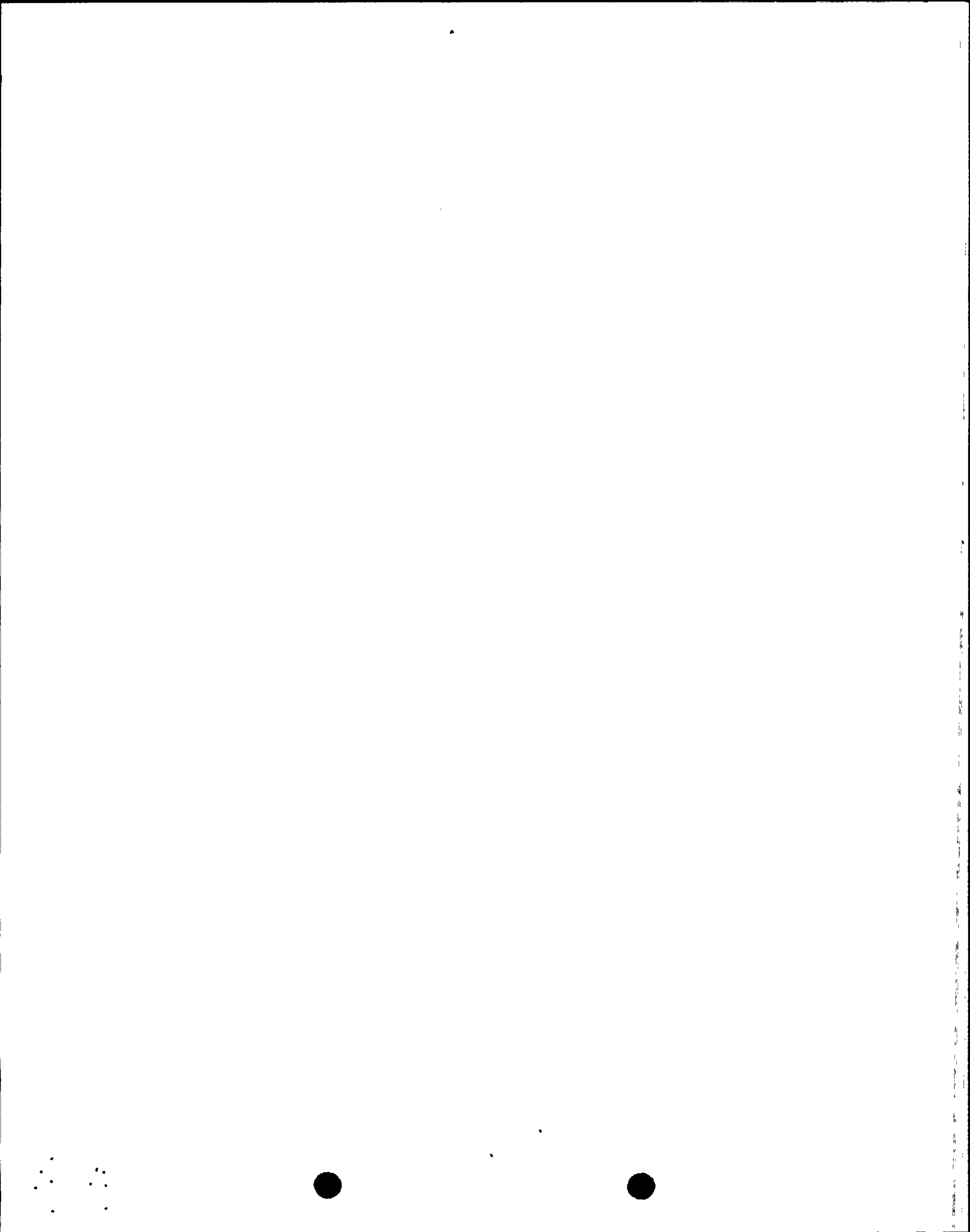
1.0 INTRODUCTION

By letter dated February 17, 1994, the Washington Public Power Supply System (the licensee) submitted a request for changes to the Technical Specifications (TS) for Nuclear Project No. 2. The proposed changes modify the administrative section of the technical specifications (TS) to reflect management and organizational changes at the WNP-2 facility. The proposed changes would (1) modify the reporting responsibility of the quality assurance organization from the Managing Director to the Assistant Managing Director, Operations (AMDO), and (2) modify the appointment authority for the Corporate Nuclear Safety Review Board (CNSRB) from the Managing Director to the AMDO. These changes are proposed to reflect the current designation of the AMDO as the licensee's designated official with corporate responsibility for overall plant nuclear safety and as the direct report for the CNSRB. In addition, the proposed change would (1) delete the specific requirement for health physics/chemistry program procedures, (2) modify the titles of two positions on the Plant Operations Committee (POC) to reflect revised organizational titles, (3) modify the CNSRB quorum requirements from nine personnel to a minimum of nine personnel, and (4) delete the requirement that the CNSRB Executive Secretary be designated from the CNSRB membership.

2.0 EVALUATION

2.1 Corporate Nuclear Safety Review Board (CNSRB)

The Assistant Managing Director for Operations (AMDO) is the designated nuclear official for the Supply System. As such, the person in this position is responsible for taking any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. The Corporate Nuclear Safety Review Board (CNSRB) is responsible for independent review and audit of Supply System nuclear and radiological safety policies and programs. Those licensee organizations responsible for the area audited are responsible for resolution of any deficiencies noted during audits. Amendment No. 118, dated September 8, 1993, revised the reporting responsibility of the CNSRB to the



AMDO rather than the Managing Director, primarily on the basis that the AMDO is the licensee's designated nuclear official.

The licensee proposes to make several changes in the details of composition of the CNSRB. First, the licensee proposes to change the number of members from nine to at least nine members. This would provide the licensee some flexibility in allowing a larger pool of individuals that would be available to meet the existing quorum requirements. TS 6.5.1.5 requires a quorum of at least 5 persons. The staff generally considers a quorum of a safety committee to comprise at least half the maximum membership. This requirement ensures consistency in the perspective provided by the committee. Since the licensee's proposal does not provide any upper limits on the number of CNSRB members, the staff considers the proposed change to be inconsistent with the current quorum requirements in TS 6.5.1.5 and unacceptable as proposed and justified.

Second, the licensee proposes to delete the requirement for designating an Executive Secretary from the CNSRB membership. This change would relieve one of the CNSRB members from the administrative details of the CNSRB and allow all members of the CNSRB to concentrate on the issues under consideration by the Board. The licensee has committed to retain the function of the Executive Secretary, to be assigned to a nonmember of CNSRB under the direction of the CNSRB Chairman. The staff finds this proposed change acceptable.

Third, the licensee proposes to change the authority for appointing CNSRB members from the current Managing Director to the AMDO. This change is consistent with Amendment No. 118, dated September 8, 1993, that made the CNSRB responsible to the AMDO, in the position as the designated corporate nuclear official. This would bring the authority for appointments for CNSRB membership in line with the AMDO's overall functional responsibility for the CNSRB. The staff finds the proposed change acceptable.

2.2 Quality Assurance Director Reporting Relationship

To reflect the AMDO's overall responsibility for nuclear safety at WNP-2, the licensee proposes to have the Quality Assurance and Engineering Directorate report directly to the AMDO instead of to the Managing Director. TS 6.2.1.e would be revised accordingly.

The staff has evaluated the proposed change in the reporting relationship of the QA organization. The QA Director position remains a corporate level position within the Supply System organization and as such is a position that is as high as the positions directly responsible for performing activities affecting quality. These positions are considered to be the Engineering Director and the Plant Manager. In addition, the level of the proposed position of the QA Director will allow the incumbent effective communications channels with persons in these positions. The other criteria from Standard Review Plan Section 17.2.1B1 are not affected by this change. The staff, therefore, considers the change acceptable.

2.3 Deletion of Technical Specification Reference to Health Physics/ Chemistry Support Program Procedures

The licensee proposes to delete the administrative TS that specifies that health physics/chemistry support program written procedures be established, implemented, and maintained. This change was proposed concurrently with a reorganization of the Health Physics/Chemistry Support Program activities.

Regulatory Guide (RG) 1.33, Revision 2, dated February 1978, "Quality Assurance Program Requirements (Operations)," contains a minimum list of procedures considered necessary to support plant operation. Section 7 (Procedures for Control of Radioactivity) and Section 10 (Chemical and Radiochemical Control Procedures) discuss procedures that address Health Physics and Chemistry Control procedures, and the current TS could be considered redundant to the existing discussion in RG 1.33. The licensee stated in its February 17, 1994, submittal that the establishment and approval of program procedures will be performed by the Plant Operations Committee (POC) and the Plant Manager (PM), since the procedures are discussed in RG 1.33. The Supply System committed to RG 1.33 in TS 6.8.1, and TS 6.8.2 requires POC and PM review and approval of the procedures identified in TS 6.8.1. The staff, therefore, finds deletion of the Health Physics/Chemistry Support Program item from TS 6.8.1 acceptable.

2.4 Plant Operations Committee Composition

The licensee proposed to change the title of two positions listed in TS 6.5.1.2, POC Composition. "Administrative Manager" would be changed to "Administration and Records Management Manager," and "Plant QA Manager" to "Quality Assessments Division Manager." These changes are administrative in nature and reflect a proposed change in scope of responsibility for these two management positions. The responsibilities for Plant Administration and Plant QA remain unchanged with respect to the responsibilities of these two positions on the POC. These changes are, therefore, acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Washington State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the 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 the amendment.



5.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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