



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 40 TO FACILITY OPERATING LICENSE NO. NPF-41,
AMENDMENT NO. 27 TO FACILITY OPERATING LICENSE NO. NPF-51
AND AMENDMENT NO. 16 TO FACILITY OPERATING LICENSE NO. NPF-74
ARIZONA PUBLIC SERVICE COMPANY, ET. AL.
PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3
DOCKET NOS. STN 50-528, STN 50-529, AND STN 50-530

1.0 INTRODUCTION

By letter dated August 25, 1988, as supplemented by letter dated October 18, 1988, the Arizona Public Service Company (APS) on behalf of itself, the Salt River Project Agricultural Improvement and Power District, Southern California Edison Company, El Paso Electric Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority (licensees), requested changes to the Technical Specifications for the Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (Appendix A to Facility Operating License Nos. NPF-41, NPF-51, and NPF-74, respectively). The proposed changes would delete Technical Specification Figures 6.2-1 "Offsite Organization" and 6.2-2 "Onsite Organization". Technical Specification 6.2.1 would be changed to add general requirements that capture the essential aspects of the organizational structure that are defined by the existing onsite and offsite organization charts.

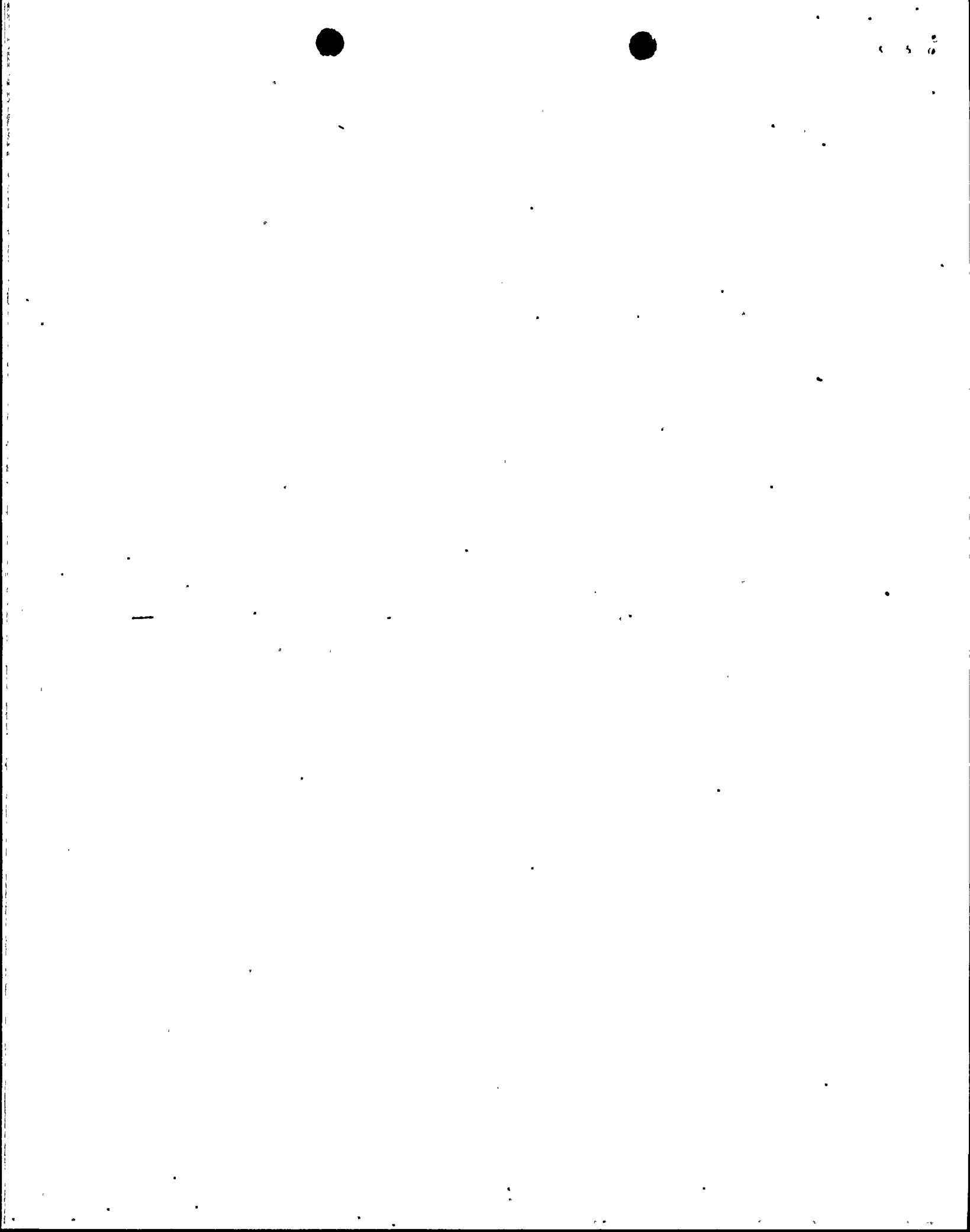
2.0 DISCUSSION

The NRC staff has evaluated the proposed changes and has concluded that they are acceptable. The staff's evaluation is given below.

The content required in the Administrative Controls Section of the Technical Specifications is specified in 10 CFR §50.36.c(5). That provision requires that the technical specifications contain provisions relating to organization and management procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner. It does not specifically require inclusion of organizational charts in the technical specifications.

In Generic Letter (GL) 88-06, "Removal of Organizational Charts from Technical Specification Administrative Controls Requirements" dated

8811030193 881025
PDR ADOCK 05000528
P PDC



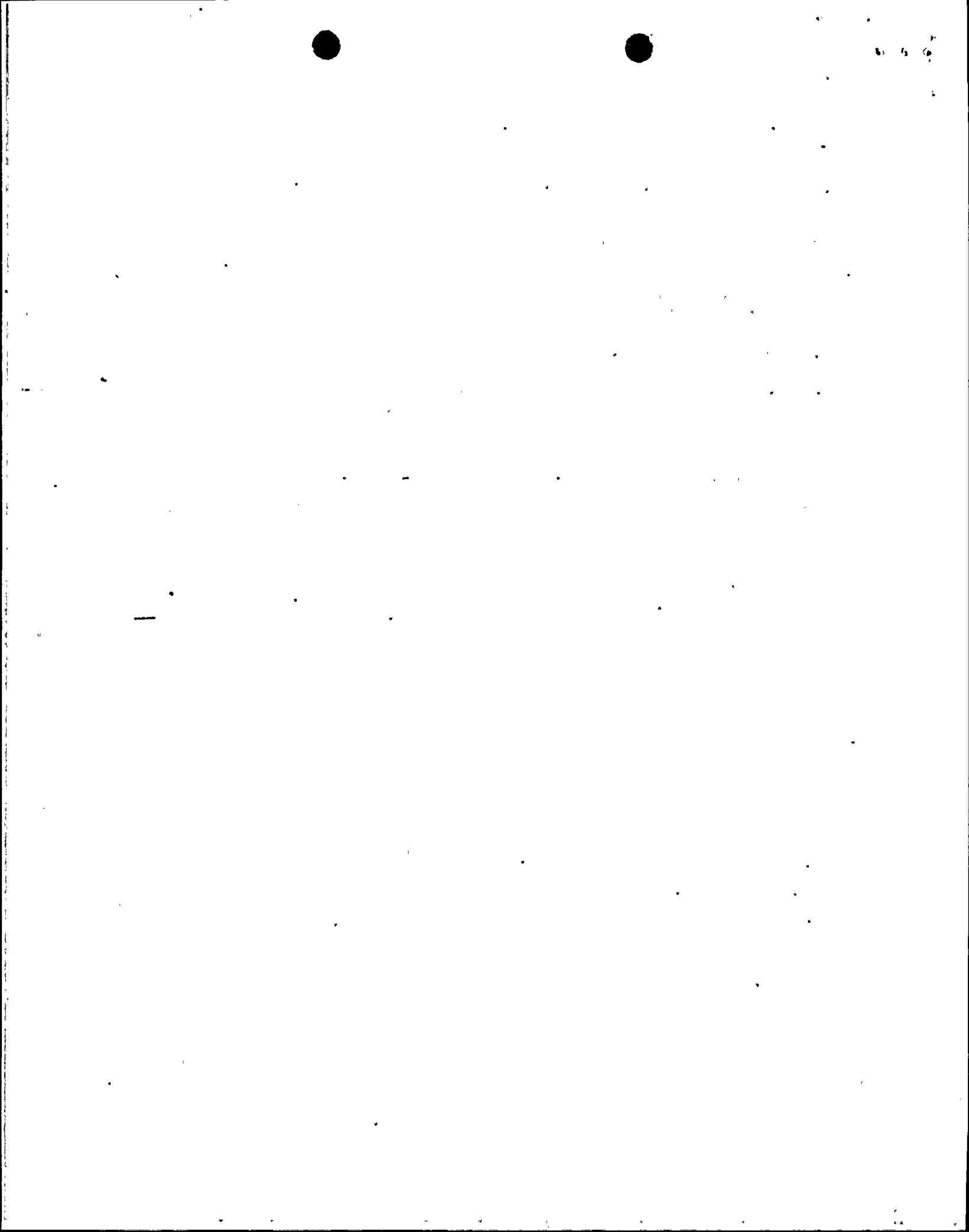
March 22, 1988, the NRC provided guidance for the removal of organization charts from the TS. Generic Letter 88-06 concludes that the removal of organization charts from the technical specifications will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure.

With regard to Palo Verde, the licensee states that removal of the organization charts from the technical specifications will not affect plant operations. Having organization charts in the technical specifications duplicates those charts listed in Chapter 13 of the PVNGS FSAR.

As in the past, the NRC will continue to be informed of organizational changes and management personnel titles through other required controls. For example, 10 CFR §50.34(b)(6)(i) requires that the applicant's organizational structure be included in the FSAR. Consistent with GL 88-06, Section 13.1 of the Updated FSAR currently provides a functional description of the organization, a functional description of key personnel positions, and detailed organization charts. The organization charts in the Updated FSAR are more detailed than those presently in the technical specifications. As required by 10 CFR §50.71(e), the licensee submits annual revisions to the Updated FSAR.

The removal of the organization charts and title changes represent no reduction in the current safety requirements, because the following conditions are included in the technical specifications by these amendments, per the recommendations of GL 88-06:

- 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. These organizational charts will be documented in the FSAR and updated in accordance with 10 CFR §50.71(e).
- b. There shall be an individual executive position (Executive Vice President ANPP) 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 in the plant so that continued nuclear safety is assured.
- c. There shall be individual management positions (Plant Managers) in the onsite organization having responsibility for overall unit safe operation and having 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 health physics and quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.



Additionally the recommendation in GL 88-06 to designate those positions in the onsite organization that require a senior reactor operator or reactor operator license is currently covered by Technical Specification 6.3.1 "Unit Staff Qualifications". This specification is not changed by the proposed amendments.

As discussed above, because removal of licensee organization charts from the PVNGS TS meets the requirements of 10 CFR § 50.36, and because these amendments meet the guidelines of GL 88-06, the NRC staff finds them acceptable.

3.0 CONTACT WITH STATE OFFICIAL

The Arizona Radiation Regulatory Agency has been advised of the proposed determination of no significant hazards consideration with regard to these changes. No comments were received.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in administrative procedures and requirements. Accordingly, these amendments meet 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 these amendments.

5.0 CONCLUSION

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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public. We, therefore, conclude that the proposed changes are acceptable.

Principal contributor: M. Davis

Dated: October 25, 1988

