

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 39 TO FACILITY OPERATING LICENSE NO. NPF-41,

AMENDMENT NO. 26 TO FACILITY OPERATING LICENSE NO. NPF-51

AND AMENDMENT NO. 15 TO FACILITY OPERATING LICENSE NO. NPF-74

PALO VERDE NUCLEAR GENERATING STATION, UNIT NOS. 1, 2 AND 3

DOCKET NOS. STN 50-528, STN 50-529 AND STN 50-530

ARIZONA PUBLIC SERVICE COMPANY, ET AL.

#### 1.0 INTRODUCTION

By letter dated September 6, 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 a change 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 revise Specification 6.3.1, Unit Staff Qualifications, to modify the Senior Reactor Operator (SRO) license requirements for the Operations Manager.

### 2.0 EVALUATION

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

Technical Specification 6.3.1 currently requires each member of the unit staff to meet or exceed the minimum qualifications of ANS 3.1-1978 and Regulatory Guide 1.8, September 1975. Section 4.2.2 of ANS 3.1-1978 specifies that "At the time of initial core loading or appointment to the position, whichever is later, the operations manager shall hold a Senior Reactor Operator's license..." The standard does not address the question of whether the operation manager needs to maintain that SRO license while he continues to serve as operations manager.

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The 1981 version of ANS 3.1 specifies that the Operations Manager is to obtain and hold an SRO license. The 1987 version of ANS 3.1 makes the following statement: "If the Operations Manager does not hold an NRC License, then the Operations Middle Manager shall hold an NRC Senior Operator's License." This statement takes into account the growth in size of the Operations department in some licensee organizations. It allows the Operations Manager to not hold a license if there is an SRO licensed operations middle manager position in direct line between the operations manager and the licensed shift operators.

The proposed amendment modifies the SRO license requirements for the Operations Manager by requiring that either he or the Operations Supervisor hold a valid SRO license. The proposed change also requires that the individual who holds the SRO license would direct the licensed activities of the licensed operators, as required by 10 CFR 50.54(1).

In the amendment request the licensee stated that the administrative duties associated with the Operations Manager position consist of many tasks not associated with the direction of the licensed activities of the licensed operators. The licensee is providing an Operations Supervisor to assist the Operations Managers in each unit to fulfill all the responsibilities of the position. The proposed change would allow one of the individuals to be exempt from the requirement to have an SRO license, but still maintain an individual who meets the requirements to comply with—10 CFR 50.54(1). The licensee stated that the proposed change would enhance safe operation of the plants since more management attention could be focused on plant activities.

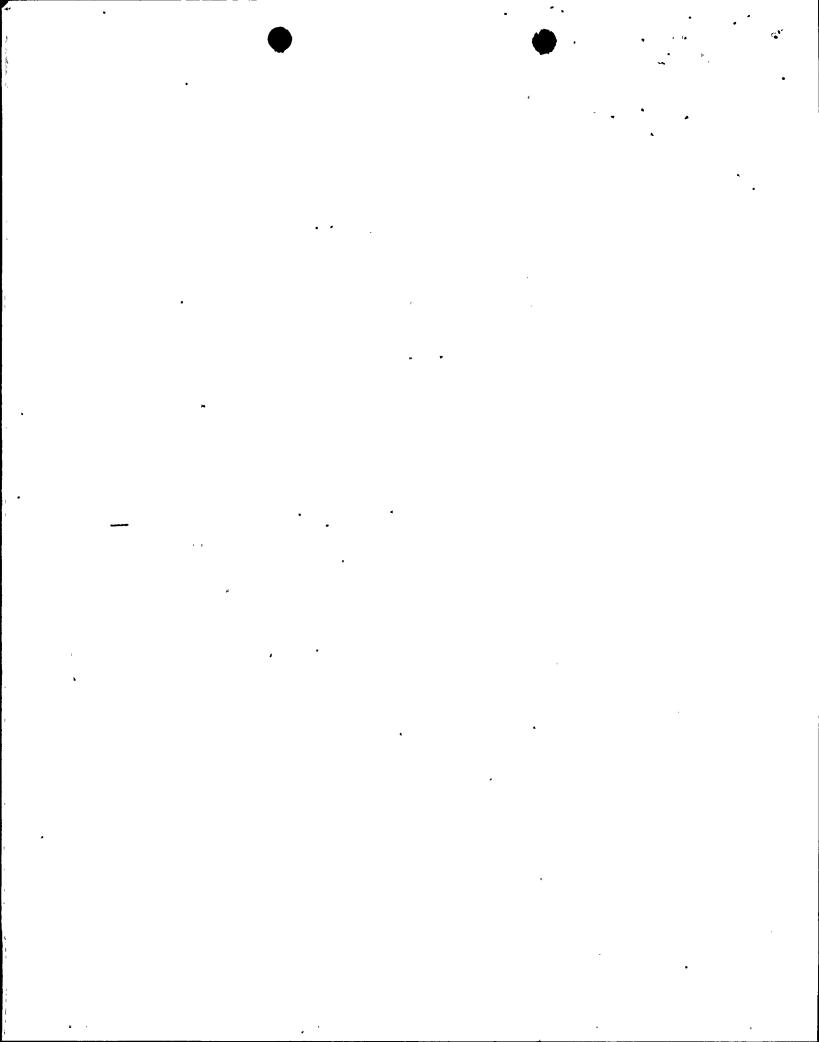
The staff agrees with the licensee's assessment. Since the more recent revision (1987) of ANS 3.1 specifically allows the Operations Manager to not hold a license when an Operations Middle Manager SRO licensed position exists, the staff finds these amendments acceptable.

#### 3.0 CONTACT WITH STATE OFFICIAL

The Arizona Radiation Regulatory Agency was advised of the proposed determination of no significant hazards consideration with regard to this change. No comments were received.

#### 4.0 ENVIRONMENTAL CONSIDERATIONS

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 these 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 24, 1988

