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RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to Licesnes DPR-58 & DPR-74 changing Tech Spec Figure 6.2.2 re facility organization by deleting senior operator license from operations superintendent licesned functions.

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April 18, 1983
AEP:NRC:0659A

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
TECHNICAL SPECIFICATION CHANGE REQUEST
FACILITY STAFF REQUIREMENTS

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

This letter amends one of the Technical Specification (T/S) change requests contained in our letter No. AEP:NRC:0659, dated March 29, 1982. More specifically, Change No. 3 of that letter requested that a new specification (T/S 6.3.2) be issued to accommodate the situation of the then new Cook Plant Operations Superintendent. The previously proposed T/S 6.3.2 would have allowed a "full time assistant" holding a SRO license to perform the Operations Superintendent's "licensed functions." In this letter we are requesting, first, a change to T/S Figure 6.2.2 (Facility Organization) by deleting the SOL (Senior Operator License) in the Operations Superintendent's identification box. Secondly, we are requesting a change to T/S 6.3.1 to include the statement "and (3) the Operations Superintendent who shall not be required to hold a Facility Senior Reactor Operator's License."

The Attachment to this letter contains the revised T/S pages. It should be noted that the attached amended pages reflect the changes being proposed in this letter, as well as those changes previously proposed in our letter No. AEP:NRC:0659. All changes are indicated by vertical bars on the right hand margin of the page.

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Presently, our Operations Superintendent, who has previously held a SOL at another facility, does not have his SOL for our Plant. He is scheduled to acquire his SOL for our Plant prior to October 1, 1983. However, upon review of the current T/S requirement we feel that

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the requirement is unduly restrictive and in conflict with normal managerial prerogatives which are used to assure the quality of our supervisory personnel. This argument has been recently supported by an Oak Ridge study (as described in the October 18, 1982, issue of INSIDE NRC) which surveyed the nuclear industry (including NRC personnel) on the subject of managerial licensing. This study depicted a strong opposition to the enforcement of managerial licensing, and supported instead to have the NRC encourage the industry to assure managerial quality by establishing standards on the recruitment, training, and assessment of managers. Furthermore, Revision 3 to NUREG-0452 ("Standard Technical Specifications for Westinghouse Pressurized Water Reactors") does not require that the facility's Operations Superintendent be the holder of a SOL. We believe, based on all of the above, that the requested T/S changes will not degrade the quality of management at the Cook Plant and will not endanger the health and safety of the public.

We interpret the proposed T/S changes to constitute Class I and Class II Amendments. Therefore, we have enclosed a check for one thousand six hundred dollars ($1,600).

These proposed changes have been reviewed by the Plant Nuclear Safety Review Committee (PNSRC) and will be reviewed by the Nuclear Safety and Design Review Committee (NSDRC) at its next meeting.

This document has been prepared following Corporate Procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

R. F. Hering
Vice President

cc: John E. Dolan - Columbus
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R. C. Callen
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NRC Resident Inspector at Cook Plant - Bridgman