



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 122 TO FACILITY OPERATING LICENSE NO. DPR-72

FLORIDA POWER CORPORATION, ET AL.

CRYSTAL RIVER UNIT NO. 3 NUCLEAR GENERATING PLANT

DOCKET NO. 50-302

INTRODUCTION

By letter dated July 26, 1989, Florida Power Corporation (FPC or the licensee) proposed changes to Technical Specifications (TS) 6.2.1, Offsite Organizations, and 6.2.2, Unit Staff. The proposed changes would remove Figure 6.2-1, Corporate Organization, and Figure 6.2-2, Facility Organization, and replace them with a narrative description of the offsite and onsite organizations' functional requirements in TS 6.2.1 and 6.2.2, respectively. Guidance for these proposed changes to the TS was provided to licensees and applicants by Generic Letter 88-06 dated March 22, 1988.

The amendment would also allow for revision of the composition of the Plant Review Committee by replacing the requirement that its members have specific job titles with a more general requirement that they be supervisors from various disciplines. This issue was not addressed in the Generic Letter.

BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 6.2.1 and 6.2.2 of the administrative control requirements have referenced offsite and unit onsite organization charts that are provided as figures to these sections. On a plant-specific basis, these organization charts have been provided by applicants and included in the TS issued with the operating license. Subsequent restructuring of either the offsite or unit onsite organizations, following the issuance of an operating license, has required licensees to submit a license amendment for NRC approval to reflect the desired changes in these organizations.

Because of these limitations on organizational structure, the nuclear industry has highlighted this as an area for improvement in the TS. The Shearon Harris licensee proposed changes to remove organization charts from its TS under the lead-plant concept. The proposed changes were endorsed by the Westinghouse Owners Group. In its review of the Shearon Harris proposal, the staff concluded that most of the essential elements of offsite and onsite organization charts are captured by other regulatory requirements, notably Appendix B to 10 CFR 50; however, there were aspects of the organizational structure that are important to ensure that the administrative control requirements of 10 CFR 50.36 would be met and that would not be retained with the removal of the organizational

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charts. The applicable regulatory requirements are those administrative controls that are necessary to ensure safe operation of the facility. Therefore, those aspects of organization charts for Shearon Harris that were essential for conformance with regulatory requirements were added (1) to Specification 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to Specification 6.2.2 to define qualification requirements of the unit staff.

By letter dated January 27, 1988, the staff issued Amendment No. 3 to Facility Operating License NFP-63 for the Shearon Harris Nuclear Power Plant that incorporated these changes to their TS. Subsequently the staff developed guidance on an acceptable format for license amendment requests to remove the organization charts from the TS. Generic Letter 88-06 provided this guidance to all power reactor licensees.

#### EVALUATION

The licensee's proposed changes to its TS are in accordance with the guidance provided by Generic Letter 88-06 and address the items listed below.

- (1) Specifications 6.2.1 and 6.2.2 were revised to delete the references to Figures 6.2-1 and 6.2-2, which were removed from the TS.
- (2) Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.2.1, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in the Final Safety Analysis Report.
- (3) The senior reactor operator and reactor operator license qualified positions of the unit staff were added to Specification 6.2.2. Therefore, this requirement, which was identified on the organization chart for the unit staff, will be retained.
- (4) Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee has confirmed that this documentation currently exists in the Final Safety Analysis Report.
- (5) The licensee has confirmed that no specifications, other than those noted in item (1) above, include references to the figures of the organization charts that are being removed from TS for their plant. Hence, this is not an applicable consideration with regard to the need to redefine referenced requirements as a result of the removal of these figures.

The deletion of the specific titles for members of the Plant Review Committee is considered to be administrative in nature, as a requirement for supervisors from various disciplines to compose this Committee has been added to the TS. The details of the specific job titles of the Plant Review Committee members will be located in administrative procedures. Changes to these procedures are made in accordance with 10 CFR 50.59.

On the basis of its review of the above items, the staff concludes that the licensee has provided an acceptable response to these items as addressed in the NRC guidance on removing organization charts from the administrative control requirements of the TS. Furthermore, the staff finds that these changes are consistent with the staff's generic finding on the acceptability of such changes as noted in Generic Letter 88-06. Accordingly, the staff finds the proposed changes to be acceptable.

#### ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in record keeping, 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 these amendments.

#### CONCLUSION

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

#### Principal Contributors:

T. Dunning  
G. Kunder

Dated: October 10, 1989