

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

J. EDWARD HOWARD  
VICE PRESIDENT  
NUCLEAR



June 8, 1981

BECo. Ltr. #81-126

Proposed Change #81-03

Mr. Thomas A. Ippolito, Chief  
Operating Reactors Branch #2  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

License No. DPR-35  
Docket No. 50-293

Proposed Administrative Technical Specification Change

Dear Sir:

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Boston Edison Company hereby proposes the following modifications to Appendix A of Operating License No. DPR-35.

Proposed Change

As a result of a recent reorganization, changes to Section 6.0 Administrative Controls of the PNPS Technical Specifications are required to reflect the reassignment of responsibilities as described below and shown in the accompanying attachments.

The position of Watch Engineer has been restructured to report directly to the Deputy Nuclear Operations Managers. We will now require that individuals who function as Watch Engineers, meet the qualification requirements specified in N18.1-1971 for the position of Operations Manager.

The Chief Operating Engineer position has been deleted and a Day Watch Engineer position has been added. We propose to change Technical Specification 6.5A2 to substitute the Day Watch Engineer for the Chief Operating Engineer as a member of the ORC. The individual functioning as the Day Watch Engineer shall also be required to meet the qualifications prescribed in N18.1-1971 for the position of Operations Manager.

The position of On Site Safety & Performance Group Leader, formally the Staff Assistant, Nuclear Safety, has been structured and included as a member of the ORC. Reporting to the Safety & Performance Group Leader are the Shift Technical Advisors and Performance Engineers.

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### Reason for Change

With the increased emphasis on the on-site management of operating nuclear power plants on a 24 hour per day basis the position of the Watch Engineer has been restructured to report directly to the Deputy Nuclear Operations Manager. This change allows direct access to top station management which has direct access to all corporate support and emphasizes the responsibility of the Watch Engineer for safe operation of the plant under all conditions and the authority vested in the Watch Engineer position by Corporate management.

This change also firmly establishes throughout the organization the expectations of upper management when supporting groups are requested/required to respond to meet the needs of the Watch Engineer.

The Day Watch Engineer position has been established to provide an additional resource with operational expertise to assist in effective management planning and work control for the station. The Day Watch Engineer will review proposed revisions to station procedures, will review proposed changes and modifications to plant systems or equipment, investigate potential violations of Technical Specifications, review facility operations to detect potential deficiencies and assess operational status of plant. The Day Watch Engineer will participate in the routine scheduled staff meetings and will participate as a member of ORC. The Day Watch Engineer will report directly to the Deputy Nuclear Operations Manager to provide ready access to station management and to provide objectivity in the performance of his operations assignments.

Individual Watch Engineers selected for the Day Watch Engineers position will be rotated through this function on an approximate six month frequency which will ultimately provide greater depth and understanding for all Watch Engineers of the overall management activities performed with the station and through this developmental experience we expect to strengthen the management and operational capabilities of all Watch Engineers.

The formal structuring of the Safety & Performance function and the inclusion of its Group Leader as a member of the ORC will also emphasize the Organizations' commitment to the systematic review of plant performance and operational safety and provide an added dimension for feedback of operation experience to the ORC for improving plant safety. The inclusion of the Shift Technical Advisors in the Group assures timely access to station operating experience while enhancing communications between the STA's on-watch and the performance engineering staff on days.

### Safety Considerations

The proposed changes affect only the Administrative Control Section of the Technical Specifications and therefore do not contain any safety related concerns. The structural format has been established to provide for clear lines of authority while providing independence from operating pressures and emphasizing the assignment of responsible upper level management positions. These changes have been reviewed by the Nuclear Safety Review and Audit Committee and have been reviewed and approved by the Operations Review Committee.

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Schedule for Change

The BECo proposes that these changes be effective and fully implemented within thirty days of receipt from the Commission.

Fee Determination

Boston Edison Company proposes that pursuant to 10 CFR 170 this is a Class III Amendment and accordingly a check for \$4,000 is enclosed.

Should you have any questions or concerns regarding this matter please do not hesitate to contact us.

Very truly yours,

*J. Edward Howard*

Attachments

3 signed originals and 37 copies

Commonwealth of Massachusetts )  
County of Suffolk )

Then personally appeared before me J. Edward Howard, who, being duly sworn, did state that he is Vice President - Nuclear of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: *July 6, 1984*

*Dorothy M. Lopez*  
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Notary Public