

ENCLOSURE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

_____)	Docket No. 50-133
In the Matter of)	Facility Operating License
)	No. DPR-7
PACIFIC GAS AND ELECTRIC COMPANY)	License Amendment Request
)	No. 90-01
Humboldt Bay Power Plant)	
Unit 3)	
_____)	

Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company (PG&E) hereby applies to amend its Humboldt Bay Power Plant (HBPP) Facility Operating License No. DPR-7 (License).

The proposed changes amend the Technical Specifications (Appendix A of the License) as regards Section VII, Administrative Controls.

Information on the proposed changes is provided in Attachments A and B.

These changes have been reviewed and are considered not to involve a significant hazards consideration as defined in 10 CFR 50.92 or require an environmental assessment in accordance with 10 CFR 51.22(b). Further, there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changed.

Subscribed to in San Francisco, California this 18th day of January 1990.



Respectfully submitted,
Pacific Gas and Electric Company

By J. D. Shiffer
J. D. Shiffer
Vice President
Nuclear Power Generation

Howard V. Golub
Richard F. Locke
Attorneys for Pacific
Gas and Electric Company

Subscribed and sworn to before me
this 18th day of January 1990

By Richard F. Locke
Richard F. Locke

B. E. Zelnik
Bianca E. Zelnik, Notary Public
for the City and County of San Francisco
State of California

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Attachment A

ADMINISTRATIVE CONTROLS
REMOVAL OF ORGANIZATION CHARTS,
MANAGEMENT TITLE CHANGES
AND GONPRAC CHANGES

A. DESCRIPTION OF AMENDMENT REQUEST

This License Amendment Request (LAR) proposes to revise the Humboldt Bay Power Plant Unit 3 Technical Specifications to incorporate organizational changes into Section VII "Administrative Controls." The specific Technical Specification (TS) changes proposed are as follows:

1. Section VII.B and C to remove Figure VII-1, "Offsite Organization" and Figure VII-2, "Plant Staff Organization." General requirements that address the essential aspects of the organizational structure that are defined by the existing organization charts are added. This LAR also proposes to change the titles of certain Plant Staff Review Committee members in Administrative Controls Section.

A similar request was made for our Diablo Canyon Units 1 and 2 (DPR-80 and DPR-82). This was approved by the NRC on July 25, 1988, in Amendments 29 and 28 in their respective licenses.

2. Section VII.D.2.a, "General Office Nuclear Plant Review and Audit Committee Purpose," would be revised to change the requirement to report and advise the President on those areas of responsibility specified in Items 2.g and 2.h to the Vice President, Nuclear Power Generation. A similar request was made for our Diablo Canyon Units 1 and 2 (DPR-80 and DPR-82). This was approved by the NRC on December 4, 1989 in Amendments 47 and 46 of their respective licenses.
3. Section VII.D.2.b, "General Office Nuclear Plant Review and Audit Committee Composition," would be revised to change the Chairman from Vice President, Nuclear Power Generation, to Manager, Nuclear Safety Assessment and Regulatory Affairs; change the Vice Chairman from Assistant to the Vice President, Nuclear Power Generation, to Manager, Nuclear Operations Support; delete the Director, Nuclear Administration and Support Services, as a GONPRAC member and add the Plant Manager, Diablo Canyon Power Plant as a GONPRAC member. These changes are consistent with the NPG organizational changes made to consolidate and strengthen activities related to independent technical assessments of plant safety.

A similar request was made for Diablo Canyon Units 1 and 2 (DPR-80 and DPR-82). This was approved by the NRC on December 4, 1989 in Amendments 47 and 46 of their respective licenses.

These proposed changes are noted in the marked-up copy of the applicable TS provided in Attachment B.

B. JUSTIFICATION

The proposed change to remove the organizational charts from the Technical Specifications is a result of the NRC guidance provided in Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Controls Requirements," dated March 22, 1988.

The NRC has concluded 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. Further, the content of the Administrative Controls Section of the Technical Specifications is specified in 10 CFR 50.36.c(5). That paragraph requires only 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 and does not specifically require inclusion of organizational charts in the Technical Specifications.

Previous organization changes have required PG&E to submit LARs and the NRC to approve these requests prior to implementing a change to the structure of an offsite or onsite organization. Consistent with the NRC and industry commitment to improve Technical Specifications, PG&E proposes to remove the organization charts from the Technical Specifications. Removal of the organization charts will eliminate unnecessary expenditure of resources for both organizations. This LAR is consistent with the guidance provided in Generic Letter 88-06 for removal of organization charts from the Technical Specifications.

The proposed changes in the GONPRAC composition reflect NPG organizational changes made to further strengthen and consolidate activities related to independent technical assessments of plant safety and interface with nuclear regulatory agencies. The NPG organizational changes are a part of PG&E's continuing effort and commitment to improve the effectiveness, efficiency, and safety of its nuclear operations.

Changes to the titles of President and Vice President, Nuclear Power Generation, reflect that the proposed GONPRAC Chairman reports to the Vice President, Nuclear Power Generation, and (2) that the Vice President, Nuclear Power Generation is therefore the more appropriate recipient, rather than the President, of GONPRAC reports and advice.

C. SAFETY EVALUATION

Removal of the organization charts from the Technical Specifications does not affect plant operations. Specific operational requirements are detailed in other Technical Specifications that bear more directly on operational safety than the organization charts. The change to the titles of certain management personnel does not change the number of members, composition, or function of the Plant Staff Review Committee. The revision is administrative in nature.

The removal of the organization charts and title changes represent no reduction in the current safety requirements, as the following conditions will be included in the Technical Specifications:

- (1) A requirement that 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 organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or equivalent forms of documentation.
- (2) Designation of an executive position that has corporate responsibility for overall plant nuclear safety and authority to take such measures as may be needed to ensure acceptable performance of staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- (3) Designation of a management position in the onsite organization that is responsible for overall unit operation and has control over those onsite activities necessary for safe operation and maintenance of the plant.
- (4) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license.
- (5) Provisions of sufficient organizational freedom to be independent of operational pressures to those individuals who perform the functions of health physics, quality assurance, and training of operating staff.

The organization information described above is contained in the Vice President, Nuclear Power Generation Department Procedures.

Based upon the information provided above, PG&E believes that there is reasonable assurance that the health and safety of the public will not be adversely affected by title changes and removing the organization charts from the Technical Specifications.

The changes in GONPRAC composition are administrative in nature and are expected to improve the effectiveness and quality of the safety overview function provided by this committee, consistent with NPG organizational changes.

D. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazards considerations involved with the proposed amendment, focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for

a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The following evaluation is provided for the no significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes are administrative in nature and do not affect the probability or consequences of any accident identified in the SAFSTOR Decommissioning Plan or the function of the Plant Staff Review Committee.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes are administrative in nature and do not affect any plant systems, plant operations, or the type of accidents that might occur at Humboldt Bay.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed changes are administrative in nature and do not affect margin of safety.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

E. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

In conclusion, based on the above evaluation, PG&E submits that the activities associated with this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

F. ENVIRONMENTAL EVALUATION

Pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required because the amendment concerns changes in administrative procedures and requirements. The change qualifies for categorical exclusion per 10 CFR 51.22(c)(10).

Furthermore, PG&E has evaluated the proposed changes and determined that the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure.