

VERMONT YANKEE NUCLEAR POWER CORPORATION

PROPOSED CHANGE #157



Ferry Road, Brattleboro, VT 05301-7002

BVY 90-023

REPLY TO
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

March 2, 1990

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to All Reactor Licensees and Applicants,
Generic Letter 88-06, dated 3/22/88
c) Yankee Operational Quality Assurance Manual (YOQAP-1A)

Attachment: A) Vermont Yankee Plant Organization

Dear Sir:

Subject: Administrative Update to the Vermont
Yankee Technical Specifications

Pursuant to Section 50.59 of the Commission's Rules and Regulations, Vermont Yankee Nuclear Power Corporation hereby proposes the following modification to Appendix A of the Operating License.

Proposed Change

The proposed change involves the deletion of the organizational charts in accordance with Reference b) and other associated minor changes. These changes are reflected on the attached revisions to pages 190, 190a, 191, 192, 194, 195, 196, and 206.

Reason and Basis for Change

Generic Letter 88-06 [Reference b)] concludes that organization charts by themselves do not ensure compliance to the administrative control requirements of 10CFR50.36. Specific requirements are already specified elsewhere in the Technical Specifications which bear more directly on operational safety and management functions.

For Vermont Yankee, the control room command function, the requirements for minimum staffing, the management functions for independent safety review and on-site review groups are all specifically addressed in the

9003090014 900302
PDR ADDCK 05000271
P PNU

A001
1/1

U.S. Nuclear Regulatory Commission
March 2, 1990
Page 2

current Vermont Yankee Technical Specifications. The appropriate organization charts, job descriptions and other necessary organizational information will be incorporated into the Yankee Operational Quality Assurance Manual (YOQAP-1A), in accordance with the provisions of Generic Letter 88-06. Additionally, the responsibility for selection of members to the Nuclear Safety Audit and Review Committee will be delineated in the Yankee Operational Quality Assurance Manual.

Safety Considerations

This proposed change is administrative in nature and has no safety or environmental significance. The deletion of the organization chart from the Technical Specifications does not have an adverse effect on safety. Although these items will no longer be detailed in the Technical Specifications, the details will be included in the Yankee Operational Quality Assurance Manual.

This change has been reviewed by the Plant Operations Review Committee (PORC) and the Vermont Yankee Nuclear Safety and Audit Review Committee (NSARC).

Significant Hazards Consideration

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples [48FR14870]. The examples of actions involving no significant hazards include: (i) a purely administrative change to Technical Specifications, for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature.

This Technical Specification proposed change is considered an administrative change and does not involve significant hazards considerations, as stated below.

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because deletion of the organization charts, and position titles from the Technical Specifications does not affect plant operation. As in the past, the NRC will continue to be informed of organizational changes through other controls.

Appendix B to 10CFR Part 50 and 10CFR50.54(a)(3) govern changes to the Quality Assurance Program, including organizational changes. Some of

U.S. Nuclear Regulatory Commission
March 2, 1990
Page 3

these organizational changes may require prior NRC approval. Also, it is Vermont Yankee's practice to inform the NRC of organizational changes affecting the nuclear facilities prior to implementation.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed change is administrative in nature, and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.

- 3) Involve a significant reduction in a margin of safety.

The proposed amendment does not involve a significant reduction in a margin of safety because Vermont Yankee, through its Quality Assurance Program, is committed to maintaining the qualified personnel in positions of responsibility. Therefore, removal of the organization charts from the Technical Specifications will not affect the margin of safety.

Based on the above, we have concluded that this change does not constitute a significant hazards consideration, as defined in 50.92(c), since this change is administrative in nature. This change is in full compliance with current federal regulations.

Schedule of Change

This proposed change will be incorporated into the Vermont Yankee Technical Specifications as soon as practical upon receipt of your approval.

Additionally, based on a thorough evaluation of the current plant organization, Vermont Yankee intends to realign the plant management structure [Attachment A] effective March 15, 1990. The Operations, Maintenance, and Instrument and Control departments will report to the Operations Superintendent and the Radiation Protection, Chemistry, Reactor and Computer Engineering, and Engineering Support departments will report to the Technical Services Superintendent. We have concluded that these changes will result in a more efficient and streamlined structure that will enable Vermont Yankee to function more effectively. Specifically, the change will more closely align the Maintenance and Instrument and Control functions with the Operations department so that the maintenance resource is optimized for both day-to-day and long-term plant operation.

ATTACHMENT A VERMONT YANKEE NUCLEAR POWER CORPORATION PLANT ORGANIZATION

