



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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LICENSEE: Siemens Power Corporation (SPC)
Richland, Washington

SUBJECT: SAFETY EVALUATION REPORT: APPLICATION DATED DECEMBER 10, 1993, RE
PERSONNEL CHANGES AND EQUIPMENT CHANGE PROCESS

Background

By letter dated May 6, 1993, Siemens Power Corporation (SPC) notified NRC of changes to personnel staffing at the Richland plant, and a change to the Engineering Change Notice procedure described in Section 11.6 of the Safety Demonstration. On June 15, 1993, the licensee revised the submitted documents to correct page numbering for the current license and the renewal application. The licensee stated that these were changes to the Safety Demonstration of the license application and were not amendments.

By letter dated September 2, 1993, NRC requested additional information. NRC also stated that the changes to Chapter 11 indicated that changes should also be made to Chapter 2 of the license, and instructed the licensee to request an amendment to make those changes. By letter dated October 14, 1993, the licensee provided the additional information, and committed to submitting the amendment application. The licensee submitted the amendment application on December 10, 1993.

Discussion

By letter dated May 6, 1993, the licensee notified NRC of changes to Chapter 11 of the Safety Demonstration. Specifically, the changes involved personnel holding the positions of Manager, Materials and Scheduling; Manager, Master Scheduling and Uranium Management; and Supervisor, Traffic and Warehousing. In addition, the licensee provided education and experience statements for the new staff holding these positions. Since these positions are not within the safety organization, Chapter 2, Section 2.2, does not include personnel education and experience requirements for them. The new statements have been inserted into Chapter 11 to replace the statements for the former staff.

The licensee also submitted an entirely new Chapter 11, which added the positions of Manager, Master Scheduling and Uranium Management, and Staff Engineer, Licensing, and deleted the education and experience statements for the Health Physics (HP) Technicians. The statements for the HP Technicians were deleted from Chapter 11 because of frequent staff promotions and turnover. The licensee maintains the commitment to minimum qualifications for HP Technicians set forth in Section 2.2.6 of the license.

A revised Table of Contents for Chapter 11 was also submitted.

Section 11.6 of the Safety Demonstration was also revised. The title of this Section was changed from Changes in Procedures, Facilities, and Equipment to Changes in Facilities and Equipment. The Section describes the Engineering Change Notice (ECN) procedure, which is used for any changes in facilities and equipment involving licensed materials. The previous version of Section 11.6 specified the scope of ECNs and the process of ECN review, control/documentation, review/concurrence/approval, execution, acceptance, startup council, acceptance test, records, and procedure changes. The revised version contains similar subsections, but is less specific.

In a letter dated June 15, 1993, the licensee resubmitted the changed Sections of Chapter 11 with corrected page numbers.

NRC staff reviewed the changes to Chapter 11, and determined that Chapters 1 and 2 of the License Conditions should be amended to correspond to the Chapter 11 changes. In a letter dated September 2, 1993, NRC instructed the licensee to request an amendment to make specific changes to the License Conditions, including the following:

1. Organizational responsibilities and authority, and minimum qualifications for the Manager, Waste Management Engineering, and for the Manager, Analytical Laboratories, should be added to Sections 2.1 and 2.2, respectively;
2. Section 2.5 should be revised to explicitly include the ECN procedure, to identify the individuals responsible for the ECN procedure, and to include the safety-related conditions under which an ECN would be used; and
3. The approval and responsibility matrix, Figure 1-2.3, should indicate audit and acceptance responsibilities for ECNs.

In the same letter, NRC stated that Chapter 11 of the Safety Demonstration should include the following additional information:

4. Education and Experience Statements for the Manager, Waste Management Engineering, and the Manager, Analytical Laboratories;
5. Corrected title for S.F. Kuick, Manager, Master Scheduling and Uranium Management; and
6. A description of how the ECN procedure and the conditions under which it is used protect safety.

In a letter dated October 14, 1993, the licensee responded to NRC's request for additional information.

In the response to comment 1, the licensee committed to make the changes to Sections 2.1 and 2.2, and stated that these changes would be made in the near future.

In a letter dated December 10, 1993, the licensee requested an amendment to Chapter 2 to add the organizational responsibilities of the Manager, Waste Management Engineering, and the Manager, Analytical Laboratories, to Section 2.1. Minimum qualifications for these positions were not added to Section 2.2., because these positions are not within the safety organization at the facility. NRC agrees that minimum qualifications for these positions need not be included. The licensee also revised the responsibilities of the Manager, Quality Control, as a result of the addition of the Manager, Analytical Laboratories, because the Manager, Analytical Laboratories, reports to the Manager, Quality Control, and several responsibilities have been delegated.

In response to comments 2 and 3, the licensee confirmed that the ECN procedure is one of the "procedures, standards, and guides" that the licensee uses to conduct business, and, therefore, they have committed to controlling activities involving special nuclear material in accordance with this procedure. The licensee stated that the specifications have been included in the ECN procedure, and that the ECN procedure has been incorporated into the plant Safety Manual. At a meeting with Mr. Jim Edgar, SPC's Licensing Staff Engineer, at NRC on November 2, 1993, as documented in a letter from Ms. M. Adams, NRC, to Mr. L. Maas, SPC, dated November 8, 1993, Mr. Edgar clarified that the Engineering Change Notice is discussed in Chapter 3 of the SPC Safety Manual. The Safety Manual contains a summary of the conditions under which plant equipment and facilities are modified. The Safety Manual is a higher-tiered document than the ECN procedure is, and is subject to the same preparation, review and implementation process that is followed for other plant procedures, in accordance with the Approval and Responsibility Matrix, Figure I-2.3, in the license. NRC agrees that SPC's confirmation that this commitment applies to the ECN procedure is an acceptable response, and that the Matrix need not be revised.

In response to comments 4 and 5, SPC has provided education and experience statements for the Manager, Waste Management Engineering, and for the Manager, Analytical Laboratories, and corrected the title for Mr. S.F. Kuick. These statements have been inserted into Chapter 11 of the Safety Demonstration. In the December 10, 1993, amendment application, the licensee also provided new experience and education statements for the Managers of Plant Operations and of Materials and Scheduling. The licensee also substituted the experience and education statement of Mr. Ken Tanaka, Environmental Engineer, for that of Mr. J.M. Thomas, who has left the company.

In response to comment 6, SPC revised paragraph 11.6.1 to describe the safety-enhancement aspects of the ECN procedure. This revised Section has been inserted into Chapter 11 of the Safety Demonstration.

Categorical Exclusion

These changes to staff responsibilities and authority and facility procedures constitute an amendment that is administrative, organizational, and procedural in nature. Accordingly, pursuant to 10 CFR 51.22(c), neither an environmental assessment nor an environmental impact statement is warranted for the proposed action.

Conclusion

Based on the discussion, the staff concludes that approval of the amendment will not adversely affect the protection provided for the health and safety of SPC employees, the public or the environment. Therefore, approval of this application is recommended.

The Region V Principal Inspector has no objection to this proposed action.

Principal Contributor

Mary Adams