



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING

AMENDMENT NOS. 155 AND 157 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated July 11, 1989 as supplemented on April 20, 1990, Philadelphia Electric Company requested an amendment to Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. The licensee's April 20, 1990 letter proposed editorial and administrative revisions to the TS changes proposed in its original July 11, 1989 submittal. The staff has determined that these additional changes do not substantially alter the actions noticed or affect the proposed determination that the amendments involve no significant hazards consideration published August 23, 1989. The amendments would remove organization charts from the Technical Specifications (TS) in accordance with the guidance provided in NRC Generic Letter 88-06. The proposed amendments also involve miscellaneous administrative changes.

2.0 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 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. As a consequence, organizational changes have necessitated the need to request an amendment of the operating license.

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 organizational charts from its TS under the lead-plant concept that included the endorsement of the proposed changes 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 need to be retained. 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 TS. Generic Letter 88-06 provided this guidance to all power reactors.

3.0 EVALUATION

The licensee's proposed changes to its TS are in accordance with the guidance provided by Generic Letter 88-06 and addressed 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 that 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 Peach Bottom Quality Assurance Plan.
- (3) The senior reactor operator license qualified positions of the unit staff were added to Specification 6.2.2. Therefore, this requirement that was identified on the organization chart for the unit staff will be retained. In addition, minimum shift crew composition requirements which were previously specified in Figure 6.2-2 were added as Table 6.2.1
- (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 QA Plan.

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 on 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.

With respect to the administrative changes referred to as Category B changes in the licensee's submittal, the replacement of the Technical Engineer with the Engineer-Systems as a member of the on-site review committee reflected a change in the Superintendent-Technical's organization, and is acceptable. The administrative change which proposed to delete the direct reporting function of the Nuclear Review Board to the Office of the Chief Executive will retain the reporting function of the off-site review committee to the senior corporate executive with overall responsibility for nuclear operations. In its submittal, the licensee states that this administrative change reflected the formation of the Nuclear Committee of the Board, whose function is to advise and assist the Board of Directors on the licensee's nuclear operations. Based on the licensee's discussion of the Nuclear Review Board's interactions with the Nuclear Committee of the Board, the staff concludes that this change is acceptable.

The staff notes that the proposed administrative change to allow audit reports to be forwarded to the corporate officers responsible for the audited areas, rather than the Executive Vice President-Nuclear, is not consistent with the standard TS. The staff will continue its review of this item as a separate action.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, or administrative procedures or requirements. Accordingly, the amendments meet 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 nor environmental assessment need be prepared in connection with the issuance of these amendments.

5.0 CONCLUSION

The Commission made a proposed determination that the amendments involve no significant hazards consideration which was published in the Federal Register (54 FR 35107) on August 23, 1989 and consulted with the Commonwealth of Pennsylvania. No public comments were received and the Commonwealth of Pennsylvania did not have any comments.

The staff has 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 the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: August 20, 1990