



Entergy Operations

Entergy Operations, Inc.

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October 9, 1990

@CAN109002

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Technical Specifications Change Request
Section 6.0 - Administrative Controls

Gentlemen:

Entergy Operations, Inc. proposes to revise the ANO-1 and 2 Technical Specifications to delete specific references to staff positions and Plant Safety Committee compositions in each unit's Section 6.0, "Administrative Controls". A similar change was granted by to Grand Gulf Nuclear Station Unit-1 (License NPF-29, Docket 50-416), dated September 28, 1989. Some existing titles are being changed as a result of realignment of certain management positions due to completion of the Entergy Operations, Inc. consolidation activities. Additionally, removal of the burden of the PSC for review of minor procedure changes which have no safety impact is being requested.

The proposed changes are enclosed for your review and approval. The proposed changes have been evaluated in accordance with 10CFR50.91(a)(3) using the criteria in 10CFR50.92(c) and it has been determined that the changes involve no significant hazards considerations.

The circumstances of the proposed amendment are neither exigent nor emergency; however, prompt NRC processing is requested. We also request that the amendment become effective 30 days after your approval and issuance, to allow time for procedure and other necessary administrative changes.

Very truly yours,

NSC:fc
Enclosures

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U.S. NRC
October 9, 1990
Page 2

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STATE OF ARKANSAS)
)
COUNTY OF LOGAN) SS

I, N. S. Carns, being duly sworn, subscribe to and say that I am Vice President, Operations AND for Entergy Operations, Inc.; that I have full authority to execute this oath; that I have read the document numbered 0CAN109002 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

N S Carn

N. S. Carns

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 9th day of October, 1990.

Sandy Lichenmorgen

Notary Public

My Commission Expires:

May 11, 2000

ENCLOSURE

PROPOSED TECHNICAL SPECIFICATIONS

AND

RESPECTIVE SAFETY EVALUATION

IN THE MATTER OF AMENDING

LICENSE NOS. DPR-51 AND NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNITS 1 AND 2

DOCKET NOS. 50-313 AND 50-368

PROPOSED CHANGE

The proposed change would replace specific references to staff positions currently in the Technical Specifications (TS) with a more general requirement for Plant Safety Committee (PSC) composition. Specifically, ANO-1 TS 6.5.1.2 and ANO-2 TS 6.5.1.2, "PSC Composition", would be changed to replace the titles of PSC members with the requirement that the PSC will be composed of eight members of the ANO onsite operating management organization at the superintendent level or above and a designated PSC Chairman. The replacement of the specific staff position references will provide greater flexibility to implement changes in the organizational structure which are administrative and do not affect the safe operation of the plant.

The composition descriptions for the PSC would also be revised in Subsection 6.5 so that specific position titles are not used to designate membership; rather, general requirements of positions and qualifications are used that capture the essential aspects of PSC composition without compromising member function or expertise.

ANO-1 TS Sections 6.5.1.6.a and 6.8.2 and ANO-2 TS Sections 6.5.1.7.a and 6.8.2 change the review responsibility of the PSC from all changes to procedures required by Specification 6.8 to those procedures with changes "in intent". This removes the burden on PSC to review non-safety significant changes.

ANO-1 and ANO-2 TS Sections 6.8.3 are being changed to clarify that this procedural approval process is not a temporary change but an interim approval process for permanent procedure changes. This change does not modify or diminish the scope of the PSC interim or permanent procedure review responsibilities.

Additionally, (1) the ANO site Vice President's title, and certain other position titles, are corrected throughout each units' Section 6.0 to reflect the present organization, (2) the unit-specific Plant Manager title is added to the Director, Operations position title in TS subsections related to the PSC to more accurately reflect the management reporting structure under the present ANO organizational alignment, (3) certain inconsistencies between the ANO-1 and ANO-2 TS are corrected where wording should be identical and (4) a clarification to ANO-2 TS section 6.5.1.3 (formerly under 6.5.1.2) to ensure that nuclear software expertise is present when reviewing Core Protection Calculator (CPC) software.

BACKGROUND

Generic Letter (GL) 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements," provided guidance to licensees for the removal of organization charts from the TS. Removal of the position titles and reporting requirements in the onsite and offsite organization charts from the TS provides greater flexibility for implementing changes in these organizations. GL 88-06 stated that organization charts in the TS may be replaced with general requirements that capture the essential aspects of the organizational structure and that the organization charts containing specific positions should be placed and maintained in the updated Safety Analysis Report (SAR). The NRC authorized removal of the onsite and offsite organization charts pursuant to GL 88-06 in Amendments 112 and 87, respectively for ANO-1 and ANO-2, dated August 18, 1988.

However, the PSC composition as presently specified in each ANO units' TS contains position titles. Therefore, this change further supports the intent of Generic Letter 88-06. Replacement of specific organizational position titles with general requirements for PSC composition will eliminate the needless expenditure of both NRC and Entergy Operations resources.

DISCUSSION

Under the proposed change, the TS regarding PSC composition continues to define the number and qualifications of the PSC members.

The replacement of specific position titles with general requirements for the PSC composition in the Technical Specifications is administrative. The proposed change does not alter Entergy Operations' commitment to maintain a management structure that contributes to the safe operation and maintenance of the plant. The same level of position qualifications are maintained and not reduced by the proposed change.

The level and quality of PSC review will be maintained and unaltered by the proposed change. The PSC is currently composed of eight members and a chairman from the ANO onsite operating organization at the Superintendent level or above and this is not to be altered by the proposed change.

The change to ANO-1 TS Sections 6.5.1.6.a and 6.8.2 and ANO-2 TS Sections 6.5.1.7.a and 6.8.2 to require PSC review of only "intent" changes to procedures under 6.8 allows non-safety significant changes from requiring review by the PSC. Changes in intent is the same as that currently considered in TS Section 6.8.3.a. Intent changes are those which meet one of the following criteria:

- Involves a change in the PURPOSE of the procedure
- Involves a change in the SCOPE of the procedure
- Degrades the controls prescribed in the Administrative Procedures
- Involves a change that reduces the level of nuclear safety
- Involves a change that degrades the acceptance criteria

The process for determining intent changes is clearly defined in the procedure revision procedures and requires management review and approval of intent change designation prior to procedure approval. This TS change will not lessen the responsibility of the PSC for reviewing procedure changes which could effect safety but only removes the burden of reviewing minor routine procedure changes that require PSC approval.

The addition of the specific unit plant manager along with the Director, Operations in certain sections provides for either individual to have authority for designated actions.

The remaining changes are either considered clarifications to information already contained in the TS or are purely editorial to provide for wording consistency between ANO-1 and ANO-2 Technical Specification's sections.

DETERMINATION OF SIGNIFICANT HAZARDS

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards consideration using the standards in 10CFR50.92(c). A discussion of these standards follows:

1. No significant increase in the probability or consequences of an accident previously evaluated results from this change.

The replacement of the PSC composition requirements and changes to titles of certain senior management personnel are administrative in nature. The proposed change does not affect assumptions contained in plant safety analyses, the physical design or operation of the plant, nor are TS that preserve safety analysis assumptions affected.

The same level of expertise applied to the PSC review function will exist with the approval of the proposed change. There will be no loss in PSC effectiveness due to the proposed change. Therefore, there is no increase in the probability or consequences of previously analyzed accidents due to the proposed change.

Only those procedures with "intent" changes could effect the safety of the plant. These procedure changes will still require PSC review and therefore the probability or consequences of previously analyzed accidents will be unchanged.

2. This change would not create the possibility of new or different kind of accident from any previously evaluated.

The proposed changes are administrative. No physical alternations of plant configuration or changes to setpoints or operating parameters are proposed. The level of position qualifications are not reduced in the TS. The same quality of PSC review is maintained and unaltered by this proposed change. Therefore, the possibility of a new or different kind of accident from any previously evaluated is not created.

3. This change would not involve a significant reduction in the margin of safety.

The proposed changes are administrative and does not relate to or modify the safety margins defined in and maintained by the Technical Specifications. The change does not alter ANO's commitment to maintain a management structure that contributes to the safe operation and maintenance of the plant. No position qualifications are being reduced in the Technical Specifications. The level and quality of PSC review is maintained since there will be no change in the collective talents on the PSC. The safety significant scope of independent review conducted by the PSC will be unchanged. Therefore, this proposed change will not involve a significant reduction in the margin of safety.

The NRC has provided guidance concerning examples of amendments which are not likely to involve significant hazards considerations. The proposed changes most closely resemble Example (i): A purely administrative change to TS; for example, a change to achieve consistency throughout the TS, correction of an error, or a change in nomenclature.

Based on the discussion and evaluation presented above, Entergy Operations has concluded that the proposed TS change does not involve a significant hazards consideration.