



GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 210 ST FRANCISVILLE, LOUISIANA 70775
AREA CODE 804 631-6094 345-8857

February 13, 1991
RBG- 34,489
File Nos. G9.5, G9.42

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

On August 28, 1990, Gulf States Utilities (GSU) Company filed an application to amend the River Bend Station - Unit 1 Technical Specifications, Appendix A to Facility Operating License NPF-47, pursuant to 10CFR50.90. That application was filed to change Technical Specifications 6.5.1 and 6.5.3 concerning the FRC and NRB composition. In discussions on December 10, 1990, the NRC identified concerns with that GSU submittal. The NRC questions were similar for both of the committees and were:

1. What are the qualification requirements for the alternates?
2. What limits are there on the number of alternates for these committees?
3. What limits are there on the number of alternates allowed for a quorum?
4. For the FRC membership, what is meant by senior staff?

This letter revises GSU's August 28, 1990 submittal to address each question. This reply will discuss the proposal resolution for the plant staff review (FRC) and independent review (NRB) separately.

Presently, Technical Specification 6.5.1.3 requires the FRC Chairman to appoint all alternate members in writing. This specification also limits the attendance to no more than two alternates as voting members in FRC activities at any one time. Also, Specification 6.5.1.5 requires the quorum of the FRC be limited to the Chairman or his designated alternate and a minimum of four members, including no more than two alternates. As a result of the NRC concerns, GSU proposes the requirements on qualification of members to be ANSI/ANS 3.1, Section 4.4 and to include the same level of qualification for the alternates. Also, to address the concerns of quorum requirements, GSU withdraws the requested change from our August 28 letter and agrees that the previous limitation of no more than two (2) alternates for the minimum quorum be maintained.

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To address the concern on the term 'senior staff', GSU proposes to change the requirements for the FRC membership to be the Plant Manager's first level of management, presently titled as Assistant Plant Managers (APM's) and the Director of Radiological Programs with the remaining membership to be chosen from the plant supervisory staff. These individuals shall be assigned in writing by the chairperson and will meet the applicable ANS and ANSI qualifications. To reduce future changes to the specification upon changes to the organization, GSU proposes the Chairperson be assigned in writing by the Plant Manager. The individual will be chosen from the first management level that directly reports to the Plant Manager. Alternate Chairperson(s) will be chosen from the membership of the FRC as determined by the Plant Manager. GSU believes this change is consistent with guidance provided in Generic Letter (GL) 88-06. This change will provide the lines of authority and responsibility for the membership and quorum requirements of the FRC as required in the GL.

The results of these proposed changes will allow the quorum of the FRC to consist of the Chairperson or his designated alternate and at least four qualified and approved staff members including no more than 2 alternates. This change will also eliminate the need for specific titles without compromising the level of expertise and competence required for the proper review of operational phase activities. The other Technical Specifications associated with the FRC such as meeting frequency, audit, review areas and records will remain unchanged.

The proposed change to Specification 6.5.3.2 is to allow the NRB to be comprised of at least nine (9), but no more than thirteen (13) individuals who possess the necessary expertise to provide the independent review and audit function of areas identified in Section 6.5.3.1. The NRB Chairperson will continue to approve the permanent NRB membership based on nominations from the Senior Vice-President, River Bend Nuclear Group. Technical Specification 6.5.3.6 requires the quorum of the NRB necessary for the performance of the NRB review and audit functions of these Technical Specifications to consist of the Chairman or the Vice-Chairman and at least six (6) NRB members, including no more than two (2) alternates. No more than a majority of the quorum shall have line responsibility for operation of the unit. As a result of these concerns, GSU proposes the requirements on qualification of members to be ANSI/ANS 3.1, Section 4.7 and to include the same level of qualification for the alternates. To address the concerns of quorum requirements, GSU withdraws the requested change in this area listed in our August 28 letter and agrees that the previous limitation of no more than two (2) alternates for the minimum quorum be maintained. The requirement that no more than a minority of the quorum shall have line responsibility for the operation of the unit will also be retained.

As above, this change will eliminate the need for specific titles without compromising the level of expertise and competence required for the proper review of operational phase activities. The other Technical Specifications associated with the NRB such as alternates, meeting frequency, audit/review areas and records will remain unchanged.

These proposed changes do not diminish GSU's ability to meet the present acceptance criteria. Administrative controls are currently in place to control membership, qualification and review requirements for both the onsite review activity (FRC) and the independent review program (NRB). Training requirements for the NRB and FRC membership will continue in accordance with the current training program.

For clarity, the enclosure to this letter provides the proposed revisions to the Technical Specifications in their entirety. The no significant hazards considerations have not changed and remain as stated in GSU's August 28, 1990 letter. GSU requests that this Technical Specification change be made effective upon implementation.

If you have any questions or require further information, please contact Mr. L. L. Dietrich of my staff at (504) 381-4866.

Sincerely,



W. H. Odell
Manager - Oversight
River Bend Nuclear Group

WHO/LAE/LLD/~~WHE~~/pj

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)
PARISH OF WEST FELICIANA)
In the Matter of)
GULF STATES UTILITIES COMPANY)
(River Bend Station - Unit 1)


Docket No. 50-458

AFFIDAVIT

W. H. Odell, being duly sworn, states that he is a Manager-Oversight for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.


W. H. Odell

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 13th day of February, 1991. My Commission expires with Life.


Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ENCLOSURE

The proposed revisions to Specifications 6.5.1 and 6.5.3 are included and the inserts noted below.

INSERTS:

Specification 6.5.1.2; COMPOSITION

The FRC shall be composed of:

A Chairperson assigned by the Plant Manager. The Chairperson will be chosen from the personnel reporting directly to the Plant Manager.

The remainder of the members shall be from the personnel reporting directly to the Plant Manager and the supervisory staff. This composition will be representative of the various disciplines.

All members shall be qualified to the applicable portions of ANS 3.1-1978, Section 4, prior to being approved by the Chairperson. This qualification will be maintained while assigned to FRC activities.

Specification 6.5.1.3; ALTERNATES

All alternate members shall be appointed in writing by the FRC Chairperson and be shall qualified to the applicable portions of ANS 3.1-1978, Section 4, prior to being approved by the Chairperson. This qualification shall be maintained while assigned to FRC activities.

Specification 6.5.3.2; COMPOSITION

The NRB shall be composed of at least nine but not more than thirteen individuals who shall possess the necessary expertise to provide the independent review and audit functions identified in Specification 6.5.3.1. All members shall be qualified to the applicable portions of ANS 3.1-1978, Section 4, prior to being approved by the Chairperson. This qualification will be maintained while assigned to NRB activities. The Senior Vice President-RBNG provides nominations for permanent NRB membership to the NRB Chairperson for review and approval.

Specification 6.5.3.3; ALTERNATES

All alternate members shall be appointed in writing by the NRB Chairperson and be qualified to the applicable portions of ANS 3.1-1978, Section 4, prior to being approved by the Chairperson. This qualification will be maintained while assigned to NRB activities.