



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 113 AND 114 TO

FACILITY OPERATING LICENSE NOS. DPR-51 AND NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT NOS. 1 AND 2

DOCKET NOS. 50-313 AND 50-368

INTRODUCTION

By letter dated October 9, 1990, as supplemented January 21, 1991, Entergy Operations, Inc. (the licensee) requested amendments to the Technical Specifications (TS) appended to Facility Operating License Nos. DPR-51 and NPF-6 for Arkansas Nuclear One, Unit Nos. 1 and 2 (ANO-1&2). The proposed amendments would revise ANO-1 and ANO-2 Technical Specifications to delete specific references to staff positions and Plant Safety Committee (PSC) compositions in each unit's Section 6.0, "Administrative Controls," in that specific titles of the PSC members are being deleted and replaced with a generic phrase. The proposed changes also reflect the realignment of certain management positions and delete the review of minor procedure changes that do not affect nuclear safety from the PSC responsibilities. In addition, the proposed amendments include editorial changes. The January 21, 1991, submittal contained clarifications only and did not alter the intent of the initial amendment request dated October 9, 1990.

EVALUATION

Generic Letter 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 licensees to implement changes in these organizations. Generic Letter 88-06 states that the 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 Final Safety Analysis Report (UFSAR). The NRC staff authorized removal of the onsite and offsite organization charts pursuant to Generic Letter 88-06 in Amendments 112 and 87, respectively, for ANO-1 and ANO-2 to the Facility Operating Licenses issued August 18, 1988. However, the composition of the Plant Safety Committee (PSC) as presently specified in TS 6.5.1.2 contains organization position titles. Therefore, the flexibility intended to be achieved by removal of the organization charts from the TS is considerably decreased if the compositions of the PSC remain in the TS.

The licensee has proposed to change ANO-1 TS 6.5.1.2 and ANO-2 TS 6.5.1.2, "PSC Composition," by replacing 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 PSC members and areas of responsibility will be designated in the Administrative Procedures. Changes to these procedures are made in accordance with 10 CFR 50.59. In addition, the makeup of the PSC will be from the superintendent level or above which will allow decisions to be made and approved at an appropriate level. The NRC staff concludes that the proposed TS 6.5.1.2 for both units is acceptable because it defines the number and qualifications of the PSC members.

The licensee has proposed to change 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 delete the review of minor procedure changes that do not affect nuclear safety from the PSC responsibilities. The proposed amendments will allow the PSC to review in greater detail safety significant items by requiring PSC review of only "intent" changes to procedures under TS Section 6.8. 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 licensee's procedure revision procedures and requires management review and approval of intent change designation prior to procedure approval. For these reasons, the staff concludes that these changes are acceptable.

The licensee has also proposed to change ANO-1 and ANO-2 TS Section 6.8.3 to clarify that the 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. These are editorial and administrative changes, and therefore, are acceptable.

On the basis of its review, the staff concludes that the licensee has provided an acceptable evaluation of these items. Accordingly, the staff finds the proposed changes to be acceptable.

ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, reporting, 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(t), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

CONCLUSION

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.

Date: February 4, 1991

Principal Contributor: S. Peterson