

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

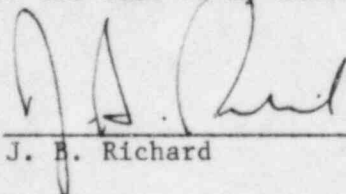
LICENSE NO. NPF-13

DOCKET NO. 50-416

IN THE MATTER OF
MISSISSIPPI POWER & LIGHT COMPANY
and
MIDDLE SOUTH ENERGY, INC.
and
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

AFFIRMATION

I, J. B. Richard, being duly sworn, stated that I am Senior Vice President - Nuclear of Mississippi Power & Light Company; that on behalf of Mississippi Power & Light Company, Middle South Energy, Inc., and South Mississippi Electric Power Association I am authorized by Mississippi Power & Light Company to sign and file with the Nuclear Regulatory Commission, this application for amendment of the Operating License of the Grand Gulf Nuclear Station; that I signed this application as Senior Vice President - Nuclear of Mississippi Power & Light Company; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.



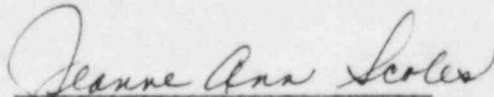
J. B. Richard

STATE OF MISSISSIPPI
COUNTY OF HINDS

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 24th day of May, 1984.

(SEAL)

8405300609 840524
PDR ADOCK 05000416
P PDR



Notary Public

My commission expires:

My Commission Expires - Sept. 21, 1987

SUBJECT: Various subsections of the Administrative Controls (Section 6.0) of the Technical Specifications as listed below:

6.1.1, 6.2.2.f, 6.2.3.4, 6.5.1.1, 6.5.1.2, 6.5.1.3, 6.5.1.7, 6.5.2.2, 6.5.3.1 and Figures 6.2.1-1 and 6.2.2-1.

Affected pages include 6-1 through 6-4, 6-6 through 6-9, 6-12 and 6-13.

DESCRIPTION
OF CHANGE:

Revisions to the various Administrative Controls technical specifications are proposed to reflect the changes in the proposed Offsite Organization chart (Figure 6.2.1-1). Additional changes are proposed to the Unit Organization chart (Figure 6.2.2-1).

The changes requested in PCOL-83/27 which were transmitted by MP&L letter, dated January 18, 1984, (AECM-84/0009) are hereby withdrawn. The proposed changes in this request supersede those of the earlier request. Further, the NRC evaluation of PCOL-83/27 provided in the May 8, 1984 letter to MP&L has been considered in the preparation of this proposed change. Specifically,

1. The title changes which were found acceptable in above referenced NRC letter to MP&L are included in the attached proposed revision.
2. The deletion of positions below superintendent level from Figure 6.2.2-1 originally proposed in PCOL-83/27 has been reconsidered. The positions reporting to the Operations Superintendent, the Maintenance Superintendent (now the Manager, Plant Maintenance), the Technical Support Superintendent, and the Chemistry/Radiation Control Superintendent are now included in the attached proposed revision to the subject figure. The figure has also been revised to reflect unit organizational changes.

The specific changes due to the new Offsite Organization are:

1. The title Plant Manager has been changed to GGNS General Manager.
2. The Item 6.2.2.f, "Plant Superintendent or his deputy" has been revised to "GGNS General Manager or his designee" in order to properly assign this responsibility within the new organization.
3. Item 6.2.3.4 is corrected to indicate that the ISEG provides recommendations directly to the Senior Vice President, Nuclear.

4. The titles of the representatives to the PSRC and the SRC have been changed to be consistent with the new titles of these individuals.
5. Figure 6.2.1-1 has been revised to reflect the new organization.

The specific changes due to the new Unit Organization are:

1. The title Chemistry and Radiation Protection Superintendent has been changed to Chemistry/Radiation Control Superintendent.
2. The PSRC membership position of the Maintenance Superintendent has been changed to the I&C Superintendent.
3. Figure 6.2.2-1 has been revised to reflect the new unit organization.

An additional member to the PSRC is also proposed with this change: that is the Technical Engineering Supervisor.

JUSTIFICATION:* The proposed changes in the offsite organization are made to strengthen the Nuclear Production Department represented in the chart. The rationale for certain key changes is presented here. MP&L engineering resources have been placed under a single department manager, i.e., the Director, Nuclear Engineering and Construction. The Nuclear Licensing & Safety functions, originally in the Nuclear Services organization, have been separated and are now under the management of the Director, Nuclear Licensing & Safety. This change directs increased management resources to the NRC interface role. Principal responsibility for safe and reliable plant operation is assigned to the Vice President, Nuclear Operations. The Nuclear Operations Department consists only of the Plant Staff and the above mentioned Nuclear Licensing and Safety Section. The support functions of the Nuclear Production Department are now aligned under a single company officer, the newly formed position of Vice President, Nuclear Support. One additional position was formed, namely, the Manager, Nuclear Human Resources. This manager reports to the Nuclear Production Department's senior management and will provide required management attention to certain key personnel related areas such as recruiting, morale, and retention.

*Additional justification is not provided for those changes originally proposed in PCOL-83/27 and found acceptable in the NRC letter to MP&L, dated May 8, 1984.

The proposed changes in the Unit Organization are made to strengthen the site organization. This has been accomplished by consolidating the technical personnel under the Manager, Plant Operations and separating the maintenance group under its own Manager and deleting the position of Maintenance Superintendent. The positions in the operations group are detailed to support the NRC evaluation of both the PSRC membership and the overall unit organization (in response to the staff evaluation of PCOL-83/27). The total number of positions requiring a license has not been reduced by this change. The new PSRC member proposed is intended to broaden the technical review capabilities and thus enhance the effectiveness of the PSRC.

SIGNIFICANT HAZARDS CONSIDERATION:

The proposed organizational changes are administrative in nature and are intended to focus more efficient and responsive management attention on licensing, operation, and maintenance of Grand Gulf Nuclear Station. This change is purely administrative in nature and does not involve the reduction of safety margins and does not represent an increase in the probability or consequences of an accident previously evaluated nor is the possibility of a new or different kind of accident from any accident previously evaluated created. Thus the proposed change to the Technical Specifications does not involve a significant hazards consideration.