



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 131 TO FACILITY OPERATING LICENSE NO. DPR-53
AND AMENDMENT NO. 112 TO FACILITY OPERATING LICENSE NO. DPR-69
BALTIMORE GAS AND ELECTRIC COMPANY
CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2
DOCKET NOS. 50-317 AND 50-318

INTRODUCTION

By letter dated June 13, 1988, the Baltimore Gas and Electric Company (BG&E, the licensee) proposed changes to the Units 1 and 2 Technical Specifications (TS) requirement 6.2, "Organization." The proposed changes would remove TS Figure 6.2-1, "Management Organization Chart - Calvert Cliffs Nuclear Power Plant - Baltimore Gas & Electric Company," and TS Figure 6.2-2, "Organization Chart (Two Unit Operation) - Calvert Cliffs Nuclear Power Plant - Baltimore Gas & Electric Company," and replace them with a narrative description of the offsite and onsite functional requirements in TS 6.2.1 and unit staff qualifications in TS 6.2.2. Guidance for these proposed changes to the TS was provided to all licensees and applicants by NRC Generic Letter (GL) 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements," dated March 22, 1988.

In addition, the licensee proposed administrative changes to the Units 1 and 2 TS 6.1, "Responsibility," 6.5.1, "Plant Operations and Safety Review Committee (POSRC)," 6.8, "Procedures," 6.16, "Process Control Program," and 6.17, "Offsite Dose Calculation Manual (DDCM)," to reflect the changes in nomenclature of a) the title "Manager-Nuclear Operations" to the new title of "Manager-Calvert Cliffs Nuclear Power Plant" and, b) the title of "General Supervisor-Operations" to the new title of "General Supervisor-Nuclear Operations".

BACKGROUND

Similar to the guidance provided in the Standard Technical Specifications, TS 6.2 of the administrative control requirements has referenced management offsite and onsite organization charts that are provided as figures to this section. On a plant specific basis, similar organization charts have been provided by applicants and included in the TS issued with the operating license. Subsequent restructuring of either of these 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 organization 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 would not be retained with the removal of the organization charts. 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.

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) Units 1 and 2 TS 6.2 were revised to delete the references to Figures 6.2-1 and 6.2.-2 which were removed from the TS.
- (2) Functional requirements of the offsite and onsite organizations shall be defined and added to TS 6.2.1 which are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in Chapter 12 of the Updated Final Safety Analysis Report (UFSAR). The documentation of the lines of authority, responsibility and communication through functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions is an additional requirement that is more restrictive than the current requirements of TS 6.2. In order to permit the licensee's new management sufficient time, following the September 1, 1988 reorganization, to evaluate plant problems, goals and programs and to appropriately determine and delegate these functional responsibilities and duties related to key positions, the licensee has proposed that this additional requirement not become effective until November 30, 1988, 90 days following the September 1, 1988 plant reorganization.

- (3) The senior reactor operator and reactor operator license qualified positions of the unit staff were added to TS 6.2.2., "Unit Staff." Therefore, this requirement that was previously identified on TS Figure 6.2-2 will be retained.
- (4) Consistent with requirements to document the offsite and onsite organizational relationships in the form of organization charts, the licensee has confirmed that this documentation currently exists in a Safety Evaluation performed under 10 CFR 50.59, "Changes, tests and experiments," and shall be included in the next required update of the UFSAR as specified in 10 CFR 50.71(e)(4). The additional restrictive requirement as described in (2) above shall be included in a 10 CFR 50.59 Safety Evaluation performed prior to November 30, 1988 (90 days following the September 1, 1988 reorganization). This information also shall be included in the next required update of the UFSAR.
- (5) The licensee has confirmed that no specifications, other than those noted in item (1) above, include references to the figures of the organization charts that are being removed from TS for their plant. Hence, this is not an applicable consideration, with regard to the need to redefine referenced requirements as a result of the removal of these figures.
- (6) Changing the names of the positions of Manager-Nuclear Operations and General Supervisor-Operations, which are referenced in TS 6.1, 6.5.1, 6.8, 6.16, and 6.17 is a purely administrative change with no resultant effect on the managing of the plant or upon its operations.

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 NPC guidance on removing organization charts from the administrative control requirements of 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 GL 88-06. In addition, the staff concludes that the changes in the names of the positions of Manager-Nuclear Operations and General Supervisor-Operations are purely administrative and have no effect upon plant management or operations. Accordingly, the staff finds that these proposed changes are acceptable.

ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that these amendments involve no significant-hazards consideration and there has been no public comment on such finding. 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 or environmental assessment need be prepared in connection with the issuance of these amendments.

CONCLUSION

The Commission made proposed determinations that the amendments involve no significant-hazards consideration, which were published in the Federal Register (53 FR 28283) on July 27, 1988. The Commission consulted with the State of Maryland. No public comments were received, and the State of Maryland did not have any comments.

On the basis of the considerations discussed above, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

PRINCIPAL CONTRIBUTORS:

T. G. Dunning
S. A. McNeil

Dated: August 31, 1988

- d. specifying in TS 6.2.2, "Unit Staff," the staffing positions required to hold operator licenses as was previously reflected in TS Figure 6.2.2;
 - e. adding a new TS 6.2.1.a requirement to establish and document the lines of authority, responsibility and communication in Chapter 12 of the UFSAR through functional descriptions of departmental responsibilities and relationships, and job descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions. Change 1.e would become effective 90 days following the effective date for changes 1.a through d.
2. Make changes to the Units 1 and 2 TS 6.1, "Responsibility," 6.5.1, "Plant Operations and Safety Review Committee (POSRC)," 6.8, "Procedures," 6.16, "Process Control Program," and 6.17, "Offsite Dose Calculation Manual (ODCM)," to reflect the changes in nomenclature of a) the title Manager - Nuclear Operations to the new title of Manager - Calvert Cliffs Nuclear Power Plant and, b) the title of General Supervisor - Operations to the new title of General Supervisor - Nuclear Operations.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular bi-weekly Federal Register notice.

Sincerely,

Original signed by

Scott Alexander McNeil, Project Manager
Project Directorate I-1
Division of Reactor Projects, I/II

Enclosures:

1. Amendment No.131 to DPR-53
2. Amendment No.112 to DPR-69
3. Safety Evaluation

cc: w/enclosures

See next page

PDI-1 *CV*
CVogant
8/31/88

PDI-1 *Sam*
SMcNeil:dlg
8/26/88

OGC
CPW
8/24/88

RC
PDI-1
RCapra
8/31/88