

9/13/83

Note to: R. Clark

From: J. Gray

SUBJECT: PROPOSED NOTICE FOR BROWNS FERRY AMENDMENT ON SENIOR REACTOR OPERATORS (SROs)

OELD has been asked to concur in a proposed notice of amendment to the Browns Ferry licenses involving the Administrative Controls section of the TS and SROs. I believe that the proposed notice should be clarified with regard to the description of the change involving SRO supervision of fuel handling operations. In addition, I believe the basis for the NSHC determination needs some modification to more clearly indicate a sound basis for our proposal to find NSHC. In particular, I question the characterization of the SRO/fuel handling operation change as being simply administrative.

Accordingly, I suggest the following changes to the proposed notice to better describe the amendment and to provide a clearer basis for the proposed NSHC determination:

- (1) Replace the last 2 sentences in the "Description of amendment request" with the following:

The amendment would also change the current license provision that requires fuel handling operations to be supervised by fully licensed SROs to a provision authorizing fuel handling operations to be supervised by personnel trained and licensed as SROs limited to fuel handling.

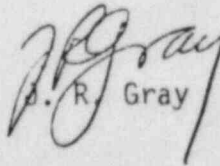
- (2) Replace the proposed "Basis for proposed no significant hazards consideration determination" with the following:

The Commission has provided guidance concerning the application of the standards by providing examples of actions that are likely, and are not likely, to involve significant hazards considerations (48 FR 14870). One example of an action not likely to involve significant hazards considerations (example (i)) is a purely administrative change such as a change to achieve consistency throughout the technical specifications, correction of an error or a change in nomenclature. The proposed change to the Administrative Controls technical specifications that would add the word "reactor" before the word "operator" to be consistent with the abbreviations SRO and RO is purely administrative in nature and falls within the cited example of a change not likely to

involve significant hazards considerations. On this basis, the staff proposes to determine that this change does not involve significant hazards considerations.

The license amendment that would permit supervision of fuel handling operations by SROs licensed only for fuel handling operations would not decrease the level of pertinent qualifications for fuel handling supervisors relative to requirements under the existing license. Since the fuel handling supervisors's expertise and qualifications in fuel handling operations will be the same under the proposed amendment as under the requirements of the existing license, this change will not significantly increase the probability or consequences of accidents previously considered. Also, since the proposed change involves only the designation and qualifications of personnel authorized to supervise fuel handling operations, it does not create the possibility of a new or different accident from any evaluated previously and will not significantly decrease any safety margins. For these reasons, the staff proposes to determine that the change involving supervision of fuel handling operations does not involve significant hazards considerations.

With changes to the proposed notice consistent with the foregoing, I would be prepared to concur.


D. R. Gray