



**North
Atlantic**

Energy Service Corporation

SEABROOK STATION UNIT 1

Facility Operating License NPF-86
Docket No. 50-443

License Amendment Request No. 92-04
Proposed Revision to the Requirement for the Operations Manager
to Maintain a Senior Reactor Operator License

This License Amendment Request is submitted by North Atlantic Energy Service Corporation pursuant to 10C R50.90. The following information is enclosed in support of this License Amendment Request:

- Section I - Introduction and Description of Proposed Changes
- Section II - Markup of Proposed Changes
- Section III - Retype of Proposed Changes
- Section IV - Safety Evaluation of Proposed Changes
- Section V - Determination of Significant Hazards for Proposed Changes
- Section VI - Proposed Schedule for License Amendment Issuance and Effectiveness
- Section VII - Environmental Impact Assessment

Sworn and Subscribed
to before me this
3rd day of November, 1992

Mary C. DeCedeno
Notary Public

Bruce L. Drawbridge
Bruce L. Drawbridge
Executive Director - Nuclear Production

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1. Introduction and Description of Proposed Changes

A. Introduction

The purpose of the proposed Technical Specification change is to revise Technical Specification 6.2.2f, "Station Staff", to require that the Operations Manager hold or have held a senior reactor operator license prior to assuming the position as Operations Manager.

Technical Specification 6.2.2f currently requires both the Operations Manager and the Assistant Operations Manager to hold a senior reactor operator license. This requirement is consistent with Section 13.1.2.2.b of the Seabrook Station Updated Final Safety Analysis Report (UFSAR). The UFSAR also states that all Station personnel either meet or exceed the minimum qualifications recommended in ANSI/ANS 3.1-1978 (Selection and Training of Nuclear Power Plant Personnel).

The guidance that the Operations Manager hold a senior reactor operator license was revised in ANSI/ANS 3.1-1987. The 1987 revision of ANSI/ANS 3.1 states that the Operations Manager shall meet one of four special requirements:

- Hold a senior reactor operator license
- Have held a license for a similar unit
- Have been certified at an appropriate simulator for equivalent senior operator knowledge
- Have been certified on plant operational knowledge based on the plant manager job analysis

The 1987 revision also states that if the Operations Manager does not hold an NRC license, then the "Operations Middle Manager" shall hold a senior reactor operator license.

Maintaining a senior reactor operator license requires the expenditure of a significant amount of time in requalification training. This training typically consumes a minimum of six weeks for senior reactor operator licensees on an annual basis. As stated in the UFSAR, the Operations Manager is responsible for managing the operation of the Station in compliance with Technical Specifications and other license requirements. To facilitate this responsibility the Operations Department is structured to provide several layers of direct technical supervision. Each level of shift supervision, from the Supervisory Control Room Operator on shift to the Shift Superintendent, is supervised by a licensed individual. The most senior individuals on shift, the Shift Superintendents, are supervised by the Assistant Operations Manager, who holds, and will continue to be required to hold, a senior reactor operator license.

The proposed change is consistent with the current industry guidance as delineated in ANSI/ANS 3.1-1987 and with similar amendments approved by the NRC for Duke Power's Oconee and McGuire plants. In addition, as described above, the proposed change will enhance the safe operation of the plant by increasing the amount of time the Operations Manager can devote to fulfilling his primary responsibilities.

B. Description of Proposed Changes

The proposed change would revise Technical Specification 6.2.2 as follows:

1. Section 6.2.2f would be revised to delete the requirement that the Operations Manager hold a senior reactor operator license and instead require the Operations Manager to hold or have held a senior reactor operator license for Seabrook Station prior to assuming the Operations Manager position.
2. A new paragraph 6.2.2g would be added to retain the current requirement that the Assistant Operations Manager hold a senior reactor operator license.

II. Markup of Proposed Changes

See attached markup of proposed changes to Technical Specifications.