6.2.2 STATION STAFF

a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;

c. A Health Physics Technician* shall be on site when fuel is in the reactor;

d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation; and

e. Administrative procedures shall be developed and implemented to limit the working hours of station staff who perform safety-related functions, e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel. The amount of overtime worked by station staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

f. The ~~Operations Manager and~~ Assistant Operations Manager shall hold a senior reactor operator license.

F. THE OPERATIONS MANAGER SHALL HOLD OR HAVE HELD A SENIOR REACTOR OPERATOR LICENSE FOR SEABROOK STATION PRIOR TO ASSUMING THE OPERATIONS MANAGER POSITION.

*The Health Physics Technician may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

III. Retype of Proposed Changes

See the attached retype of the proposed changes to Technical Specifications. The attached retype reflects the currently issued version of Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

Revision bars are provided in the right hand margin to designate a change in the text.

6.2.2 STATION STAFF

a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;

c. A Health Physics Technician* shall be on site when fuel is in the reactor;

d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation; and

e. Administrative procedures shall be developed and implemented to limit the working hours of station staff who perform safety-related functions, e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel. The amount of overtime worked by station staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

f. The Operations Manager shall hold or have held a senior reactor operator license for Seabrook Station prior to assuming the Operations Manager position.

g. The Assistant Operations Manager shall hold a senior reactor operator license.

*The Health Physics Technician may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

IV. **Safety Evaluation of License Amendment Request 92-04 Proposed Changes**

The proposed Technical Specification change does not adversely affect the safe operation of Seabrook Station. The current requirement in Technical Specification 6.2.2f for the Operations Manager to hold a senior reactor operator license requires a significant amount of the Operations Manager's time to be spent in requalification. During requalification training, the Operations Manager can not devote one hundred percent of his efforts to his primary responsibilities of managing the effective performance of the Operations Department.

As stated in section 13.1.2.1 of the Updated Final Safety Analysis Report, (UFSAR) the current requirement for the Operations Manager to hold a senior reactor operator license is based on the minimum qualifications recommended in ANSI/ANS 3.1-1978. However, this guidance was revised in the 1987 revision of ANSI/ANS 3.1. The current guidance recommends several options, one of which is for the Operations Manager to have held a license for a similar unit. In the case where the Operations Manager does not hold an NRC license, ANS/ANSI 3.1-1987 recommends that the "Operations Middle Manager" hold a NRC senior reactor operator license. The proposed Technical Specification change does not revise the existing requirement for the Assistant Operations Manager to hold a senior reactor operator license, and is consistent with the guidance of ANSI/ANS 3.1-1987.

The Operations Manager is responsible for managing the operation of the Station. This includes ensuring the effective performance of Operations Department personnel and the effective utilization of Operations Department resources. To facilitate implementation of this responsibility the Operations Department is structured to provide several layers of direct technical supervision. Each level of supervision, from the Supervisory Control Room Operator on shift, to the Shift Superintendent, is directly supervised by an NRC licensed individual. The most senior personnel on each shift, the Shift Superintendents, are directly supervised by the Assistant Operations Manager, who will continue to hold a senior reactor operator license.

The Operations Manager, by having been licensed as a senior reactor operator at Seabrook Station, will have gained the necessary skills, level of knowledge, and experience to fully understand the operation of Station equipment, the requirements for proper watchstanding, and for ensuring that the Station is operated in compliance with Technical Specifications and other license requirements. The Operations Manager does not stand Control Room watches nor manipulate controls such that a senior reactor operator license is required.

Deleting the requirement for the Operations Manager to hold a senior reactor operator license does not alter the design or operation of any plant system, component, or structure. It does not change the way any plant system is operated, does not reduce the knowledge, qualifications or skills of any watchstander, and does not affect the way the Operations Department is managed other than to allow the Operations Manager to focus his efforts on the effective performance of his personnel. It does not introduce any new failure mode. This proposed change does not affect any previously analyzed accident or malfunction, does not create the possibility of a different accident or malfunction not previously analyzed, and does not reduce the margin of safety as defined in the basis of any Technical Specification.

The proposed Technical Specification change would enhance plant safety by allowing the Operations Manager to dedicate more time to the management of the Operations Department and to ensuring that the plant is operated safely and in accordance with the Operating License requirements.

V. **Determination of Significant Hazards for License Amendment Request 92-04 Proposed Changes**

(1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change affects only an administrative control, which was based on the existing industry guidance in ANSI/ANS 3.1-1978, that recommended the Operations Manager hold a senior reactor operator license. The current guidance in ANSI/ANS 3.1-1987 recommends, as one option, that the Operations Manager have held a license on a similar unit with the Operations Middle Manager holding a senior reactor operator license. The proposed change in this License Amendment Request is consistent with the current guidance.

The proposed change does not alter the design of any system, structure, or component. It does not change the way any plant systems are operated. It does not reduce the knowledge, qualifications, or skills of any watchstander, and does not affect the way the Operations Department is managed other than to allow the Operations Manager to focus his efforts on maintaining the effective performance of his personnel and to ensuring the plant is operated safely and in accordance with the requirements of the Operating License.

The proposed change does not detract from the Operations Manager's ability to perform his primary responsibilities. By having previously held a senior reactor operator license he will have gained the necessary training, skills, and experience to fully understand the operation of plant equipment and the requirements for proper watchstanding.

The proposed change does not weaken the supervisory chain that presently exists in the Operations Department. All Control Room operators will continue to be supervised by NRC licensed personnel.

The proposed change is intended to improve the ability of the Operations Manager to provide the plant oversight required of his position. It does not have any affect on the probability or consequences of any previously evaluated accident.

(2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change to Technical Specification 6.2.2 does not affect the design or function of any plant system, structure, or component. It does not affect in any way the performance of NRC licensed operators, nor does it change the way any plant equipment is operated. Operation of the plant in conformance with Technical Specification and other license requirements will continue to be supervised by personnel who hold an NRC senior reactor operator license. The proposed change does not introduce any new failure modes.

The proposed change is intended to remove an administrative requirement which adds a significant burden to the Operations Manager without significantly contributing to his effectiveness in managing plant operation and ensuring that the plant is operated safely and in accordance with the requirements of the Operating License.

(3) The proposed change does not result in a significant reduction in the margin of safety.

The proposed change involves only an administrative control which is not related to the margin of safety as defined in the Technical Specifications. The proposed change does not reduce the level of knowledge or experience required of an individual who fills the Operations Manager position, nor does it affect the conservative manner in which the plant is operated. All Control Room operators will continue to be supervised by personnel who hold a senior reactor operator license. This includes the Assistant Operations Manager, who will continue to be required to hold a senior reactor operator license.

VI. Proposed Schedule for License Amendment Issuance and Effectiveness

North Atlantic requests NRC review of License Amendment Request 92-04 and issuance of a license amendment having immediate effectiveness by April 30, 1993.

VII. Environmental Impact Statement

North Atlantic Energy Service Corporation (North Atlantic) has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.