

ATTACHMENT I
TO
JPN-88-003

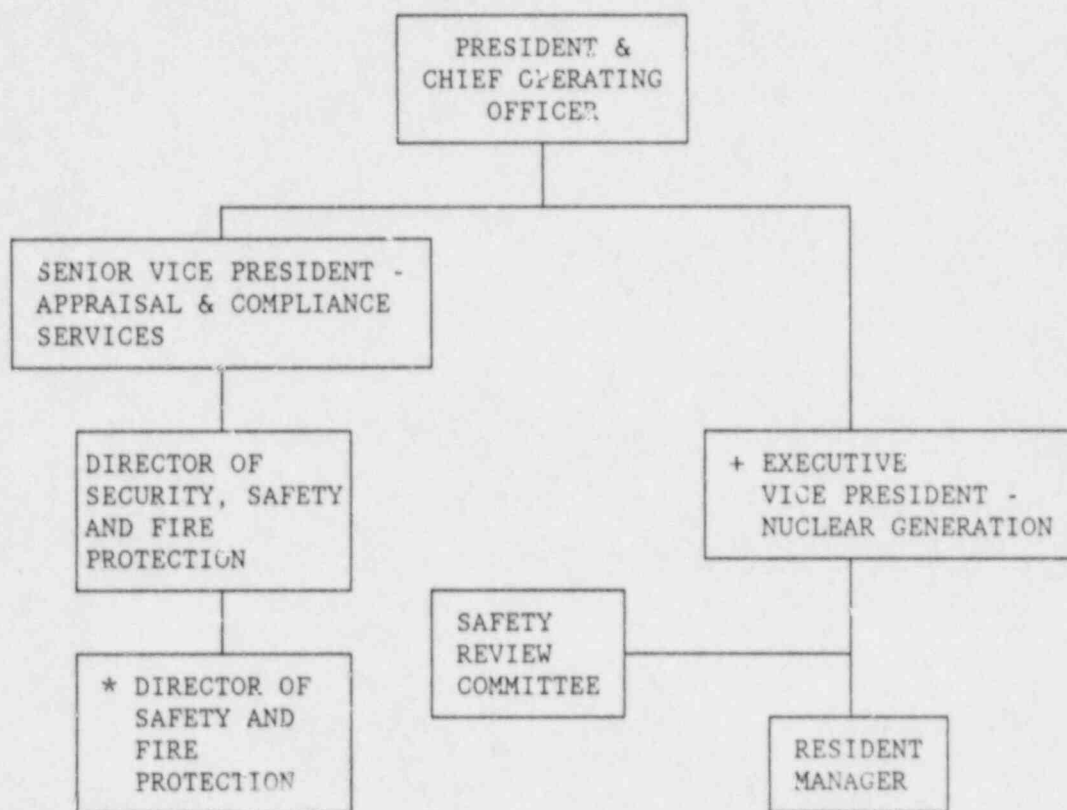
PROPOSED TECHNICAL SPECIFICATION CHANGES
RELATED TO
MANAGEMENT REORGANIZATION OF THE
NEW YORK POWER AUTHORITY
(JPTS-88-004)

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
DPR-59

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FIGURE 6.1-1

MANAGEMENT ORGANIZATION CHART
POWER AUTHORITY OF THE STATE OF NEW YORK
JAMES A. FITZPATRICK NUCLEAR POWER PLANT



+ The Executive Vice President - Nuclear Generation is responsible for administering the Fire Protection Program.

* The Director of Safety and Fire Protection Division, which is part of the Department of Appraisal and Compliance Services is the offsite management position responsible for assessing the effectiveness of the Fire Protection programs by conducting reviews and audits.

- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Nuclear Licensing
- m. Emergency Planning
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant

MEMBERSHIP

6.5.2.2 The SRC shall be composed of the following voting members:

Chairman:	Manager-Nuclear Safety Evaluation
Vice-Chairman:	Director-Quality Assurance
Member:	Vice President Nuclear Engineering
Member:	Vice President Nuclear Operations
Member:	Vice President-Nuclear Support
Member:	Resident Manager-IP3
Member:	Resident Manager-JAF
Member:	Consultant

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the SRC chairman. An Alternate Vice-Chairman shall be appointed in writing by the Executive Vice President - Nuclear Generation if necessary. However, no more than two alternates shall participate as voting members in SRC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of facility operation following initial fuel loading and at least once per six months, thereafter.

ATTACHMENT II
TO
JPN-88-003

SAFETY EVALUATION OF
PROPOSED TECHNICAL SPECIFICATIONS
RELATED TO
MANAGEMENT REORGANIZATION OF THE
NEW YORK POWER AUTHORITY
(JPTS-88-004)

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
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Section I DESCRIPTION OF PROPOSED CHANGES

The proposed changes to the James A. FitzPatrick Technical Specifications are the result of a recent Power Authority reorganization. The engineering staff and construction management functions will be merged into existing operations departments.

Specifically, the following changes are proposed for Figure 6.1-1 on page 259 of Appendix A entitled , "Management Organization Chart".

- [a] The Engineering and Design Department has been eliminated. Accordingly, the position of Executive Vice President & Chief Engineer-Engineering and Design has been eliminated.
- [b] The position of First Executive Vice President-Operations has been eliminated.

On page 251, subsection 6.5.2.2 SRC "Membership":

- [c] As a result of the elimination of the Engineering and Design Department, the position of Vice President - Design and Analysis has been eliminated. Consequently, the Vice President - Design and Analysis will no longer be a member of the Safety Review Committee (SRC).

Section II PURPOSE OF THE PROPOSED CHANGES

The purpose of this amendment to the FitzPatrick Technical Specifications is to reflect the recent reorganization of the New York Power Authority.

The Engineering and Design Department was divided into nuclear and non-nuclear analytical engineering and design groups. The support staff were reassigned to the Nuclear Generation and System Operations Departments. This change allows the grouping of similar and interdependent activities, affording each of the departments more effective control of the key resources required to accomplish its tasks. The Nuclear Generation Department will now be responsible for all operations, engineering, and construction of the Authority's nuclear power plants.

The proposed changes promote more efficient management by streamlining management hierarchy, thus resulting in more rapid problem resolution, easily identified responsibility, more direct communication links, and greater flexibility in adapting to change.

SAFETY EVALUATION

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The position of First Executive Vice President - Operations has been eliminated to reduce the number of management levels without compromising effectiveness. However, the responsibility and functions have been divided between the Executive Vice President - Nuclear Generation and Executive Vice President - System Operations.

Section III IMPACT OF THE PROPOSED CHANGES

The proposed changes to the Technical Specifications are purely administrative in nature in that they reflect the corporate reorganization. Thus, the changes will not impact the operation of the plant as defined in the FSAR and SER.

The proposed changes are designed to improve and facilitate management control and efficiency. The chain of command has been streamlined, enhancing the organization's effectiveness and efficiency without compromising functions required for the continued safe operation of the plant. All personnel affected by the reorganization continue to meet the educational and experience levels described in the FSAR.

The position of Vice President - Design and Analysis has been eliminated, and the associated responsibilities and functions appropriate in supporting the operations of the Authority's nuclear power plants have been assumed by the Vice President - Nuclear Engineering. Consequently, the Vice President - Design and Analysis position has been eliminated from Safety Review Committee (SRC).

The elimination of one member of the SRCs voting board will not affect the function of the SRC. The quality of SRC decisions will not be adversely impacted since the remaining members of the board meet the academic knowledge and experience required in fulfilling the SRCs function. Additional expertise, if required, may still be attained through the utilization of a consultant. Additionally, the remaining members are sufficient in number to achieve the currently required quorum.

The Nuclear Generation Department's responsibilities to support safe operation of the Authority's nuclear facilities remain unchanged by the proposed management reorganization.

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Section IV EVALUATION OF SIGNIFICANT HAZARDOUS CONSIDERATIONS

The proposed changes are purely administrative in nature. Operation of the FitzPatrick plant in accordance with the proposed amendment would not involve significant hazards considerations as defined in 10 CFR 50.92, since it would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated because the reorganization of the Authority is purely administrative in nature and does not involve hardware or procedural changes to the facility. The chain of command has been streamlined, enhancing the organization's effectiveness and efficiency without compromising functions required for the continued safe operation of the plant. The changes will not adversely impact previously evaluated accidents.
- (2) create the possibility of a new or different kind of accident previously evaluated. As stated above, the reorganization is designed to enhance the management and efficiency of the Authority. The changes do not involve hardware or procedural changes to the facility and cannot create the possibility of a new or different kind of accident.
- (3) involve a significant reduction in the margin of safety, since all individuals affected by the reorganization described in this application continue to meet the educational and experience levels described in the FSAR for positions previously having these responsibilities. The proposed changes do not reduce safety margin of any kind.

The Authority considers that the proposed changes can be classified as not likely to involve significant hazards considerations since the changes are administrative in nature and do not involve procedural changes nor any changes to the plant's safety related structures, systems or components.

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Section V IMPLEMENTATION OF THE PROPOSED CHANGES

Implementation of these changes, as proposed, will not impact the ALARA or Fire Protection Programs at FitzPatrick, nor will the changes impact the environment.

Section VI CONCLUSION

The change as proposed does not constitute an unreviewed safety question as defined in 10 CFR 50.59, that is, it:

- a. will not change the probability or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report;
- b. will not increase the possibility of an accident or malfunction of a different type than any previously evaluated in the Safety Analysis Report;
- c. will not reduce the margin of safety as defined in the basis for any technical specification;
- d. does not constitute an unreviewed safety question; and
- e. involves no significant hazards consideration, as defined in 10 CFR 50.92.

Section VII REFERENCES

- 1. James A FitzPatrick Nuclear Power Plant Final Safety Analysis Report (FSAR).
- 2. James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER).