



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 77 TO FACILITY OPERATING LICENSE NO. NPF-2
AND AMENDMENT NO. 69 TO FACILITY OPERATING LICENSE NO. NPF-8
ALABAMA POWER COMPANY
JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-348 AND 50-364

1.0 INTRODUCTION

By letter dated April 28, 1988, Alabama Power Company (APCo) proposed changes to Technical Specifications (TS) 6.2.1, Offsite Organization, and 6.2.2, Facility Staff. The proposed changes would remove Figure 6.2-1, Offsite Organization for Facility Management and Technical Support, and Figure 6.2-2, Facility Organization, and replace them with a narrative description of the offsite and onsite organizations' functional requirements in TS 6.2.1. Guidance for these proposed changes to the TS was provided to licensees and applicants by Generic Letter (GL) 88-06, dated March 22, 1988.

2.0 BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications Sections 6.2.1 and 6.2.2, the administrative control requirements have referenced offsite and unit (onsite) organization charts that are provided as figures to these sections. On a plant specific basis, these organization charts have been provided by applicants and included in the TS issued with the operating license. Subsequent restructuring of either the offsite or unit 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 organization 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 (a lead-plant) 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 Part 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 TS 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to TS 6.2.2 to define qualification requirements of their unit staff.

By letter dated January 27, 1988, the staff issued Amendment No. 3 to Facility Operating License NPF-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. GL 88-06 provided this guidance to all power reactors.

3.0 EVALUATION

By letter dated April 28, 1988, APCo states that the proposed changes to the TS are in accordance with the guidance provided by GL 88-06. Our evaluation follows:

1. TS 6.2.1 and 6.2.2 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 were defined and added to TS 6.2.1. This is also consistent with the guidance provided in GL 88-06. The licensee states that implementation of these requirements will be documented in the Final Safety Analysis Report (FSAR) Update, as appropriate.
3. The existing organization chart for the facility staff did not stipulate senior reactor operator (SRO) or reactor operator (RO) license qualified positions. However, existing TS Table 6.2-1, Minimum Shift Crew Composition, lists the specific requirements for these positions. TS 6.2.2.g is added to specify SRO and RO requirements which were not in the existing Farley site TS.
4. Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee has confirmed that this documentation has been designated for inclusion in the next update of the FSAR, as noted above.
5. The licensee has verbally confirmed that no TS, other than those noted in item (1) above, include references to the figures of the organization charts that are being removed from the TS. Hence, this is not an applicable consideration, with regard to the need to redefine reference requirements, as a result of the removal of these figures.

On the basis of our review as discussed above, the staff concludes that the licensee has provided an acceptable response to these items as addressed in the NRC 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. Accordingly, the staff finds the TS proposed changes to be acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, or administrative procedures or requirements. 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.

5.0 CONCLUSION

The Commission made a proposed determination that the amendments involve no significant hazards consideration as published on June 6, 1988 in the Federal Register (53 FR 20700), and consulted with the State of Alabama. No public comments were received, and the State of Alabama 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. Dunning
E. Reeves
F. Allenspach

Dated: July 8, 1988