

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

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

# RELATED TO AMENDMENTS NOS. 109 AND 85 TO FACILITY OPERATING LICENSE

NOS. DPR-51 AND NPF-6

ARKANSAS POWER AND LIGHT COMPANY

ARKANSAS NUCLEAR ONE, UNIT NOS. 1 AND 2

DOCKET NOS. 50-313 AND 50-368

#### 1.0 INTRODUCTION

By letter dated December 4, 1987 and supplemented by information provided by letter dated April 14, 1988, Arkansas Power and Light Company (AP&L or the licensee) requested changes to the Administrative Controls sections of the Technical Specifications for Arkansas Nuclear One, Unit Nos. 1 and 2. The proposed amendments would revise Technical Specifications to reflect a reorganization of the Nuclear Operations Department of AP&L. In addition, the proposed amendments would revise the Technical Specifications pertaining to the management position designated to serve as the Plant Safety Committee Chairman.

# 2.0 EVALUATION

The proposed changes were reviewed using the applicable acceptance criteria of Sections 13.1.1, 13.1.2 and 13.4 of the Standard Review Plan (SRP). Our evaluations are provided hereinafter.

- 1. Title changes in the onsite Nuclear Operations Department:
  - a. The title Director, Site Nuclear Operations for the senior site management is changed to Executive Director, ANO Site Operations. This change is reflected in changes to Figures 6.2-1 and 6.2-2, and various other parts of TS Section 6.0.
  - b. The title General Manager, Plant Operations is changed to Plant Manager.
  - c. The title Quality Control (Q.C.) Superintendent is changed to Q.C/Q.E (Quality Engineering) Superintendent.

These title changes are acceptable since they are purely administrative changes to reflect the new organization.

### Organizational Changes

a. Figure 6.2-1 Management Organization Chart

Changes to the Nuclear Operations Department which reports directly to the Senior Vice President, Generation Transmission and Engineering, are briefly described below.

- (1) The Design Engineering Department is created and reports directly to the Vice President, Nuclear Operations. It performs the design engineering support function for nuclear operations formerly handled by the Engineering Department, which is no longer depicted on Figure 6.2-1, since it no longer has a nuclear support function.
- (2) The Nuclear Services Department is deleted. Additionally, the positions of Nuclear Programs Manager, Nuclear Services Manager, and Nuclear Engineering and Licensing Manager are deleted. The functions assigned to these groups included nuclear engineering, licensing, corporate off-site health physics, corporate fire protection, and emergency preparedness.

These functions are reassigned as follows:

Nuclear engineering - Design Engineering Department Licensing - Licensing Department (described below)

Emergency preparedness, fire protection, and Corporate Health Physics - Nuclear Oversight/Support Department (described below)

(3) The Nuclear Oversight/Support Department is created and reports directly to the Vice President, Nuclear Operations. The principal functions of this department are to provide staff support for the Safety Review Committee (SRC) and to provide corporate management oversight of various line functions.

As noted above, this new department will also perform the function of Corporate Health Physics. Because of this the "dotted line" responsibility from the Health Physics Superintendent to the now deleted Nuclear Programs Department Manager that was depicted on both Figures 6.2-1 and 6.2-2, is removed.

Also, as noted above, the corporate oversight for both fire protection, and emergency preparedness are provided by the Nuclear Oversight/Support Department. This is depicted on Figure 6.2-2.

The staff has reviewed the organization changes just described. The placing of the design engineering function for support of nuclear operations under direct control of the Vice President, Fuclear Operations, is viewed has a positive step which should result in more effective and direct support to the ANO site engineering and operations organizations.

The functions previously performed by the Nuclear Services Department appear to have been comprehensively transferred to other licensee departmental organizations.

The staff concludes that: (1) the proposed organizational structure provides for the integrated management of activities that support the safe operation and maintenance of the facilities, and (2) clear management control and effective lines of authority and communications exist between the organizational units involved in the management, operation, and technical support for the operation of the facilities. Therefore, the above described changes meet the applicable acceptance criteria of Section 13.1.1, "MANAGEMENT AND TECHNICAL SUPPORT ORGANIZATION", of the SRP and are acceptable to the staff.

- b. Figure 6.2-2 Functional Organization for Plant Operations Changes to the onsite organization are briefly described below.
  - (1) The position of Special Projects manager has been deleted. The onsite Licensing group which previously reported to the Special Projects Manager, is combined with the corporate Licensing group, under a single Licensing Manager who reports directly to the Executive Director, ANO Site Operations.
  - (2) The Plant Modifications Manager who formerly reported directly to the Executive Director, ANO Site Operations, now reports to the Plant Manager. This allows the Plant Manager to better integrate modification activities with other day to day operations and maintenance activities.
  - (3) The Engineering Manager, formerly reporting to the General Manager, Plant Support, now reports directly to the Executive Director, ANO Site Operations, reflecting increased emphasis on engineering support for operation and maintenance activities.

- (4) The Nuclear Budgets and Long Term Planning Department is created, reporting directly to the Executive Director, ANO Site Operations.
- (5) Portions of the subtier organizations within Maintenance, Engineering, and Plant Support have been deleted to allow future minor organizational changes without the need for a license amendment. For the same reason, some management titles have been replaced with the corresponding group or department title to show organizational function.

The staff has reviewed these changes and it appears they will enhance the effectiveness of the onsite management organization, particularly in the plant modifications and plant engineering support functions. In addition, the proposed site organization still maintains clear lines of authority to the Executive Director, Site Nuclear Operations and responsibility for all activities important to the safe operation of the facilities. Therefore, these changes meet the applicable acceptance criteria of Section 13.1.2 "OPERATING ORGANIZATION," and are acceptable of the staff.

3. Technical Specification 6.5.1.2 is revised to designate the General Manager, Plant Support as the Plant Safety Committee (PSC) Chairman. This was done because the Special Projects Manager position is deleted.

To compensate for the loss of a licensing representative on the PSC with the deletion of the Special Projects Manager position, a licensing representative was added.

Since the Technical Analysis Section reports to the General Manager, Plant Support, the designated PSC Chairman, the Technical Analysis representative on the PSC has been deleted.

Therefore both Licensing and Technical Analyses will continue to have input to the PSC. Since this change does not alter the required areas of expertise represented on the PSC nor lessen any personal qualification requirements of its members, but simply designates a new staff position to serve as the PSC chairman, the staff finds the proposed change acceptable.

# 3.0 ENVIRONMENTAL CONSIDERATION

The amendments relate to changes in 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 the amendments.

#### 4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: June 24, 1988