



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NOS. 155 AND 94 TO

FACILITY OPERATING LICENSES DPR-57 AND NPF-5

GEORGIA POWER COMPANY
OGLETHORPE POWER CORPORATION
MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA
CITY OF DALTON, GEORGIA

EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-321 AND 50-366

1.0 INTRODUCTION

By letter dated May 6, 1988, supplemented June 7, 1988, Georgia Power Company (GPC) proposed to replace Technical Specification (TS) Figure 6.2.1-1, "Offsite Organization," and TS Figure 6.2.2-1, "Unit Organization," with a narrative description of the offsite and onsite organizations' functional requirements. Guidance for these proposed changes to the TS was provided to licensees and applicants by Generic Letter (GL) 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements" 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 of 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 May 6, 1988, supplemented June 7, 1988, GPC states that the proposed changes to the TS are in accordance with the guidance provided by GL 88-06. The NRC staff evaluation follows:

1. GPC requested the deletion of Figures 6.2.1-1 (Offsite Organization) and 6.2.2-1 (Unit Organization) from the Technical Specifications. In conjunction with this change, Section 6.2-1 will be revised to delete references to the figures and to add general requirements that capture the essential elements of the organizational structure. The licensee has stated that equivalent information to that contained in the organization charts will be documented in the Final Safety Analysis Report.

We find this requested change acceptable as it conforms to the guidance of Generic Letter 83-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements."

2. GPC requested the revision of Sections 6.5.1.6.e, 6.5.1.7.c, 6.5.1.8., 6.5.2.2, 6.5.2.3, 6.5.2.8.g, 6.5.2.9, 6.5.2.10.a, 6.5.2.10.b, 6.5.2.10.c, 6.6.1.b, 6.7.1.b, and 6.7.1.d to change the reference in each of these sections from Senior Vice President-Nuclear Operations to the new title of Vice President-Nuclear.

We find these requested changes acceptable as the position of Vice President-Nuclear is a sufficiently high level corporate position to implement the responsibilities designated within each of these sections.

3. GPC requested the revision of Sections 6.1.0, 6.5.1.6.e, 6.5.1.7.c, 6.5.1.8, 6.6.1.b, 6.7.1.b, and 6.7.1.d, to change the reference in each of these sections from Vice President-Plant Hatch to General Manager-Nuclear Plant.