



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 6 TO FACILITY OPERATING LICENSE NPF-68

GEORGIA POWER COMPANY, ET AL

DOCKET NO. 50-424

VOGTLE ELECTRIC GENERATING PLANT, UNIT 1

1.0 INTRODUCTION

By letter dated May 6, 1988, supplemented June 1, 1988, Georgia Power Company (GPC) proposed to replace Technical Specification (TS) Figure 6.2-1, "Offsite Organization," and TS Figure 6.2-2, "Plant 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. 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 1, 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 (Offsite Organization) and 6.2-2 (Plant 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 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements."

2. GPC requested the revision of Sections 6.2.3, 6.4.1, 6.4.2, 6.5.1 and 6.6.1 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 position to implement the responsibilities designated within each of these sections.

3. GPC requested the revision of Sections 6.1.1, 6.1.2, 6.2.2, 6.4.1, 6.6.1, 6.7.3, 6.12, 6.13, and 6.14 to change the reference in each of these sections to the new title of General Manager-Nuclear Plant from General Manager-Vogtle Nuclear Operations.

We find the requested changes acceptable as the title General Manager-Nuclear Plant is synonymous with the title General Manager - Vogtle Nuclear Operations.

4. GPC requested the deletion of the requirement in Section 6.2.3.4 that records of activities of the Independent Safety Engineering Group (ISEG) be forwarded through the Manager-Nuclear Performance and Analysis to the Vice President-Nuclear.

We find this requested change acceptable as there is no requirement that ISEG records be forwarded through the Manager-Nuclear Performance and Analysis.

On the basis of its review as discussed above, the NRC 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 NRC 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 NRC staff finds the TS changes to be acceptable.

3.0 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.

4.0 CONCLUSION

The Commission made a proposed determination that the amendments involve no significant hazards consideration as published on June 3, 1988 in the Federal Register (53 FR 20398), and consulted with the State of Georgia. No public comments were received, and the State of Georgia 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: F. Allenspach, LPEB/DLPQ
J. Hopkins, PDII-3/DRP-I/II

Dated: July 11, 1988