



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 41 TO

FACILITY OPERATING LICENSE NO. NPF-38

LOUISIANA POWER AND LIGHT COMPANY

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated May 20, 1988, Louisiana Power and Light Company (LP&L or the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-38) for Waterford Steam Electric Station, Unit 3. The proposed changes would remove Figure 6.2-1, Offsite Organization, and Figure 6.2-2, Unit Organization, and replace them with a narrative description of the offsite and onsite organizations functional requirements in Technical Specification (TS) 6.2.1 [and unit staff qualifications in 6.2.2]. Guidance for these proposed changes to the TS was provided to licensees and applicants by Generic Letter 88-06, dated March 22, 1988.

2.0 BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 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 organizational structure, the nuclear industry has highlighted this 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 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 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 Specification 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to Specification 6.2.2 to define qualification requirements of the 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 organizational charts from TS. Generic Letter 88-06 provided this guidance to all power reactors.

3.0 EVALUATION

The licensee's proposed changes to its TS are in accordance with the guidance provided by Generic Letter 88-06 and addressed the items listed below.

- (1) Specifications 6.2.1 and 6.2.2 were revised to delete the references to Figures 6.2-1 and 6.2-2 that were removed from the TS.
- (2) Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.2.1, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in the Waterford 3 updated FSAR.
- (3) The senior reactor operator and reactor operator license qualified positions of the unit staff were added to Specification 6.2.2. Therefore, this requirement that was identified on the organization chart for the unit staff will be retained.
- (4) Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee had confirmed that this documentation currently exists in the FSAR and will be maintained in accordance with 30 CFR 50.71(e).
- (5) The licensee has confirmed that no specifications, other than those noted in item (1) above, include references to the figures of the organization charts that are being removed from TS for their plant. Hence, this is not an applicable consideration, with regard to the need to redefine referenced requirements as a result of the removal of these figures.

On the basis of its review of the above items, 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 to 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 Generic Letter 80-06. Accordingly, the staff finds the proposed changes to be acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets 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 amendment.

5.0 CONCLUSION

The Commission made proposed determinations that the amendment involves no significant hazards consideration, which were published in the Federal Register (53 FR 22402) on June 15, 1988. The Commission consulted with the State of Louisiana. No public comments were received, and the State of Louisiana 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 the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: July 19, 1988

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