



OLIVER D. KINGSLEY, JR.
Vice President
Nuclear Operations

88 JUL 21 09:15
July 15, 1988

U. S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 25
Atlanta, Georgia 30323

Attention: Dr. J. Nelson Grace, Regional Administrator

Dear Dr. Grace:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Request for Enforcement
Discretion to Implement
Organization Changes
AECM-88/0145

The purpose of this letter is to request that enforcement discretion be exercised on Grand Gulf Nuclear Station (GGNS) Technical Specification section 6.5.1.2 and Figures 6.2.1-1 and 6.2.2-1 to allow System Energy Resources, Inc. (SERI) to implement a planned organizational change on July 18, 1988.

As discussed with members of your staff and NRR on July 13, 14 and 15, SERI intends to consolidate the engineering expertise currently residing in four distinct sections of the on-site organization into a new Performance and System Engineering (P&SE) Department. This new organization will enhance the operations of GGNS by providing a more focused management approach to plant engineering functions and a more effective and productive use of site engineering capabilities. Formation of the P&SE Department will eliminate duplication of engineering tasks currently being performed in various site organizations. The attachment to this letter provides additional information regarding the planned organizational change.

The planned organization change is consistent with the findings and recommendations of the 1987 Institute of Nuclear Power Operations evaluation of GGNS. The planned change is unrelated and independent of the proposed Middle South Utilities, Inc. and SERI Nuclear consolidation described by SERI letter to the NRC dated July 1, 1988 (AECM-88/0130).

The proposed change involves only the Nuclear Operations site organization and does not affect the existing dedicated SERI organization supporting GGNS, including the Nuclear Plant Engineering organization.

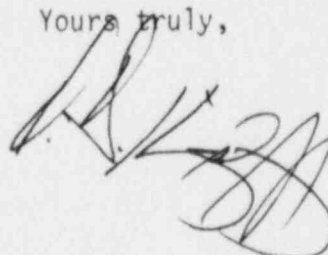
8808040113 880715
PDR ADOCK 0500041&
P PNU

GGNS Technical Specification 6.5.1.2 and Figures 6.2.1-1 and 6.2.2-1 requires revision to reflect the new organization. In AECM-88/0106, dated June 3, 1988, SERI requested removal from the Technical Specification Figures 6.2.1-1 and 6.2.2-1 which depict the onsite and offsite SERI organization. This amendment request was in accordance with the guidance of Generic Letter 88-06. SERI submitted in AECM-88/0128, dated July 15, 1988, a proposed amendment to change the composition of the Plant Safety Review Committee specified in Technical Specification 6.5.1.2.

The planned organization changes represent a clear improvement in the use of site engineering resources and SERI feels it is advantageous to implement these improvements as soon as possible. Enforcement discretion will enable SERI to realize the immediate benefits of the organizational changes until the proposed technical specification amendments are approved. As an interim compensatory measure the Technical Support Superintendent will remain on the Plant Safety Review Committee until the proposed technical specification amendments are approved.

Your assistance and cooperation in this matter are appreciated.

Yours truly,

A handwritten signature in black ink, appearing to be 'L. L. Kintner', written over a horizontal line.

ODK:rg
Attachment

cc: Mr. T. H. Cloninger (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)
Mr. R. C. Butcher (w/a)

Mr. L. L. Kintner, Project Manager (w/a)
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop 14B20
Washington, D.C. 20555

Additional Information Regarding The Formation of
The Performance and System Engineering Department

Presently, the engineering expertise of the plant staff organization resides in four distinct sections: Technical Engineering, Reactor Engineering, Plant Modification and Construction (PM&C), and Maintenance Engineering (I&C, Mechanical and Electrical, Planning & Scheduling) as shown in Figure 1. With this separation of the plant engineering expertise a clear division of responsibility does not exist. This contributes to some degree of confusion and misunderstanding, which in turn detracts from SERI's full capability to effectively and efficiently resolve plant problems.

Plant staff engineering is being consolidated into the Performance and System Engineering (P&SE) Department under a new position, the Manager P&SE. P&SE will be formed by consolidating various engineering staffs - those in Technical Engineering, Reactor Engineering, PM&C, and Maintenance Engineering. P&SE will serve as a single source of engineering expertise on plant systems. This strengthened organization will enhance the operation of Grand Gulf Nuclear Station (GGNS) by providing a focused management approach to plant engineering functions. By consolidating the plant engineering expertise, duplication of engineering tasks within the various organizations will be essentially eliminated. Consolidating resources will mean a more effective use of engineering capabilities on site.

The formation of the plant staff engineering organization is independent of the proposed overall SERI consolidation described in the SERI letter (AECM-88/0130) dated July 1, 1988 and is not being done to accommodate the integration of the other nuclear facilities. Likewise, the realignment will not affect the SERI offsite support functions including the design engineering organization, Nuclear Plant Engineering (NPE). In fact, the realignment is designed to improve the interface between NPE and plant staff in the areas of maintenance, engineering, and operations.

The Manager, P&SE will be responsible for activities necessary to support the operations of GGNS, Unit 1. This includes System Engineering management, Inservice Inspection Program management, Reactor Engineering management and the engineering support of maintenance and operations. The Manager, P&SE will report to the GGNS General Manager and will be assisted by the System Engineering Superintendent, the Reactor Engineering Superintendent and the Engineering Support Superintendent.

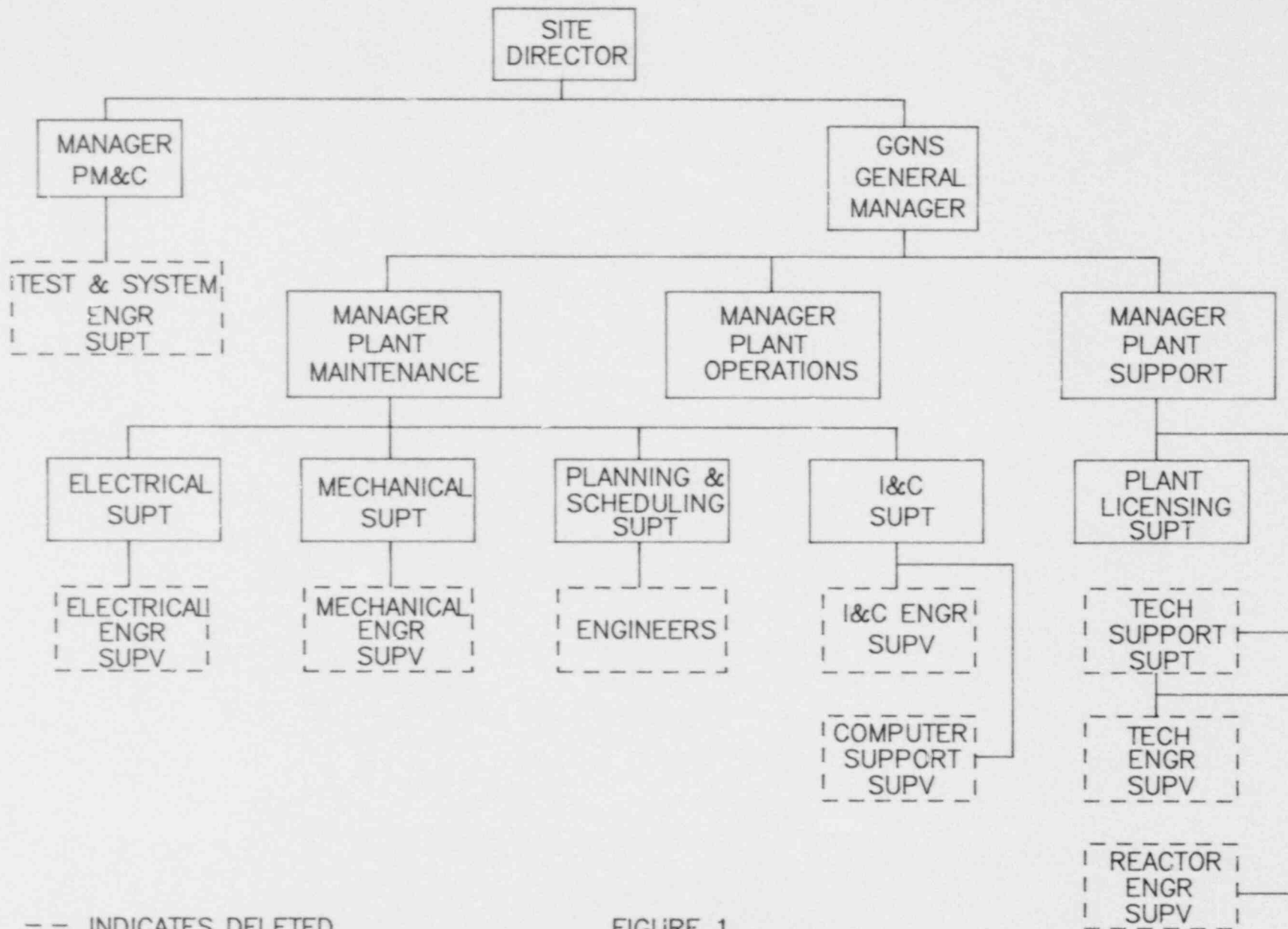
The System Engineering Superintendent will be responsible for plant staff system engineering functions. The system engineering function will provide system engineers who have overall system and component expertise on their assigned systems. He will be responsible for technical activities associated with design changes, the collection, collating and evaluation of data, reliability analysis and root cause analysis. The System Engineering Superintendent will have three System Engineering Supervisors under his direction and will report to the Manager, P&SE.

The Engineering Support Superintendent will provide administrative support to the Manager, P&SE. He will also be responsible for those portions of programs such as Inservice Inspection, Thermal Performance Monitoring and Equipment Qualification assigned to the plant staff. The Engineering Support Superintendent will have two supervisors, the Inservice Inspection Supervisor and Engineering Support Supervisor, under his direction and will report to the Manager, P&SE.

The Reactor Engineering Superintendent will be responsible for onsite core management and periodic reactor testing, in-plant nuclear materials control and accountability, and providing assistance to reactor operators during control rod pattern adjustments. The Reactor Engineering Superintendent will report to the Manager, P&SE.

As a part of the organizational realignment, the Technical Support Superintendent position is being deleted. The Technical Support Superintendent is currently a member of the Plant Safety Review Committee (PSRC) as indicated in Technical Specification (TS) 6.5.1.2. Therefore, with this position being deleted the following administrative change is needed to TS 6.5.1.2: replace the Technical Support Superintendent with the Manager, P&SE.

TS Figure 6.2.1-1 and 6.2.2-1 provide the organizational charts associated with GGNS and would require changes with this reorganization; however, a proposed TS change was submitted by SERI letter (AECM-88/0106) dated June 3, 1988 that will remove these figures from the TS. This proposed organizational realignment has been evaluated against the criteria of 10CFR50.59 and determined not to constitute an unreviewed safety question. Also, the appropriate Updated Final Safety Analysis Report (UFSAR) change request has been initiated to have the UFSAR reflect the organizational changes.



- - - INDICATES DELETED
 OR
 CHANGED POSITION

FIGURE 1

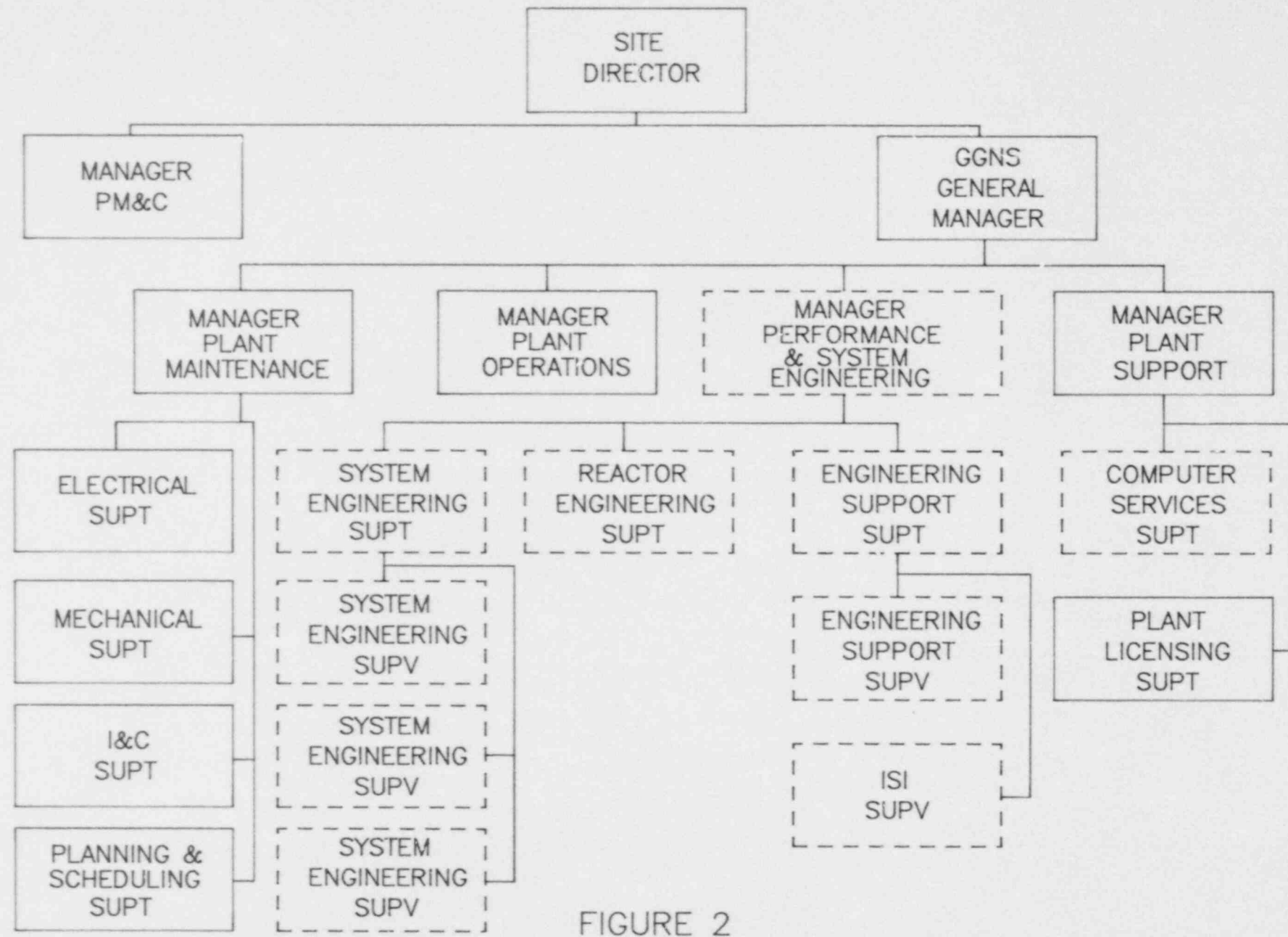


FIGURE 2

--- INDICATES REALIGNED OR NEW POSITION