



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 29 TO FACILITY OPERATING LICENSE NO. DPR-80
AND AMENDMENT NO. 28 TO FACILITY OPERATING LICENSE NO. DPR-82
PACIFIC GAS AND ELECTRIC COMPANY
DIABLO CANYON NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-275 AND 50-323

1.0 INTRODUCTION

By letter dated May 20, 1988, Pacific Gas and Electric Company (PG&E or the licensee) requested amendments to the Technical Specifications (TS) appended to Facility Operating License Nos. DPR-80 and DPR-82 for the Diablo Canyon Nuclear Power Plant, (DCNPP) Unit Nos. 1 and 2. The proposed amendments would change the DCNPP Combined Technical Specifications by revising TS Section 6.2, "Administrative Controls," to remove Figure 6.2-1 "Offsite Organization" and Figure 6.2-2 "Plant Organization". General requirements that address the essential aspects of the organizational structure that are defined by the existing organization charts are added. These amendments also change the titles of certain Plant Staff Review Committee members in Administrative Controls Sections 6.2.2, 6.3, 6.5.1.2, and 6.12.1.

2.0 EVALUATION

The NRC staff has evaluated the proposed changes and has concluded that they are acceptable. The staff's evaluation is given below.

A. Removal of Licensee Organization Charts from the TS

The content required in the Administrative Controls Section of the Technical Specifications is specified in 10 CFR 50.36.c(5). That provision requires that the technical specifications contain provisions relating to organization and management procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner. It does not specifically require inclusion of organizational charts in the technical specifications.

In Generic Letter (GL) 88-06, "Removal of Organizational Charts from Technical Specification Administrative Controls Requirements", dated March 22, 1988, the NRC has provided guidance for the removal of organization charts from the TS. Generic Letter 88-06 concludes that

the removal of organization charts from the technical specifications will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure.

With regard to Diablo Canyon, the licensee states that removal of the organization charts from the technical specifications will not affect plant operations. Specific operational requirements are detailed in other technical specifications that bear more directly on operational safety than the organization charts.

As in the past, the NRC will continue to be informed of organizational changes and management personnel titles through other required controls. For example, 10 CFR Part 50.34(b)(6)(i) requires that the applicant's organizational structure be included in the FSAR. Consistent with Generic Letter 88-06, Section 13.1 of the FSAR Update currently provides a functional description of the organization, a functional description of key personnel positions, and detailed organization charts. The organization charts in the DCCP FSAR Update are more detailed than those presently in the technical specifications. As required by 10 CFR 50.71(e), the licensee submits annual revisions to the FSAR Update.

The removal of the organization charts and title changes represent no reduction in the current safety requirements, because the following conditions are included in the technical specifications by these amendments, per the recommendations of GL 88-06:

- (1) A requirement that lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or equivalent forms of documentation.
- (2) Designation of an executive position that has corporate responsibility for overall plant nuclear safety and authority to take such measures as may be needed to ensure acceptable performance of staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- (3) Designation of a management position in the onsite organization that is responsible for overall unit operation and has control over those onsite activities necessary for safe operation and maintenance of the plant.

- (4) Designation of those positions in the onsite organization that require a senior reactor operation (SRO) or reactor operation license.
- (5) Provisions of sufficient organizational freedom to be independent of operational pressures to those individuals who perform the functions of health physics, quality assurance, and training of operating staff.

As discussed above, because removal of licensee organization charts from the DCNPP TS meets the requirements of 10 CFR 50.36, and because these amendments meet the guidelines of Generic Letter 88-06, the NRC staff finds them acceptable.

B. Changes in Titles of Plant Staff Review Committee Members

In addition to removal of the organization charts, these amendments make changes in the titles of certain Plant Staff Review Committee members. These changes are being made to reflect recently proposed organizational changes.

Both the change to the titles of certain Plant Staff Review Committee members and the change to reflect that the Plant Manager (rather than Plant Superintendent) is authorized to make changes to the guidelines for plant staff working hours are administrative changes to reflect the proposed new DCPF organization. These changes do not affect the number of members, composition, or function of the DCNPP Plant Staff Review Committee. On this basis, the NRC staff finds these changes to be acceptable.

3.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Chief of the Radiological Health Branch, State Department of Health Services, State of California, of the proposed determination of no significant hazards consideration. No comments were received.

4.0 ENVIRONMENTAL CONCLUSION

These amendments involve changes in administrative procedures and requirements. Accordingly, these 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.

5.0 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 (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.

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Dated: July 25, 1988