



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 45 TO FACILITY OPERATING LICENSE NO. NPF-29
MISSISSIPPI POWER & LIGHT COMPANY
SYSTEM ENERGY RESOURCES, INC.
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION
GRAND GULF NUCLEAR STATION, UNIT 1
DOCKET NO. 50-416

1.0 INTRODUCTION

By letter dated May 21, 1988, as revised June 3, 1988, System Energy Resources, Inc. (the licensee), requested an amendment to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. The proposed amendment would change Technical Specifications (TS) 6.2.1, "Offsite Organization," and 6.2.2, "Unit Staff." The proposed changes would remove Figure 6.2.1-1, "Offsite Organization," and Figure 6.2.2-1, "Unit Organization," and replace them with a narrative description of the offsite and onsite organizations' functional requirements in TS 6.2.1 and unit staff qualifications in 6.2.2. Guidance for these proposed changes to the TS was provided to the licensee by Generic Letter 88-06, "Removal of Organization Charts from Technical Specifications," 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 applications 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.

Because of these limitations on effecting changes to the organizational 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 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 in the TS upon 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 NFP-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. Generic Letter 88-06 provided this guidance to all power reactors.

3.0 EVALUATION

The proposed changes to the TS are in accordance with the specific guidance provided by Generic Letter 88-06, except that a qualification requirement for three of the four top management positions on TS Figure 6.2.2-1, "Unit Organization," would not be retained in the TS. The present Figure 6.2.2-1 requires that each of the persons in these four positions must have been a licensed senior reactor operator (SRO) or have been certified on a plant of this type. The three positions for which this requirement would not be retained in the TS are the GGNS General Manager, who has overall responsibility for plant operation, and two of the managers who report to him (Manager, Plant Maintenance and Manager, Plant Support). This qualification requirement would be retained in the TS for the fourth position, Manager, Plant Operations, which also reports to the GGNS General Manager. The licensee has concluded that this qualification is essential for the position of Manager, Plant Operations because of this position's direct influence upon safe plant operations. The licensee also concluded that the other three positions for which this qualification would not be retained in the TS do not exert direct influence upon the licensed operations personnel at the facility.

The NRC staff has evaluated the licensee's proposed change in qualification requirements for the onsite organization. The NRC staff acceptance criteria for qualifications of plant operations personnel are given in NUREG-0800, "Standard Review Plan (SRP)," Section 13.1.2 - 13.1-3, Paragraph II.G. This SRP paragraph refers to Regulatory Guide 1.8, "Personnel Selection and Training," which endorses ANSI N18.1 for the qualifications of plant personnel. Section 4.2 of ANSI N18.1 requires that at the time of initial core loading or appointment to the position, the operations manager shall hold a senior reactor operator's license. ANSI N18.1 does not require the plant manager, maintenance manager or technical manager to have this qualification. The licensee's proposed

qualification requirement for the Manager, Plant Operations, is equivalent to the ANSI N18.1 requirement because it requires the person to have received SRO training, but does not require a current SRO license. The licensee's proposed deletion of this qualification requirement from the TS for the GGNS General Manager, Manager, Plant Maintenance, and Manager, Plant Support, is in accordance with ANSI N18.1, which does not require these three managers to have this qualification. Accordingly, the staff concludes that the licensee's proposed retention of this qualification in the TS for only the Manager, Plant Operation, meets the requirements of ANSI N18.1, Regulatory Guide 1.8, and SRP 13.1-2 - 13.1-3 and is, therefore, acceptable.

The remainder of the licensee's proposed changes are in accordance with the specific 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 6.2.1-1 and 6.2.2-2 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 UFSAR.
3. The senior reactor operator 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 has confirmed that this documentation currently exists in the UFSAR.
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, the requirement in Generic Letter 88-06 to redefine referenced requirements as a result of the removal of these figures is not an applicable consideration for this license amendment.

On the basis of its review, 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 of the 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 88-06. Accordingly, the staff finds the proposed changes to be acceptable.

4.0 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.

5.0 CONCLUSION

The Commission made a proposed determination that this amendment involves no significant hazards consideration, which was published in the Federal Register (53 FR 24513) on June 29, 1988, and consulted with the State of Mississippi. No public comments or requests for hearing were received, and the State of Mississippi did not have any comments.

The staff has 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 the issuance of this amendment will not be inimical to the common defense and the security, or to the health and safety of the public.

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Dated: July 29, 1988

AMENDMENT NO. 45 TO FACILITY OPERATING LICENSE NO. NPF-29 - GRAND GULF

Docket File

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