

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager - Nuclear Plant shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor or during his absence from the Control Room a designated individual shall be responsible for the Control Room command function. A management directive to this effect, signed by the Senior Vice President responsible for Nuclear Generation, hereafter referred to as Senior Vice President, shall be reissued on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These 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 in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The General Manager-Nuclear Plant shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Senior Vice President shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

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6.2.2 FACILITY STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the Control Room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room while the unit is in MODE 1, 2, 3 or 4.
- c. A Health Physics Technician* shall be on site when fuel is in the reactor.
- d. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times.* The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., Senior Reactor Operators, Reactor Operators, Health Physics Technicians, Auxiliary Operators, and key maintenance personnel. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the plant is operating.

In the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

1. An individual will not be permitted to work more than 16 hours straight (not including shift turnover time).
2. There will be a break of at least 8 hours (which can include shift turnover time) between work periods.

* The Health Physics Technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of the Health Physics Technician and/or Fire Brigade members provided immediate action is taken to restore the Health Physics Technician and/or Fire Brigade to within the minimum requirements.

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3. An individual will not work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period (all excluding shift turnover time).
 4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.
 5. Any deviation from the above guidelines for the minimum shift complement defined in Technical Specification Table 6.2-1 and health physics technicians shall be reviewed and approved by the General Manager - Nuclear Plant, his designee (Emergency Director) or higher authority. Any deviation from the above guidelines for key maintenance personnel shall be reviewed and approved by the Maintenance Manager or his designee (group supervisor).
- g. The Assistant General Manager - Plant Operations, Operations Manager and Shift Supervisors shall hold a senior reactor operator license. The Reactor Operators shall hold a reactor operator license.

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- g. The Assistant General Manager - Plant Operations, Operations Manager and Shift Supervisors shall hold a senior reactor operator license. The Reactor Operators shall hold a reactor operator license.

ATTACHMENT 2

SIGNIFICANT HAZARDS CONSIDERATION EVALUATION
PURSUANT TO 10 CFR 50.92 FOR THE PROPOSED CHANGE
TO REMOVE THE ORGANIZATION CHARTS FROM
THE TECHNICAL SPECIFICATIONS

PROPOSED-CHANGE:

Revise Technical Specification 6.2.1 and 6.2.2 to remove the onsite and offsite organization charts and add certain general requirements that capture the essential aspects of the organizational structure that are currently defined by the organization charts.

BACKGROUND:

On March 22, 1988 the NRC staff issued Generic Letter 88-06 which provides guidance for the removal of organization charts from the administrative control requirements of the Technical Specifications. This proposed change is consistent with the guidance provided in Generic Letter 88-06.

Regulatory requirements for administrative controls in the Technical Specifications are provided in 10 CFR 50.36. This regulation states that administrative controls are the provisions relating to organization and management necessary to ensure operation of the facility in a safe manner. In addition to the organization charts, the Technical Specifications contain specific operational requirements that bear more directly on operational safety. For example, the organizational element responsible for the control room command function is specified in Technical Specification 6.1.2 and the minimum shift crew composition requirements can be found in Table 6.2-1. The requirements for the Shift Technical Advisor are specified in Technical Specification 6.2.4 and the organizational management functions for independent reviews and audits (Safety Audit and Engineering Review Group, Plant Operations Review Committee, and the Nuclear Operations Review Board) are found in Specifications 6.2.3, 6.5.1 and 6.5.2. Furthermore, Specification 6.5.3 contains additional requirements for technical review and control.

The only aspects of organization charts which are not covered by other specifications are as follows:

1. A requirement that lines of authority, responsibility, and communication be established and maintained from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated in the Joseph M. Farley Nuclear Plant Units 1 and 2 Final Safety Analysis Report Update, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation.

Attachment 2
Significant Hazards Consideration Evaluation
Pursuant to 10CFR50.92 for the Proposed Change
To Remove the Organization Charts From
The Technical Specification

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 operator (SRO) or reactor operator (RO) 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 the operating staff.

With the addition of the above general requirements to the Technical Specifications, the organization charts can be removed with no reduction in current safety requirements. This allows Alabama Power Company the flexibility to make adjustments in the organizational structure without first having to obtain approval from the NRC through the issuance of a license amendment to update organization charts. This also frees the NRC staff from reviewing these proposed amendments which would have no impact on plant safety.

ANALYSIS:

Alabama Power has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed change to remove the organization charts and consider the proposed change not to involve a significant hazards consideration.

In support of this conclusion, the following analysis is provided:

1. The proposed change will not increase the probability or consequences of an accident previously evaluated. The Code of Federal Regulations, Title 10, Part 50.34(b)(6)(i) requires that the organizational structure be included in the Final Safety Analysis Report (FSAR). Chapter 13 of the FSAR provides a description of the organization and detailed organization charts. As required by 10 CFR 50.71(e), Alabama Power Company will maintain the organizational description in the FSAR current. Therefore, the NRC will continue to be informed of organizational changes. With the existing technical specification requirements and the proposed additional requirements the deletion of the organization charts will not result in a decrease in safety requirements. Therefore, the probability or consequences of an accident previously evaluated will not change.

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2. The proposed change will not create the possibility of a new or different kind of accident previously evaluated. The proposed change is administrative in nature and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed. Therefore, the proposed change will not create the possibility of a new or different kind of accident previously evaluated.
3. The proposed change will not involve a reduction in a margin of safety. The existing organizational requirements in the Technical Specifications combined with the proposed additional requirements will ensure that there is no reduction in current safety requirements. Therefore, the proposed change will not involve a reduction in a margin of safety.

CONCLUSION:

Based upon the analysis provided herein, Alabama Power Company has determined that the proposed change will not increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a reduction in a margin of safety. Therefore, Alabama Power Company has determined that this proposed change meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.