



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 87 TO

FACILITY OPERATING LICENSE NO. NPF-6

ARKANSAS POWER AND LIGHT COMPANY

ARKANSAS NUCLEAR ONE, UNIT NO. 2

DOCKET NO. 50-368

1.0 INTRODUCTION

By letter dated June 10, 1988, Arkansas Power and Light Company (AP&L or the licensee) requested amendments to the Technical Specifications (TSs) appended to Facility Operating License No. NPF-6 for Arkansas Nuclear One, Unit 2 (ANO-2). The proposed amendment would remove Figure 6.2-1, "Management Organization Chart" (offsite) and Figure 6.2-2, "Functional Organization for Plant Operations," 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, 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 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 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 off-site 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 organization 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 Quality Assurance (QA) Manual Operations.
- (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 organizational relationships in the form of organization charts, the licensee has confirmed that this documentation has been designated for inclusion to the next update of the QA Manual Operations.
- (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 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

The amendment involves a change in Administrative procedures and requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 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 amendments involve no significant-hazards consideration, which were published in the Federal Register (53 FR 26519) on July 13, 1988. The Commission consulted with the State of Arkansas. No public comments were received, and the State of Arkansas 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, and (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.

Date: August 18, 1988

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