



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 13 TO FACILITY OPERATING LICENSE NO. NPF-58
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, ET AL.
PERRY NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-440

1.0 INTRODUCTION

By letter dated April 8, 1988, The Cleveland Electric Illuminating Company, et al. (CEI), the licensees, proposed changes to Technical Specifications (TS) 6.2.1, Corporate, and 6.2.2, Unit Staff and other sections of the TS. This Safety Evaluation is concerned only with those portions of the proposed changes which would remove Figure 6.2.1-1, Corporate 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. Guidance for these proposed changes to the TS was provided to licensees and applicants 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 which 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 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 licensees and applicants.

3.0 EVALUATION

The licensees' proposed changes to its TS are in accordance with the guidance provided by Generic Letter 88-06 and have 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 6.2.2-1 that were removed from the TS.
- (2) Functional requirements of the offsite and onsite organizations were defined and added to Technical 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 Updated Safety Analysis Report (USAR) and updated in accordance with 10 CFR 50.71(e).
- (3) The organization chart for the unit staff does not stipulate senior reactor operator or reactor operator license qualified positions. Hence, this is not an applicable consideration related to the removal of the organization charts from the TS for Perry plant.
- (4) Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensees have confirmed that this documentation currently exists in the USAR.
- (5) The licensees have 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 licensees have 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. The staff notes that one additional change is included with the addition of the functional requirements of the onsite and offsite organizations to TS 6.2.1; that is, changing the title of "Manager," Perry Plant Operations Department, to "General Manager." As this relates to a title change only and does not involve changes in duties or responsibilities, it is acceptable to the staff.

Accordingly, the staff finds the proposed changes to be acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping reporting, or administrative procedures or requirements. Accordingly, the amendment meets 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 this amendment.

5.0 CONCLUSION

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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: June 30, 1988