



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 27 TO FACILITY OPERATING LICENSE NO. NPF-47
GULF STATES UTILITIES COMPANY
RIVER BEND STATION, UNIT 1
DOCKET NO. 50-458

1.0 INTRODUCTION

By letter dated June 21, 1988, Gulf States Utilities Company (GSU) (the licensee) requested an amendment to Facility Operating License No. NPF-47 for the River Bend Station, Unit 1. The proposed amendment would delete Figure 6.2.1-1, River Bend Station Organization and Figure 6.2.2-1, River Bend Station Organization, from the Technical Specifications (TS) and replace them with a narrative description of the River Bend Nuclear Group organization structure functional requirements in Section 6.2.1 and unit staff qualifications in Section 6.2.2 of the TS. Guidance for these proposed changes to the TS was provided to licensees and applicants by Generic Letter 88-06, dated March 22, 1988. This amendment would also delete a duplicative address for correspondence in Section 6.9.1.6 of the TS.

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

8809020212 880829
PDR ADOCK 05000458
P PIC

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 6.2.1-1 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 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.
- (3) Where qualifications for certain positions are currently designated by organization charts as requiring a Senior Reactor Operator or Reactor Operator license, they have been added to Specification 6.2.2. Therefore, this requirement that was identified for these positions on organization charts 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 is incorporated in the River Bend Updated Safety Analysis Report. Any changes will be included in the annual updates.
- (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.

Section 6.9.1.b of the TS contains address instructions for mailing monthly operating reports. The licensee proposed to delete these address instructions because they are duplicative of address instructions in Section 6.9.1 that are in accordance with 10 CFR 50.4. This change has no safety implication and will eliminate a duplicative and conflicting submittal requirement. The staff finds this administrative change is acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates 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 this amendment.

5.0 CONCLUSION

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 the amendment will not be inimical to the common defense and security or to the health and safety of the public. The staff therefore concludes that the proposed changes are acceptable, and they are hereby incorporated into the River Bend Unit 1 Technical Specifications.

Date: August 29, 1988

Principal Contributor: W. Paulson