



OLIVER D. KINGSLEY, JR.
Vice President
Nuclear Operations

May 2, 1988

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Implementation of GL 88-06: Revision
to Technical Specifications Section 6.0
Proposed Amendment to the Operating
License (PCOL-88/06)
AECM-88/0085

System Energy Resources, Inc. (SERI) is submitting by this letter a proposed amendment to the Grand Gulf Operating License to implement the Technical Specification changes encouraged by Generic Letter 88-06. The proposed amendment replaces the organization charts in Technical Specifications Section 6.0 with more general organizational requirements. The proposed amendment conforms to the guidance provided in Generic Letter 88-06.

In accordance with the provisions of 10 CFR 50.4 and 50.30, the signed original of the requested amendment is enclosed and the appropriate copies will be distributed. The attachment provides the technical justification and discussion to support the requested amendment. This amendment has been reviewed and accepted by the Plant Safety Review Committee and the Safety Review Committee.

Based on the guidelines presented in 10 CFR 50.92, SERI has concluded that this proposed amendment involves no significant hazards considerations.

In accordance with the requirements of 10 CFR 170.21, an application fee of \$150 is attached to this letter.

Yours truly,

ODK:bms

Attachments: 1. Remittance of \$150 Application Fee
2. Affirmation per 10 CFR 50.30
3. GGNS PCOL-88/06

cc: (See Next Page)

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BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

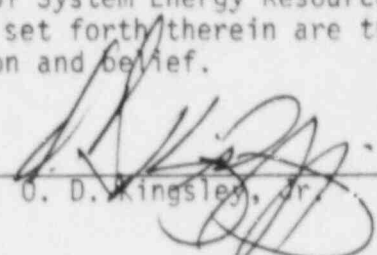
LICENSE NO. NPF-29

DOCKET NO. 50-416

IN THE MATTER OF
MISSISSIPPI POWER & LIGHT COMPANY
and
SYSTEM ENERGY RESOURCES, INC.
and
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

AFFIRMATION

I, O. D. Kingsley, Jr., being duly sworn, state that I am Vice President, Nuclear Operations of System Energy Resources, Inc.; that on behalf of System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by System Energy Resources, Inc. to sign and file with the Nuclear Regulatory Commission, this application for amendment of the Operating License of the Grand Gulf Nuclear Station; that I signed this application as Vice President, Nuclear Operations of System Energy Resources, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.



O. D. Kingsley, Jr.

STATE OF MISSISSIPPI
COUNTY OF HINDS

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 2nd day of May, 1988.

(SEAL)



Notary Public

My commission expires:

My Commission Exp. Date: 01, 1991

A. SUBJECT

1. NLS 86/15 Implementation of Generic Letter 88-06: Revision to Technical Specifications Section 6.0.
2. Affected Technical Specifications:
 - a. Index - Page xix
 - b. Offsite, Administrative Controls Subsection 6.2.1 - Page 6-1
 - c. Unit Staff, Administrative Controls Subsection 6.2.2 - Pages 6-1 and 6-2
 - d. Offsite Organization, Figure 6.2.1-1 - Page 6-3
 - e. Unit Organization, Figure 6.2.2-1 - Page 6-4.

B. DISCUSSION

1. The proposed change replaces the organization charts currently in the Technical Specifications with more general organizational requirements. Most aspects of the organization charts are already required by regulation, other Technical Specifications or the Updated Final Safety Analysis Report (UFSAR). The general requirements provided to replace the organization charts capture the essence of those organizational features depicted on the charts that are not covered by other specifications and are important to the NRC for ensuring the plant will be operated safely.
2. In Generic Letter (GL) 88-06, the staff determined that with appropriate changes to the administrative requirements, the onsite and offsite organization charts may be removed from the Technical Specifications. The staff also found that the above change will not reduce plant safety and it is generically applicable to all power reactors. The staff concluded that removal of the organization charts from Technical Specifications will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure, consistent with the Commission policy on Technical Specification improvement. The staff encouraged licensees to propose Technical Specification changes that are consistent with the guidance provided in GL 88-06.
3. Consistent with the NRC guidance provided in GL 88-06 the following changes are proposed:
 - a. The index is modified to indicate the revised Technical Specification subsection title headings.
 - b. Subsection 6.2.1 is revised to be applicable for both offsite and onsite organizations. The reference to Figure 6.2.1-1 is deleted and replaced with more general organizational requirements which capture the essential aspects of the organizational structure that are defined by the existing onsite and offsite organization charts.

- c. The reference to Figure 6.2.2-1 is deleted in Subsection 6.2.2. In addition, a statement is added designating those positions in the onsite organization that require a Senior Reactor Operator (SRO) license.
 - d. Figure 6.2.1-1 is deleted.
 - e. Figure 6.2.2-1 is deleted.
4. Attached to this proposed Technical Specification change are the affected Technical Specification pages.

C. JUSTIFICATION

- 1. The content required in the Administrative Controls Section of the Technical Specifications is specified in 10CFR50.36.c(5). The regulation requires that the Technical Specifications contain the controls and provisions that are necessary to assure operation of the facility in a safe manner and does not specifically require inclusion of organizational charts in the Technical Specifications.
- 2. Currently, organization changes result in System Energy Resources, Incorporated's (SERI) processing and the NRC's review of unnecessary license amendments. The benefit of this proposed change is that it would permit SERI to implement changes to the structure of the offsite or onsite organizations without first having to obtain NRC approval through the issuance of a license amendment to update organization charts in the Technical Specifications. Replacement of the organization charts with more general organizational requirements will eliminate this needless expenditure of resources for both organizations.
- 3. As stated in GL 88-06, it has been the NRC's experience that organization charts by themselves have been of little help in ensuring that the objectives of administrative control requirements are met. Specific operational requirements are required elsewhere in the Technical Specifications that bear more directly on operational safety than organization charts. The staff summarized that many of the details shown on the onsite and offsite organization charts are not essential to the safe operation of the facility.
- 4. The staff's guidance issued in GL 88-06 stated that the only aspects of organization charts which are important to safety, not covered by other specifications, and must remain in Technical Specifications are those listed below:
 - (a) A requirement that lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those 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.

- (b) 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.
- (c) 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.
- (d) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license.
- (e) 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.

SERI is adding the above information to Technical Specification Subsections 6.2.1 and 6.2.2 to replace those aspects important to safety contained in the organization charts (Figure 6.2.1-1 and 6.2.2-1) which are being deleted. The staff concluded in GL 88-06 that since the above conditions will be maintained in the Technical Specifications, removal of the organization charts represents no reduction in current safety requirements.

- 5. SERI has ensured that the organizational information described in (a) above is incorporated in the UFSAR and is referenced in the proposed Technical Specification change. The current Grand Gulf Nuclear Station UFSAR contains the organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions as specified by 10CFR50.34(b)(6)(i). As required by 10CFR50.71(e), SERI submits annual updates to the UFSAR. Therefore, the NRC will continue to be informed of organizational changes without having the organization charts in the Technical Specifications.
- 6. Figure 6.2.2-1 currently specifies that certain positions require an SRO license. These qualification requirements are not designated elsewhere in the Technical Specifications outside of the organization chart in Figure 6.2.2-1. For this reason, a statement is being added to Technical Specification 6.2.2 specifying the positions which require an SRO license that were designated in Figure 6.2.2-1. Table 6.2.2-1 will remain to indicate the minimum shift crew composition and the number of personnel required to have an RO license on shift. Positions which require having been an SRO or having been certified on a plant of this type are currently indicated in UFSAR Figure 13.1-2 and will remain as such. Therefore, no position qualifications will be lost when Figure 6.2.2-1 is deleted.

7. The Technical Specifications have been examined for additional references to the organization charts and none were found other than those in the attached affected Technical Specification pages.
8. The guidance provided in GL 88-06 has been used to prepare this proposed Technical Specification amendment request. The proposed changes do not differ from the GL 88-06 guidance other than in the titles and names of various positions.

D. SIGNIFICANT HAZARDS CONSIDERATION

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because replacement of the organization charts with more general organizational requirements in the Technical Specifications is administrative in nature. No physical alterations of plant configuration or changes to setpoints or operating parameters are proposed. These changes do not alter SERI's commitment to maintain a management structure that contributes to the safe operation and maintenance of the plant. As in the past, the NRC will continue to be informed of organizational changes through other required controls. 10CFR50.34(b)(6)(i) requires that the applicants' organizational structure be included in the UFSAR. Chapter 13 of the UFSAR provides a description of the organization and detailed organization charts. As required by 10CFR50.71(e), SERI submits annual updates to the UFSAR.
2. The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed change is administrative in nature, and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.
3. The proposed amendment does not involve a significant reduction in a margin of safety. Since the proposed amendment retains those aspects of the organizational charts which are important to safety, removal of the organization charts represents no reduction in the current margin of safety.

Based on the above reasoning, SERI has determined that the proposed amendment does not involve a significant hazards consideration.