



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 99 AND 86 TO
FACILITY OPERATING LICENSE NO. NPF-4 AND NPF-7
VIRGINIA ELECTRIC AND POWER COMPANY
OLD DOMINION ELECTRIC COOPERATIVE
NORTH ANNA POWER STATION, UNITS NO. 1 AND NO. 2
DOCKET NOS. 50-338 AND 50-339

INTRODUCTION

By letter dated March 17, 1988, the Virginia Electric and Power Company (the licensee) proposed changes to the Technical Specifications (TS), Section 6, Administrative Controls, for the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2). The proposed changes were necessitated by a major reorganization of the licensee announced on March 8, 1988, to become effective in April 1988. Specifically, nuclear operations will be strengthened by bringing the Engineering and Power Operations Departments within a single organization headed by a Senior Vice President. Nuclear Site Services and Nuclear Training will be included in the Nuclear Operations Department. A single group will be created within the Engineering Department responsible for nuclear transient and fuel analysis. Also, within the Engineering Department, Inservice Inspection and Non-Destructive Examination services will be combined under a single manager. In addition, the number of system engineers assigned to NA-1&2 will be increased.

The proposed changes provided in the licensee's submittal of March 17, 1988 would remove Figure 6.2-1, Offsite Organization, and Figure 6.2-2, Unit Organization, and replace the figures with a narrative description of the offsite and onsite organizations functional requirements in TS 6.2.1. Additionally, the licensee would replace certain corporate level position titles with more general position descriptions and revise certain administrative requirements in order to bring them into closer conformance with the corresponding requirements in the currently acceptable Standard TS for Westinghouse facilities.

After the licensee's submittal of March 17, 1988, NRC Generic Letter 88-06 was issued on March 22, 1988 which addressed the removal of organization charts from TS administrative control requirements. Since the licensee did not have the specific guidance of Generic Letter 88-06 prior to their submittal on March 17, 1988, the staff and the licensee discussed these matters in order to achieve conformance between their submittal and the provisions of Generic Letter 88-06. Our discussion and evaluation of these matters is provided below.

DISCUSSION

Consistent with the guidance provided in the Standard TS, 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. In its review of these matters, 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 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 that were essential for conformance with regulatory requirements were specified in Generic Letter 88-06, TS 6.2.1.

The licensee's changes to the NA-1&2 TS are in accordance with the guidance provided in Generic Letter 88-06. Additionally, in certain cases, the licensee's changes are more restrictive than Generic Letter 88-06. Finally, certain requirements in Section 6 of the TS are being revised to bring the NA-1&2 TS more closely in conformance with the currently acceptable Standard TS for Westinghouse facilities. The changes are addressed in detail below.

- (1) Specifications 6.2.1 and 6.2.2 would be revised to delete the references to Figures 6.2-1 and 6.2-2, which would be removed from the NA-1&2.
- (2) Functional requirements of the offsite and onsite organization would be defined and added to the NA-1&2 TS 6.2.1 for Items a., b. and c., as specified in Generic Letter 88-06. For Item d. (as defined in Generic Letter 88-06), the licensee would provide a more restrictive definition as specified in the licensee's proposed Items d. and e. The proposed NA-1&2 TS notes that implementation of the requirements would be documented in the NA-1&2 Updated Final Safety Analysis Report (UFSAR).
- (3) The senior reactor operator and reactor operator license qualified positions, identified on the NA-1&2 organization charts for the unit staff, are noted as being required in the NA-1&2 TS 6.3.1 and Table 6.2.1. Therefore, this requirement will be retained as a requirement following removal of the organization charts from the NA-1&2 TS.

- (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 will be addressed in the next annual update of the NA-1&2 Updated Final Safety Analysis Report (UFSAR) chapter entitled "Conduct of Operations," which contains the detailed organizational structure and description of the conduct of operations. This information is also required by 10 CFR 50.71(e) to be maintained and updated annually.
- (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.
- (6) The licensee has replaced certain corporate level position titles except those required by Generic Letter 88-06 (the Senior Vice President-Nuclear and Station Manager) with more general position descriptions. These general position descriptions are: (a) management position responsible for training of the operating staff; (b) management position responsible for the quality assurance functions; (c) management position responsible for health physics; (d) offsite management position responsible for independent/operational event review; (e) management position responsible for the quality assurance audit program; and (f) the departmental name "Safety Evaluation and Control (SEC)" has been replaced by "Independent/Operational Event Review Group." These changes are consistent with the general guidelines for Generic Letter 88-06. In the March 17, 1988 application, the licensee initially proposed to identify the management officers by general terminology. However, after discussions with the NRC staff, the licensee modified the request to identify the Senior Vice President-Nuclear and the Station Manager by their titles in accordance with the recommendations of GL 88-06. This change merely adds clarity to the more general terminology used in the March 17, 1988 request and does not affect the substance of the amendments as noticed nor the staff's proposed no significant hazards consideration determination.
- (7) TS 6.5.2.9, 6.5.2.10 and 6.5.3.3 requirements have been revised to conform more closely with the corresponding requirements in the most current version of the Standard TS for Westinghouse plants. Accordingly, the intent of the original requirement remains unchanged. The following is a summary of these changes.
 - a. TS 6.5.2.9 "Authority" for the Independent/Operational Event Review Group.

The existing requirement specifies the chain of command as well as the authority responsibilities by stating that the Director-Safety Evaluation and Control shall report to and advise the Manager-Nuclear Programs and Licensing, who shall advise the Vice President-Nuclear Operations on those areas of responsibility specified in the "Review" section. The proposed

change eliminates the description of the chain of command but still requires that the offsite management position responsible for IOER shall report through the established organization structure and advise the Vice President-Nuclear on any safety concerns discovered during the independent review of those areas of responsibility specified in the "Review" section. The corresponding specification in the Standard TS similarly requires that the independent review group report to and advise the Vice President-Operations on those areas of responsibility specified in the "Review" section of the TS.

b. TS 6.5.2.10 "Records" for the Independent/Operational Event Review Group.

The existing requirement specifies that records of SEC activities delineated in the "Review" section be prepared, maintained in files, and a summary disseminated to a specified list of individuals each calendar month. The proposed change eliminates the list of individuals but still requires that a summary be disseminated to the Vice President-Nuclear, the corporate management position responsible for the quality assurance, audit program and other appropriate management personnel each calendar month. The corresponding specification in the Standard TS similarly requires that the independent review group's records of reviews encompassed in the "Review" section of the Standard TS be prepared, approved, and forwarded to the Vice President-Operations within 14 days following completion of the review. Although the time requirements for the distribution of records differs between the proposed change and the Standard TS (each calendar month versus 14 days after the review is completed), the intent of this specification is preserved since the appropriate records will be prepared and disseminated to the appropriate individuals in a timely manner.

c. TS 6.5.3.3 "Records" for the Quality Assurance Department.

The existing requirement specifies that records of the Quality Assurance Department audits be prepared, maintained in files, and disseminated to a specified list of individuals, as well as the supervisor(s) of the area(s) audited. The proposed change eliminates the list of individuals but still requires that the audit reports be disseminated to the Vice President-Nuclear and the management position responsible for the areas audited. The corresponding specification in the Standard TS similarly requires that audit reports encompassed by the "Audit" section of the Standard TS be prepared, approved, and distributed to the Vice President-Nuclear and the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization. Although neither the existing NA-1&2 TS nor the proposed change requires the distribution of audit reports within 30 days after the audit, this requirement is specified in the QA Department administrative procedure. Therefore, the intent of this requirement is preserved in that audit reports will be distributed to the appropriate individuals in a timely manner.

EVALUATION

On the basis of our 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 and more closely with the most current version of the Standard TS for Westinghouse facilities which appropriately applies to NA-1&2. Accordingly, the staff find these changes to be acceptable.

ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that these amendments involve no significant hazards considerations and there has been no public comment on such finding. 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 the amendments.

CONCLUSION

We have 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Date: April 28, 1988

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