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Georgia Power

the southern electric system

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May 6, 1988

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
CORPORATE AND ONSITE ORGANIZATION

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes changes to the Plant Hatch Units 1 and 2 Technical Specifications (TS) and Environmental Technical Specifications (ETS), Appendices A and B, respectively, to Operating Licenses DPR-57 and NPF-5.

The proposed amendment replaces the organization charts in the Technical Specifications with more general organizational requirements. These general requirements capture the essential organizational features depicted on the charts necessary for ensuring that the plant is operated safely. This change is consistent with the guidance provided in Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements", issued on March 22, 1988.

Enclosure 1 provides detailed descriptions of these proposed changes and circumstances necessitating the change request.

Enclosure 2 details the bases for our determination that the proposed changes do not involve significant hazards considerations.

Enclosure 3 provides page change instructions for incorporating the proposed changes. The proposed changed TS and ETS pages for Unit 1 and Unit 2 follow Enclosure 3.

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Page Two

Payment of the filing fee in the amount of one hundred fifty dollars is enclosed.

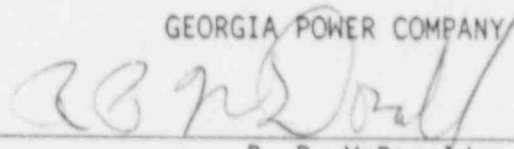
In order to allow time for procedure revisions and orderly incorporation into copies of TS, we request that the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendment.

In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources.

Mr. R. P. McDonald states that he is an Executive Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

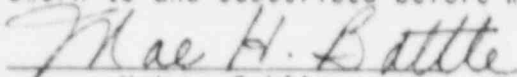
GEORGIA POWER COMPANY

By: _____



R. P. McDonald

Sworn to and subscribed before me this 6th day of May 1988.



Notary Public

Notary Public, Fulton County, Ga.
My Commission Expires Nov. 2, 1991

GPD/lc

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Page Change Instructions
4. Filing Fee - \$150.00

c: (see next page)

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Page Three

c: Georgia Power Company

Mr. J. T. Beckham, Jr., Vice President - Plant Hatch
GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Dr. J. N. Grace, Regional Administrator
Mr. P. Holmes-Ray, Senior Resident Inspector - Hatch

State of Georgia

Mr. J. L. Ledbetter, Commissioner - Department of Natural Resources

ENCLOSURE 1

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
CORPORATE AND ONSITE ORGANIZATION
BASIS FOR CHANGE REQUEST

Proposed Change 1:

In the TS submittal of October 27, 1986 (Reference 1) Georgia Power Company (GPC) proposed changes to the administrative controls in the TS and ETS to reflect changes to the company organization. In addition to these organization changes, GPC proposed that TS figures depicting onsite and corporate organization be deleted since they also appear in Section 13 of the Plant Hatch Unit 2 Updated Final Safety Analysis Report (FSAR). The Nuclear Regulatory Commission (NRC) safety evaluation addressing these changes (Reference 2) approved the proposed organization changes, however, it did not approve the deletion of the TS organization charts. The staff stated that they were generically examining the requirement for organization charts in TS, and that until a generic decision is reached, the figures must remain in the TS and the ETS. Since that time, the NRC has issued a generic letter (Reference 3) that allows for the deletion of TS organization charts. The letter states that with certain additions, the administrative TS would capture those organizational features necessary to assure safe plant operation without the need to maintain the organization charts. The addition to Section 6.2.0 of the TS proposed by GPC is consistent with the guidance provided in the generic letter. On this basis, it is proposed that the onsite and corporate organization charts be deleted from the Units 1 and 2 TS and ETS. Specifically, Units 1 and 2 TS Figures 6.2.1-1 and 6.2.2-1 and ETS Figure 5.2-1 will be deleted.

BASIS

Inclusion of organization charts in the Technical Specifications is not specifically required by regulation. The presence of these charts requires GPC's processing and the NRC's review of unnecessary license amendments for organization changes. Consistent with NRC and industry commitment to improve Technical Specifications, GPC proposes to replace

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ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
CORPORATE AND ONSITE ORGANIZATION
BASIS FOR CHANGE REQUEST

the organization charts with more general organizational requirements. The proposed change would eliminate a needless expenditure of resources by both GPC and the NRC. Replacement of organization charts with more general requirements was recently endorsed by the NRC in Generic Letter 88-06. The change proposed by GPC is consistent with the guidance provided in the Generic Letter.

PROPOSED CHANGE 2

Change references to the Senior Vice President-Nuclear Operations to the "vice president" in Specifications 6.5.1.6.e, 6.5.1.7.c, 6.5.1.8, 6.5.2.2, 6.5.2.3, 6.5.2.8.g, 6.5.2.9, 6.5.2.10.a, 6.5.2.10.b, 6.5.2.10.c, 6.6.1.b, 6.7.1.b and 6.7.1.d. Change references to the Vice President - Plant Hatch to the "general manager" in Specifications 6.1.0, 6.5.1.6.e, 6.5.1.7.c, 6.5.1.8, 6.6.1.b, 6.7.1.b and 6.7.1.d. Change references to the Senior Executive Vice President to the "vice president" in ETS Section 5.0.

BASIS

Consistent with the replacement of the organization charts with more general requirements, GPC proposes to incorporate more general references to the vice president and general manager positions. These revisions would reduce the need for license amendments to reflect title changes while still maintaining the same level of management oversight to activities affecting safety.

REFERENCES:

1. Letter, J. P. O'Reilly (GPC) to D. Muller (NRC), "Edwin I. Hatch Nuclear Plant Units 1, 2 - Proposed changes to Technical Specifications Regarding Corporate and Onsite Organization", October 27, 1986.
2. Letter, L. P. Crocker (NRC) to J. P. O'Reilly (GPC), "Issuance of Amendment Nos. 145 and 80 to Facility Operating Licenses DFR-57 and NPF-5 - Edwin I. Hatch Nuclear Plant, Units 1 and 2", August 10, 1987.
3. NRC Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements", issued March 22, 1988.

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
CORPORATE AND ONSITE ORGANIZATION
10 CFR 50.92 EVALUATION

Proposed Change 1:

This proposed change would delete the corporate and onsite organization charts (Units 1 and 2 TS Figures 6.2.1-1 and 6.2.2-1 respectively) and the organization structure related to environmental activities (Units 1 and 2 ETS Figure 5.2-1).

BACKGROUND

The content required in the Administrative Controls section of the Technical Specifications is described in 10 CFR 50.36.c(5). This regulation requires that the Technical Specifications contain the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. Organization charts are not specifically required, but have generally been included in Technical Specifications as a means of depicting the organizational and management relationships necessary to support safe plant operation. As stated in Generic Letter 88-06, the NRC staff has found the organization charts to be of little value in ensuring that the objectives of the Administrative Controls are satisfied. Other Technical Specifications contain specific operational requirements which bear more directly on operational safety. At Plant Hatch, for example, Administrative Technical Specifications establish the following controls:

1. the authority of the plant general manager for overall plant operation,
2. the control room command authority of the On-Shift Operations Supervisor,
3. control room shift staffing and operator licensing in accordance with 10 CFR 50.54,
4. review and audit by the Plant Review Board and Safety Review Board, and
5. procedure, recordkeeping, and reporting requirements.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
CORPORATE AND ONSITE ORGANIZATION
10 CFR 50.92 EVALUATION

The staff determined that, with certain additions, the Administrative Technical Specifications would capture those organizational features necessary to assure safe plant operation without the need to maintain the organization charts. Consistent with the guidance provided in the Generic Letter, GPC is proposing to replace the organization charts with the following provisions:

ONSITE AND OFFSITE ORGANIZATION

6.2.0: Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These 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. These requirements shall be documented in the FSAR.
- b. The general manager shall be responsible for overall plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The vice president shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS
10 CFR 50.92 EVALUATION

- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

With these additions, the Administrative Technical Specifications would continue to meet the objectives of 10 CFR 50.36.c(5) without the need for organization charts. Detailed descriptions of the onsite and offsite organizations, including organization charts, are presently contained in the Hatch FSAR. This information will be updated regularly in accordance with 10 CFR 50.71(e). The organization charts in the FSAR will be maintained with at least the same level of detail as the charts proposed for removal from the Technical Specifications. Positions requiring a senior reactor operator or reactor operator license are designated in Technical Specification 6.2.2.h, and hence, do not need to be added.

In summary, the Administrative Technical Specifications, as amended, would assure that the organizational features essential to safe plant operation are maintained without the need for prior NRC approval of changes to organization charts.

ANALYSIS

GPC has reviewed the proposed change with respect to the requirements of 10 CFR 50.92 and has determined that the change does not involve significant hazards considerations. In support of this conclusion, the following analysis is provided:

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. The change is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. The change does not affect operation, maintenance, or testing of the plant. For these reasons, the response of the plant to previously evaluated accidents will remain unchanged.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS
10 CFR 50.92 EVALUATION

2. The proposed change does not create the possibility of a new or different kind of accident than any accident previously evaluated. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. A new or different kind of accident could therefore not result.

3. The proposed change does not significantly reduce a margin of safety. The general organizational requirements being added to the Technical Specifications will assure that those organizational features necessary for safe plant operation will continue to be maintained. Details of the organizational structure will be maintained in the FSAR and updated regularly. Deletion of the organization charts from the Technical Specifications will eliminate the unnecessary expenditure of GPC resources currently required to process license amendment requests for organization changes. Margins of safety are therefore not reduced.

CONCLUSION

Based on the preceding analysis, GPC has determined that the proposed change to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. GPC therefore concludes that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve significant hazards considerations.

PROPOSED CHANGE 2

Change references to the Senior Vice President-Nuclear Operations to the "vice president" in Specifications 6.5.1.6.e, 6.5.1.7.c, 6.5.1.8, 6.5.2.2, 6.5.2.3, 6.5.2.8.g, 6.5.2.9, 6.5.2.10.a, 6.5.2.10.b, 6.5.2.10.c, 6.6.1.b, 6.7.1.b and 6.7.1.d. Change references to the Vice President - Plant Hatch to the "general manager" in Specifications 6.1.0, 6.5.1.6.e, 6.5.1.7.c, 6.5.1.8, 6.6.1.b, 6.7.1.b and 6.7.1.d. Change references to the Senior Executive Vice President to the "vice president" in ETS Section 5.0.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS
10 CFR 50.92 EVALUATIONBACKGROUND

The Administrative Technical Specifications currently contain numerous references to the Senior Vice President - Nuclear Operations, and the Vice President - Plant Hatch. These references assure that an appropriate level of management control is exercised over activities affecting operational safety. A change to either of these titles requires a license amendment; however, as in the case of the organization charts, these specific titles could be replaced with more general references and the objectives of the Administrative Technical Specifications would continue to be met. Changing the above references to "vice president" and "general manager" would assure the same level of management control while eliminating the need for unnecessary license amendments when title changes occur. For the same reason, Section 5.0 of the ETS has been changed to indicate that the "vice president", rather than the Senior Executive Vice President, assumes corporate responsibility for implementation of the ETS.

ANALYSIS

GPC has reviewed the above proposed change and has determined that the change does not involve significant hazards considerations. In support of this conclusion, the following analysis is provided:

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. The change is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. Since the change has no direct bearing on operation, maintenance, or testing of the plant, the response of the plant to previously evaluated accidents will not be affected.
2. The proposed change does not create the possibility of a new or different kind of accident than any accident previously evaluated. Since no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. A new or different kind of accident could therefore not result.
3. The proposed change does not significantly reduce a margin of safety. The previous level of management oversight will be maintained over activities affecting nuclear safety.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS
10 CFR 50.92 EVALUATION

CONCLUSION

Based on the preceding analysis, GPC has determined that the proposed change to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or significantly reduce a margin of safety. GPC therefore concludes that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve significant hazards considerations.

ENCLOSURE 3

PLANT HATCH - UNITS 1, 2
 NRC DOCKETS 50-321, 50-366
 OPERATING LICENSES DPR-57, NPF-5
 REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
 CORPORATE AND ONSITE ORGANIZATION
PAGE CHANGE INSTRUCTIONS

The proposed changes to the Technical Specifications and Environmental Technical Specifications (Appendices A and B, respectively, to Operating Licenses DPR-57 and NPF-5) would be incorporated as follows:

UNIT 1

<u>Remove Page</u>	<u>Insert Page</u>
6-1	6-1
6-1a	-
6-2	6-2
6-3	6-3
6-7	6-7
6-8	6-8
6-9	6-9
6-11	6-11
6-12	6-12
6-13	6-13
5-1 (ETS)	5-1
5-10 (ETS)	-

UNIT 2

<u>Remove Page</u>	<u>Insert Page</u>
6-1	6-1
6-1a	-
6-2	6-2
6-3	6-3
6-6	6-6
6-7	6-7
6-8	6-8
6-10	6-10
6-11	6-11
6-12	6-12
5-1 (ETS)	5-1
5-10 (ETS)	-