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W3P88-0096  
A4.05  
QA

May 20, 1988

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

Subject: Waterford SES Unit 3  
Docket No. 50-382  
Technical Specification Change Request NPF-38-80

- References: 1) Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements," dated 03/22/88
- 2) LP&L Letter W3P87-2566 from J.G. Dewease to USNRC dated 12/23/87

Gentlemen:

Louisiana Power & Light hereby files an application for an amendment to the Waterford 3 Technical Specifications. The proposed change, which is based on the guidance provided in Generic Letter 88-06 (Reference 1), will remove Figures 6.2-1 and 6.2-2 (organizational charts) from the Administrative Controls Section of the Technical Specifications and replace them with general administrative control requirements that were inherently defined by the existing charts. As requested by your staff, this change will supersede Technical Specification Change Request NPF-38-71, Reference 2, which was submitted in December, 1987 to revise the aforementioned Figures. We understand that since the proposed change conforms to the guidance provided in Generic Letter 88-06 it will be reviewed and approved in a timely manner.

The proposed change does not involve an unreviewed safety question nor a significant hazards consideration. Should you have any questions or require additional information please contact Larry Laughlin at (504) 464-3499.

Yours very truly,

*Soz* J.G. Dewease  
Senior Vice President -  
Nuclear Operations

JGD:TJG:ssf

Enclosure: NPF-38-80

cc: R.D. Martin, J.A. Calvo, D.L. Wigginton, NRC Resident Inspectors  
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DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-38-80

This is a request to delete the organization charts (Figures 6.2-1 and 6.2-2) from the Waterford 3 Technical Specifications in accordance with Generic Letter 88-06.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Description

Generic Letter 88-06 provides guidance for the submittal of Technical Specification (TS) change requests to remove the organization charts from the administrative control requirements of TS. In accordance with this guidance, the proposed change would delete TS Figures 6.2-1 and 6.2-2 and implement certain associated changes consistent with Generic Letter 88-06.

As discussed in Generic Letter 88-06, the NRC staff examined the regulatory requirements for administrative control in TS provided in 10CFR50.36. This regulation states that administrative controls are the provisions relating to organization and management necessary to ensure operation of the facility in a safe manner. It has been the staff'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 TS that bear more directly on operational safety than organization charts. Many of the details shown on the onsite and offsite organization charts are not essential to the safe operation of the facility. Over the years, the staff experience with changes in the details of operating organizations has shown that organization charts can be modified in many ways while maintaining adequate operational safety. This experience has enabled the staff to distill those organizational characteristics which are important to safety. The staff has found that the only aspects of organization charts which are important to safety, are not covered by other specifications, and must remain in TS are those conditions listed below. Accompanying each condition is a description of the means proposed for Waterford 3 to satisfy the condition.

- (1) 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.

The proposed change includes a new paragraph 6.2.1a which codifies this requirement. Documentation of the necessary organizational information is contained in the Waterford 3 FSAR Chapter 13 and will be maintained current in accordance with 10CFR50.71(e).

- (2) 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.

The Senior Vice President - Nuclear Operations is designated in proposed paragraph 6.2.1b as having corporate responsibility for overall plant safety.

- (3) 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.

In proposed paragraph 6.2.1c the Plant Manager is designated as responsible for overall unit operation.

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

TS Figure 6.2-2 presently designates the position of Operations Superintendent as requiring an SRO license. Following deletion of Figure 6.2-2, paragraph 6.2.2g has been proposed to maintain this requirement.

- (5) Provisions of sufficient organizational freedom to be independent of operational pressure to those individuals who perform the functions of health physics, quality assurance, and training of the operating staff.

Proposed paragraph 6.2.1d has been included to ensure sufficient organizational freedom from operational pressures in performing training, health physics and quality assurance functions.

### Safety Analysis

In Generic Letter 88-06 the NRC staff has defined the conditions under which organization charts may be removed from the TS without reducing plant safety. The proposed changes delete the organization charts (Figures 6.2-1 and 6.2-2) while adding the general administrative control requirements necessary to satisfy the conditions of Generic Letter 88-06. Therefore, removal of the organization charts from the Waterford 3 TS represents no reduction in current safety requirements.

### Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.92(c); (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT A