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the southern electric system

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June 1, 1988

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

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
AMENDED REQUEST TO REVISE TECHNICAL SPECIFICATIONS
CORPORATE AND PLANT ORGANIZATIONS

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 to amend the Vogtle Electric Generating Plant Unit 1 Technical Specifications, Appendix A to Operating License NPF-68. This submittal revises GPC's amendment request dated May 6, 1988 (SL-4290) in order to clarify certain position titles.

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. GPC also proposes to revise or delete references to certain corporate management positions to remove unnecessary details from the Technical Specifications.

Enclosure 1 provides a detailed description of the proposed change and the basis for the change request.

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

Enclosure 3 provides instructions for incorporating the proposed changes into the Technical Specifications. The proposed revised pages follow Enclosure 3.

Payment of the required filing fee was made with the May 6, 1988, submittal.

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

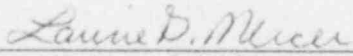
Mr. R. P. McDonald states that he is an Executive Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

GEORGIA POWER COMPANY

By: 

R. P. McDonald

Sworn to and subscribed before me this 1st day of June 1988.


Notary Public

WEB/1m Notary Public, Clayton County, Ga.
My Commission Expires Oct. 15, 1991

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation

c: Georgia Power Company
Mr. P. D. Rice
Mr. G. Bockhold, Jr.
GO-NORMS

U. S. Nuclear Regulatory Commission
Dr. J. N. Grace, Regional Administrator
Mr. J. B. Hopkins, Licensing Project Manager, NRR (2 copies)
Mr. J. F. Rogge, Senior Resident Inspector-Operations, Vogtle

ENCLOSURE 1

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
BASIS FOR PROPOSED CHANGE

PROPOSED CHANGE 1

Delete Figures 6.2-1 and 6.2-2 of the Technical Specifications. Revise Specification 6.2.1 to provide more general requirements for the off-site and plant organizations.

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 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-Nuclear" in Specifications 6.2.3, 6.4.1, 6.4.2, 6.5.1, and 6.6.1. Change references to the General Manager - Vogtle Nuclear Operations to the "General Manager-Nuclear Plant" in specifications 6.1.1, 6.1.2, 6.2.2, 6.4.1, 6.6.1, 6.7.1, 6.7.3, 6.12, 6.13, and 6.14. Delete references to the Manager-Nuclear Performance and Analysis in Specification 6.2.3.

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, and to delete references to the Manager-Nuclear Performance and Analysis. 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.

ENCLOSURE 2

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
10 CFR 50.92 EVALUATION

In accordance with 10 CFR 50.92, Georgia Power Company has evaluated the attached proposed amendment to the VEGP Unit 1 Technical Specifications and has determined that operation of the facility in accordance with the proposed amendment would not involve significant hazards considerations. The basis for this determination is as follows:

PROPOSED CHANGE 1

Delete Figures 6.2-1 and 6.2-2 of the Technical Specifications. Revise Specification 6.2.1 to provide more general requirements for the off-site and plant organizations.

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 Vogtle, 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,

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS
10 CFR 50.92 EVALUATION

4. review and audit by the Plant Review Board, Safety Review Board, and Independent Safety Engineering Group, and
5. procedure, recordkeeping, and reporting requirements.

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

6.2.1 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-Nuclear Plant 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-Nuclear 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 Vogtle FSAR. This information will be updated regularly in accordance with 10 CFR 50.71(e). The organization charts in the FSAR will be upgraded as necessary and 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 license are designated in Technical Specification 6.2.2 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-Nuclear" in Specifications 6.2.3, 6.4.1, 6.4.2, 6.5.1, and 6.6.1. Change references to the General Manager-Vogtle Nuclear Operations to the "General Manager-Nuclear Plant" in specifications 6.1.1, 6.1.2, 6.2.2, 6.4.1, 6.6.1, 6.7.1, 6.7.3, 6.12, 6.13, and 6.14. Delete references to the Manager-Nuclear Performance and Analysis in Specification 6.2.3.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS
TO CFR 50.92 EVALUATIONBACKGROUND

The Administrative Technical Specifications currently contain numerous references to the Senior Vice President-Nuclear Operations, and the General Manager-Vogtle Nuclear Operations. 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-Nuclear" and "General Manager-Nuclear Plant" would assure the same level of management control while eliminating the need for unnecessary license amendments when title changes occur. Reference is made to the Manager-Nuclear Performance and Analysis with respect to reporting requirements of the Independent Safety Engineering Group (ISEG). Specification 6.2.3 requires that ISEG recommendations and reports be forwarded to the Senior Vice President-Nuclear Operations through the Manager-Nuclear Performance and Analysis. Since this information is required to be sent to the "Vice President-Nuclear" level, an appropriate level of management attention is assured. Specification of the intermediate reporting level represents an unnecessary degree of detail. GPC therefore proposes to delete reference to the Manager-Nuclear Performance and Analysis.

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 to the plant to previously evaluated accidents will not be affected.

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 previous level of management oversight will be maintained over activities affecting nuclear safety. Deletion of references to the Manager-Nuclear Performance and Analysis merely removes unnecessary details from the Technical Specifications. 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 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.