



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 122
TO FACILITY OPERATING LICENSE NO. DPR-35
BOSTON EDISON COMPANY
PILGRIM NUCLEAR POWER STATION
DOCKET NO. 50-293

1.0 INTRODUCTION

The NRC staff noted in the Systematic Assessment of License Performance (SALP) Board Report No. 50-293/87-99 for the Pilgrim Nuclear Power Station (PNPS) which covered the period of February 1, 1987 through May 15, 1988, that an organizational transition had taken place. The report also noted that several temporary changes, including numerous changes in personnel, had been made to strengthen planning, control and performance at the PNPS. Many of these temporary changes were incorporated into a permanent reorganization in February 1988. The licensee continued to refine the new organization and control process through July 1988. The licensee notified the NRC of the reorganization by letter dated January 7, 1988 and subsequently requested an amendment to reflect the new organization in a letter dated August 6, 1988.

The notification and request were in accordance with the PNPS Technical Specifications (TS), Section 6.2.C, "Changes to the Organization," which allows organizational changes to be implemented without prior NRC approval provided notification is made and a subsequent license amendment request is submitted for NRC review and approval.

2.0 DISCUSSION

The requested changes include TS Figures 6.2-1 and 6.2-2 which are revised to conform with the current nuclear organization at PNPS. These changes include the replacement of the Vice President - Nuclear Operations and Nuclear Operations Manager positions with a Station Director who holds overall responsibility for the safe operation of the facility, as stated in TS 6.1. The Operations Review Committee (ORC) reports to the new Station Director and the Quality Assurance and Emergency Preparedness Departments report directly to the Senior Vice President - Nuclear. In addition, the responsibilities of the departments reporting to the Station Director and the Vice President - Nuclear Engineering are restructured.

The ORC composition in Technical Specification 6.5.A.2 is revised to allow the Station Director to appoint in writing the ORC membership from appropriate plant disciplines, instead of listing the membership in Technical Specifications. The Pilgrim Station Organization in Technical Specification Figure 6.2-2 is revised accordingly to remove references to specific ORC members.

The management titles throughout Technical Specification 6.0 are revised to adopt those currently in use in the nuclear organization.

The reporting requirements given in Specifications 6.5.A.6.i and 6.5.A.7.c for Technical Specification violations and ORC disagreements, respectively, are changed from the obsolete positions, Nuclear Operations Manager and Vice President - Nuclear Operations, to the Station Director and the Senior Vice President - Nuclear.

The authority for the approval of procedures in Specification 6.8 is changed from the obsolete position, Nuclear Operations Manager, to the "responsible department manager."

Several editorial changes are made to correct the Table of Contents page numbers, correct punctuation, add appropriate page headers, spell out the acronym "NSRAC," renumber the items listed under Specification 6.10.B, and correct the spelling of "preset" in Specification 6.13.1.b.

3.0 EVALUATION

An Integrated Assessment Team Inspection (IATI) was conducted at the PNPS during the period of August 8 through 24, 1988 and is documented in Inspection Report 50-293/88-21 dated September 7, 1988. The purpose of the inspection was to assess the facility's readiness for restart including the current organizational structure and management.

The IATI report concluded that the organizational structure provides for an appropriate distribution (span) of responsibilities and accountabilities for the activities being performed by the functional units within the organization. The depth (level) of managers in the functional areas should contribute to stability in the organization by providing for the development of technical and managerial skills within the functional areas and providing a framework for career growth.

The report also concluded that the redistribution of functional responsibilities and depth in management throughout the organization provides the framework necessary to enhance stability and support safe and reliable operation of the PNPS. This is reinforced by the evidence of management's effectiveness in creating a much improved nuclear safety ethic and bringing about improvements in the functional areas described in the subsequent sections of the report.

The resumes and position descriptions of key managers and selected personnel throughout the organization were audited during the inspection. The educational and experience backgrounds of the licensee's personnel were compared to the requirements of the positions held, as delineated in ANSI N18.1-1971, with a focus on the management experience of key personnel. No deficiencies were identified relating to the qualification requirements of the ANSI standard. More significantly, it should be noted that there has been an addition of talented management personnel with extensive and successful management experience.

The corporate policy relating to the Nuclear Organization contained in the Mission, Organization and Policy manual includes, among other goals, striving to achieve raising standards of performance, dedication to protecting the environment and public, and rigorous adherence to procedures. The IATI members, through observations, and interviews, noted a positive change in the attitude toward nuclear safety throughout the PNPS organization. This change was evident in the changing cultural attributes resulting in improved performance of safety-related activities. These improvements were acknowledged in the most recent SALP report previously discussed and have progressed further as discussed in the functional areas of the IATI report. The observations support management's effectiveness in communicating corporate goals and management's oversight in assuring that the goals are being supported and pursued.

The licensee has a variety of procedures to provide policy, control and coordination of the activities and actions of the organization. The procedures are, for the most part, current. They adequately identify corporate policy, organization, interfaces, functional requirements, responsibilities, accountabilities and qualifications necessary for the control of activities and coordination of actions within the organization.

The staff has determined that the proposed changes in the PNPS organization are acceptable; the PNPS organization is adequately staffed with qualified personnel; mechanisms are in place to enhance stability; and controls and programs are in place to support the organization. This conclusion is based on the details discussed above and supported by additional details in the IATI report. The revision to Section 3.5.A.2 to allow the Station Director to appoint in writing the ORC membership from the listed plant disciplines instead of listing the membership does not change the types of members but does allow changes of specific members. This change will reduce the number of administrative TS changes which would have been required while maintaining the representation by the appropriate disciplines, and therefore, is acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to recordkeeping, reporting or administrative procedures or requirements. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets 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 this amendment.

5.0 CONCLUSION

The staff has 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 this amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ACKNOWLEDGEMENT

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Dated: September 26, 1988