



OLIVER D. KINGSLEY, JR.
Vice President
Nuclear Operations

June 3, 1988

U. S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D. C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Implementation of GL 88-06: Revision
to Technical Specifications Section 6.0
Proposed Amendment to the Operating
License (PCOL-88/06 Revised)
AECM-88/0106

System Energy Resources, Inc. (SERI) submitted in AECM-88/0085, dated May 2, 1988, a proposed amendment to the Grand Gulf Operating License to implement the Technical Specification changes encouraged by Generic Letter 88-06. The proposed amendment would replace the organization charts in Technical Specifications Section 6.0 with more general organizational requirements. In response to an NRC letter dated May 19, 1988, attached is revised PCOL-88/06 which incorporates changes made to address the staff's request for additional information. The changes are indicated in the margins with a letter "R".

In accordance with the provisions of 10 CFR 50.4, the original of the requested amendment is enclosed and the appropriate copies will be distributed. The attachment provides the technical justification and discussion to support the requested amendment. This amendment has been reviewed and accepted by the Plant Safety Review Committee. The Safety Review Committee reviewed the requested amendment at the time of the original submittal.

Based on the guidelines presented in 10 CFR 50.92, SERI has concluded that this proposed amendment involves no significant hazards considerations.

SERI has determined an application fee of \$150 is not required since it was submitted previously with AECM-88/0085.

Yours truly,

8806140133 880603
PDR ADOCK 05000416
P ODK:bms

Attachments: 1. Affirmation per 10 CFR 50.30
2. GGNS PCOL-88/06

cc: (See Next Page)

J16AECM88051101 - 1

P. O. BOX 23070 | JACKSON, MISSISSIPPI 39225-3070 | (601) 984-9290
A Middle South Utilities Company

Accol
1/1

cc: Mr. T. H. Cloninger (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)
Mr. R. C. Butcher (w/a)

Dr. J. Nelson Grace, Regional Administrator (w/a)
U. S. Nuclear Regulatory Commission
Region II
101 Marietta St., N. W., Suite 2900
Atlanta, Georgia 30323

Mr. L. L. Kintner, Project Manager (w/a)
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop 14B20
Washington, D.C. 20555

Dr. Alton B. Cobb (w/a)
State Health Officer
State Board of Health
Box 1700
Jackson, Mississippi 39205

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

LICENSE NO. NPF-29

DOCKET NO. 50-416

IN THE MATTER OF
MISSISSIPPI POWER & LIGHT COMPANY
and
SYSTEM ENERGY RESOURCES, INC.
and
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

AFFIRMATION

I, O. D. Kingsley, Jr., being duly sworn, state that I am Vice President, Nuclear Operations of System Energy Resources, Inc.; that on behalf of System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by System Energy Resources, Inc. to sign and file with the Nuclear Regulatory Commission, this application for amendment of the Operating License of the Grand Gulf Nuclear Station; that I signed this application as Vice President, Nuclear Operations of System Energy Resources, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.



O. D. Kingsley, Jr.

STATE OF MISSISSIPPI
COUNTY OF HINDS

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 3rd day of June, 1988.

(SEAL)



Notary Public

My commission expires:

October 27, 1991

A. SUBJECT

1. NLS 86/15 Implementation of Generic Letter 88-06: Revision to Technical Specifications Section 6.0.
2. Affected Technical Specifications:
 - a. Index - Page xix
 - b. Offsite, Administrative Controls Subsection 6.2.1 - Page 6-1
 - c. Unit Staff, Administrative Controls Subsection 6.2.2 - Pages 6-1 and 6-2
 - d. Offsite Organization, Figure 6.2.1-1 - Page 6-3
 - e. Unit Organization, Figure 6.2.2-1 - Page 6-4.

B. DISCUSSION

1. The proposed change replaces the organization charts currently in the Technical Specifications with more general organizational requirements. Most aspects of the organization charts are already required by regulation, other Technical Specifications or the Updated Final Safety Analysis Report (UFSAR). The general requirements provided to replace the organization charts capture the essence of those organizational features depicted on the charts that are not covered by other specifications and are important to the NRC for ensuring the plant will be operated safely.
2. In Generic Letter (GL) 88-06, the staff determined that with appropriate changes to the administrative requirements, the onsite and offsite organization charts may be removed from the Technical Specifications. The staff also found that the above change will not reduce plant safety and it is generically applicable to all power reactors. The staff concluded that removal of the organization charts from Technical Specifications will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure, consistent with the Commission policy on Technical Specification improvement. The staff encouraged licensees to propose Technical Specification changes that are consistent with the guidance provided in GL 88-06.
3. Consistent with the NRC guidance provided in GL 88-06 and an NRC letter dated May 19, 1988 the following changes are proposed: R
R
 - a. The index is modified to indicate the revised Technical Specification subsection title headings.
 - b. Subsection 6.2.1 is revised to be applicable for both offsite and onsite organizations. The reference to Figure 6.2.1-1 is deleted and replaced with more general organizational requirements which capture the essential aspects of the organizational structure that are defined by the existing onsite and offsite organization charts.

- c. The reference to Figure 6.2.2-1 is deleted in Subsection 6.2.2. In addition, a statement is added designating those positions in the onsite organization that require a Senior Reactor Operator (SRO) license.
 - d. A statement is added in Subsection 6.2.2 designating the Manager Plant Operations as must having been an SRO or having been certified on a plant of this type. R
R
R
 - e. Figure 6.2.1-1 is deleted. R
 - f. Figure 6.2.2-1 is deleted. R
4. Attached to this proposed Technical Specification change are the affected Technical Specification pages.

C. JUSTIFICATION

1. The content required in the Administrative Controls Section of the Technical Specifications is specified in 10CFR50.36.c(5). The regulation requires that the Technical Specifications contain the controls and provisions that are necessary to assure operation of the facility in a safe manner and does not specifically require inclusion of organizational charts in the Technical Specifications.
2. Currently, organization changes result in System Energy Resources, Incorporated's (SERI) processing and the NRC's review of unnecessary license amendments. The benefit of this proposed change is that it would permit SERI to implement changes to the structure of the offsite or onsite organizations without first having to obtain NRC approval through the issuance of a license amendment to update organization charts in the Technical Specifications. Replacement of the organization charts with more general organizational requirements will eliminate this needless expenditure of resources for both organizations.
3. As stated in GL 88-06, it has been the NRC'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 the Technical Specifications that bear more directly on operational safety than organization charts. The staff summarized that many of the details shown on the onsite and offsite organization charts are not essential to the safe operation of the facility.
4. The staff's guidance issued in GL 88-06 stated that the only aspects of organization charts which are important to safety, not covered by other specifications, and must remain in Technical Specifications are those listed below:
 - (a) 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.

- (b) 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.
 - (c) 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.
 - (d) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license.
 - (e) Provisions of sufficient organizational freedom to be independent of operational pressures to those individuals who perform the functions of health physics, quality assurance, and training of the operating staff.
5. SERI is adding the above information to Technical Specification Subsections 6.2.1 and 6.2.2 to replace those aspects important to safety contained in the organization charts (Figure 6.2.1-1 and 6.2.2-1) which are being deleted. The staff concluded in GL 88-06 that since the above conditions will be maintained in the Technical Specifications, removal of the organization charts represents no reduction in current safety requirements. R
6. SERI has ensured that the organizational information described in (a) above is incorporated in the UFSAR and is referenced in the proposed Technical Specification change. The current Grand Gulf Nuclear Station UFSAR contains the organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions as specified by 10CFR50.34(b)(6)(i). As required by 10CFR50.71(e), SERI submits annual updates to the UFSAR. Therefore, the NRC will continue to be informed of organizational changes without having the organization charts in the Technical Specifications. R
7. Figure 6.2.2-1 currently specifies that certain positions require an SRO license. These qualification requirements are not designated elsewhere in the Technical Specifications outside of the organization chart in Figure 6.2.2-1. For this reason, a statement is being added to Technical Specification 6.2.2 specifying the positions which require an SRO license that were designated in Figure 6.2.2-1. R

8. Figure 6.2.2-1 also currently specifies that certain positions must have been an SRO or have been certified on a plant of this type. This same information is also specified in UFSAR Chapter 13.1. Consistent with the NRC guidance provided in GL 88-06 that only those details of the organizational charts essential to safe facility operation remain in the Technical Specifications, these position qualifications will be removed from the Technical Specifications and will remain in the UFSAR. However, the requirement for the Manager Plant Operations to have been an SRO or have been certified on a plant of this type is added to Technical Specification 6.2.2. This is consistent with the intent of 10CFR50.54(1) which stipulates that those individuals responsible for directing the licensed activities of licensed operators shall themselves be licensed as an SRO. Since the Manager Plant Operations does not directly supervise licensed operators who perform licensed activities, the position does not require an SRO license, unlike the Operations Superintendent who is required to hold an SRO license because reporting to this position are licensed operators who perform licensed activities. However, SERI considers it prudent to retain the Manager Plant Operations qualification requirement in the Technical Specifications because of this position's influence upon safe plant operations. R
R
R
R
R
R
R
R
R
R
R
R
R
R
R
R
9. The other three management positions (GGNS General Manager, Manager Plant Maintenance, Manager Plant Support) qualifications need not be specified in the Technical Specifications because these positions do not exert direct influence upon the licensed activities performed at the facility to ensure safe operation. Therefore, consistent with the GL 88-06 guidance that only the aspects of the organization charts which are important to safety and are not covered by other specifications, must remain in the Technical Specifications, it is sufficient to specify the position requirements for these three positions only in the UFSAR. R
R
R
R
R
R
R
R
R
10. Table 6.2.2-1 will remain to indicate the minimum shift crew composition and the number of personnel required to have an RO license on shift. R
R
R
11. Therefore, no position qualifications important to safety will be lost when Figure 6.2.2-1 is deleted. R
R
12. The Technical Specifications have been examined for additional references to the organization charts and none were found other than those in the attached affected Technical Specification pages.
13. The guidance provided in GL 88-06 has been used to prepare this proposed Technical Specification amendment request. The proposed changes do not differ from the GL 88-06 guidance other than in the titles and names of various positions.

D. SIGNIFICANT HAZARDS CONSIDERATION

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because replacement of the organization charts with more general organizational requirements in the Technical Specifications is administrative in nature. No physical alterations of plant configuration or changes to setpoints or operating parameters are proposed. These changes do not alter SERI's commitment to maintain a management structure that contributes to the safe operation and maintenance of the plant. As in the past, the NRC will continue to be informed of organizational changes through other required controls. 10CFR50.34(b)(6)(i) requires that the applicants' organizational structure be included in the UFSAR. Chapter 13 of the UFSAR provides a description of the organization and detailed organization charts. As required by 10CFR50.71(e), SERI submits annual updates to the UFSAR. The positions which are important to safe operation of the facility will continue to be specified in the Technical Specifications. The position qualifications for the GGNS General Manager, Manager Plant Maintenance, and Manager Plant Support being removed from the Technical Specifications does not change the consequences or probability of a previously evaluated accident because these positions do not exert direct influence upon licensed activities performed at the facility to ensure safe operation. Therefore the probability or consequences of any previously evaluated accident are not increased due to this proposed amendment. R
R
R
R
R
R
R
2. The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed change is administrative in nature, and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed. The same level of position qualifications are maintained and unaltered in the Technical Specifications except for those positions that do not exert direct influence upon licensed activities performed at the facility to ensure safe operation. Therefore the possibility of a new or different kind of previously unevaluated accident has not been created. R
R
R
R
R
3. The proposed amendment does not involve a significant reduction in a margin of safety. Since the proposed amendment retains those aspects of the organizational charts which are important to safety, removal of the organization charts represents no reduction in the current margin of safety. No position qualifications are being changed in the Technical Specifications except for those positions that do not exert direct influence upon licensed activities performed at the facility to ensure safe operation. Therefore the current margin of safety is not reduced. R
R
R
R

Based on the above reasoning, SERI has determined that the proposed amendment does not involve a significant hazards consideration.

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.1 RESPONSIBILITY</u>	6-1
<u>6.2 ORGANIZATION</u>	
6.2.1 OFFSITE X AND ONSITE ORGANIZATIONS.....	6-1
6.2.2 UNIT STAFF.....	6-1
6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)	
Function.....	6-2
Composition.....	6-2
Responsibilities.....	6-6
Authority.....	6-6
6.2.4 SHIFT TECHNICAL ADVISOR.....	6-6
<u>6.3 UNIT STAFF QUALIFICATIONS</u>	6-6
<u>6.4 TRAINING</u>	6-6
<u>6.5 REVIEW AND AUDIT</u>	
6.5.1 PLANT SAFETY REVIEW COMMITTEE (PSRC)	
Function.....	6-6
Composition.....	6-7
Alternates.....	6-7
Meeting Frequency.....	6-7
Quorum.....	6-7
Responsibilities.....	6-7
Authority.....	6-8
Records.....	6-8
6.5.2 SAFETY REVIEW COMMITTEE (SRC)	
Function.....	6-9
Composition.....	6-9
Alternates.....	6-9
Consultants.....	6-10
Meeting Frequency.....	6-10
Quorum.....	6-10

8805100 197
7pp.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The GGNS General Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.-

6.1.2 The Shift Superintendent or, during his absence from the Control Room, a designated individual shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice President, Nuclear Operations shall be reissued to all station personnel on an annual basis.

5.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

~~The offsite organization for unit management and technical support shall be as shown on Figure 6.2.1-1.~~

Insert 1 →

6.2.2 UNIT STAFF

The unit organization shall be ^{subject to the following:} ~~as shown on Figure 6.2.2-1 and:~~

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1.
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator shall be in the Control Room.
- c. A health physics technician* shall be onsite when fuel is in the reactor.
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times*. The Fire Brigade shall not include the Shift Superintendent, the STA, the two other members of the minimum shift crew necessary for safe shutdown of the unit, and any personnel required for other essential functions during a fire emergency. At least one AO shall be available to respond to non-fire-fighting commands from the Control Room.

*The number of health physics technicians and Fire Brigade personnel may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

Insert 1

Onsite and offsite organizations shall be established for unit organization 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 UFSAR and updated at least annually. R
- b. The GGNS General Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President, Nuclear Operations 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.
- 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.

ADMINISTRATIVE CONTROLSUNIT STAFF (Continued)

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven-day period, all excluding shift turnover time.
3. A break of at least eight hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the GGNS General Manager or his designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the GGNS General Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

Insert 2 →

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)FUNCTION

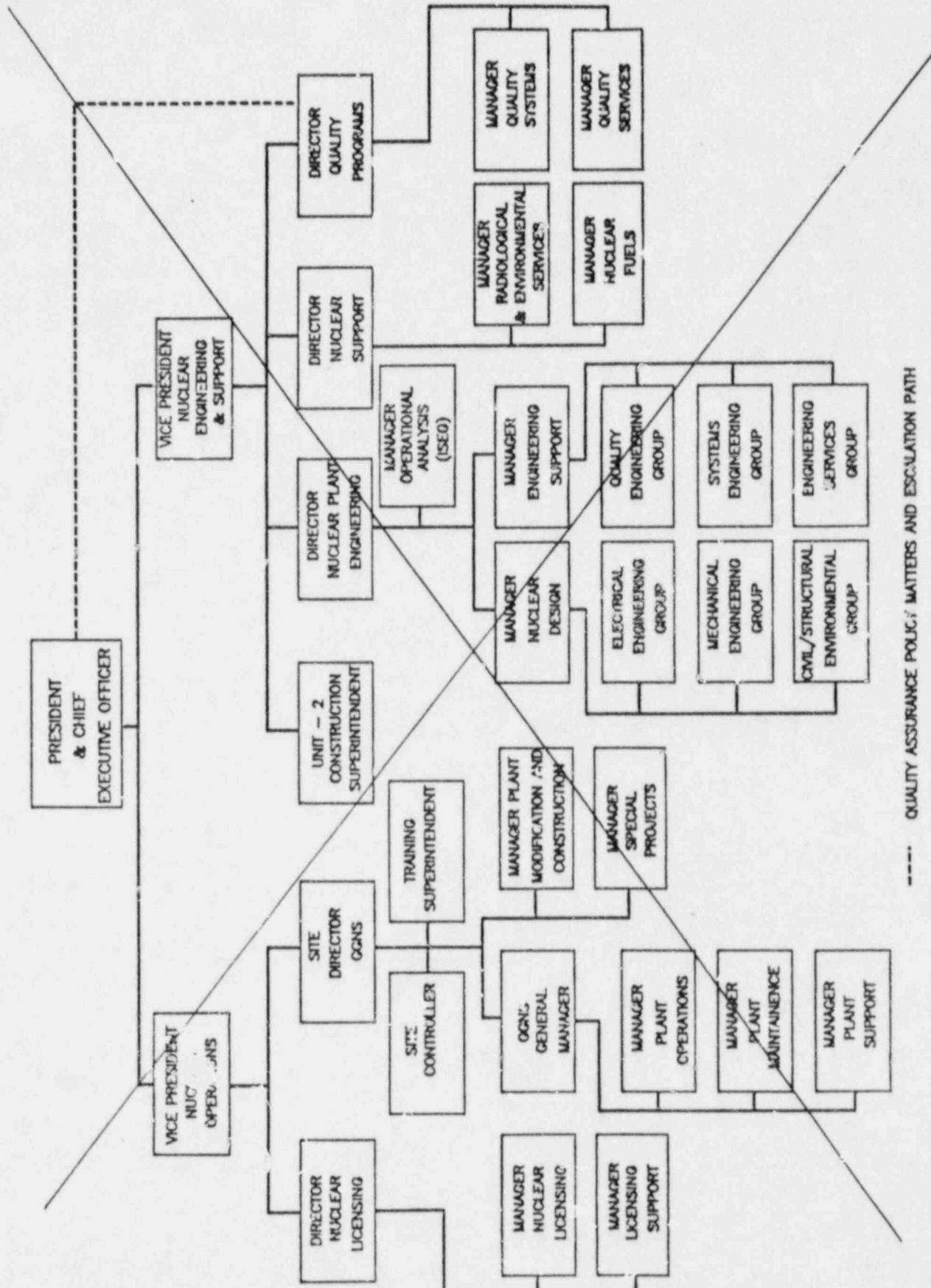
6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISEG shall be composed of a multi-disciplined dedicated, onsite, group with a minimum assigned complement of five engineers or appropriate specialists.

Insert 2

- g. The Operations Superintendent, Shift Superintendents, Operations Assistants, and Shift Supervisors shall each hold a Senior Reactor Operator License.
- h. The Manager Plant Operations must have been a Senior Reactor Operator or have been certified on a plant of this type. R
R



----- QUALITY ASSURANCE POLICY MATTERS AND ESCALATION PATH

FIGURE 6.2.1-1 OFFSITE ORGANIZATION
DELETE

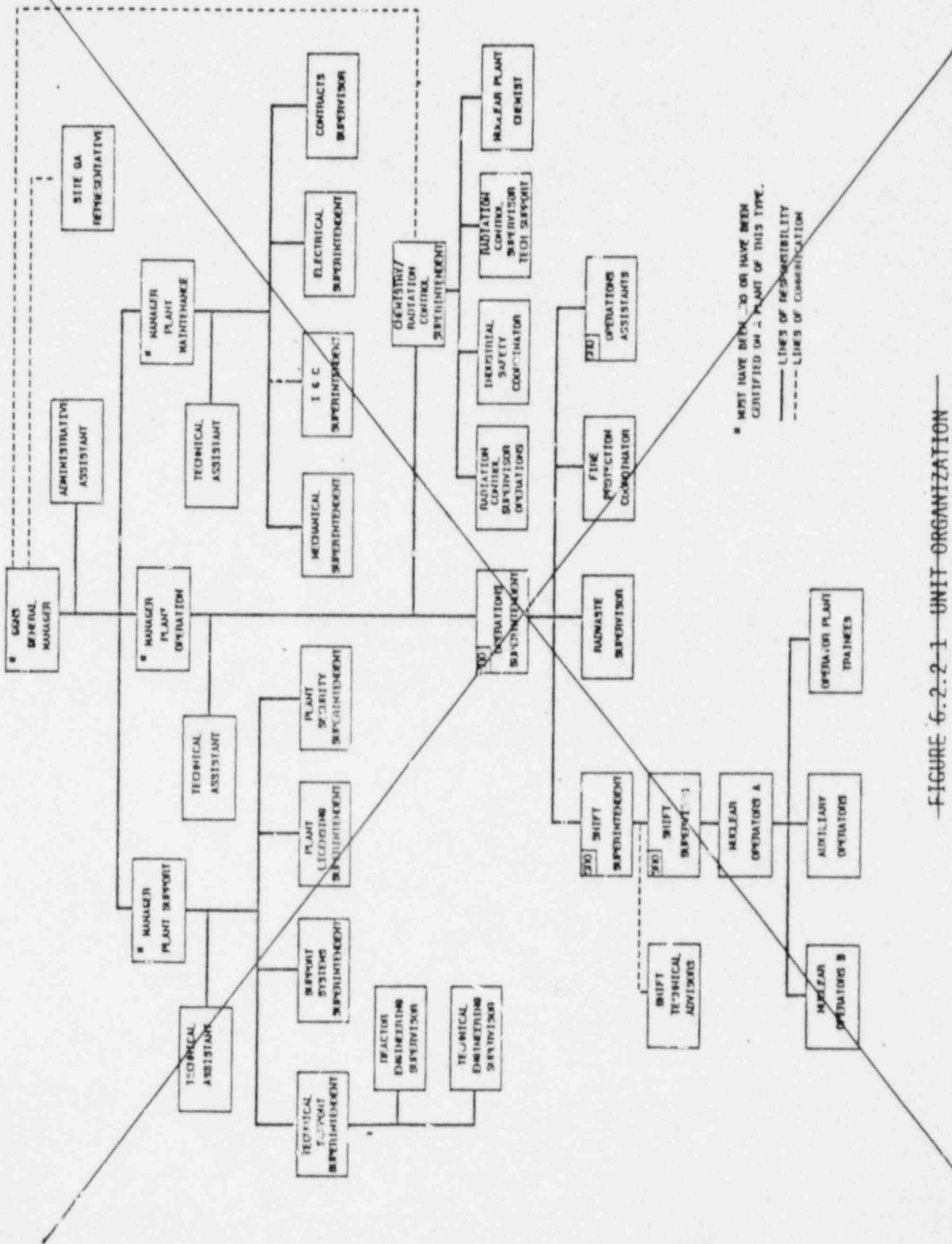


FIGURE 6-2.2-1 UNIT ORGANIZATION
DELETE