



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 100 TO FACILITY OPERATING
LICENSE NO. DPR-54
RANCHO SECO NUCLEAR GENERATING STATION
DOCKET NO. 50-312

1.0 INTRODUCTION

By letters dated July 1, 1988 and September 8, 1988, the Sacramento Municipal Utility District (SMUD) requested an amendment to the Technical Specifications (TS) appended to Facility Operating License No. DPR-54 for the Rancho Seco Nuclear Generating Station. The proposed amendment would change the TS by revising TS Section 6.0, Administrative Controls, to remove organizational charts as depicted by Figures 6.2-1 and 6.2-2. General regulatory requirements related to the plant organization were added to the TS to ensure that organizational features important to safe plant operations are maintained. Per the recommendations contained in Generic Letter (GL) 88-06, organizational charts were transferred from the TS to the Updated Safety Analysis Report.

2.0 EVALUATION

The NRC staff has evaluated the proposed changes and has concluded that they are acceptable. The staff's evaluation is given below.

A. Removal of Licensee Organization Charts from the TS

The content required in the Administrative Controls Section of the Technical Specifications is specified in 10 CFR 50.25c(5). That provision requires that the technical specifications contain provisions relating to organization and management procedures, recordkeeping, review and audit, and reporting that are necessary to assure operation of the facility in a safe manner. It does not specifically require inclusion of organizational charts in the technical specifications.

In (GL) 88-06, "Removal of Organizational Charts from Technical Specification Administrative Control Requirements", dated March 22, 1988, the NRC has provided guidance for the removal of organizational charts from the TS. GL 88-06 concludes that the removal of organization charts from the technical specifications will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure.

A review of the existing Rancho Seco Administrative Controls TS and the changes proposed by this amendment indicates that the recommendations included in GL 88-06 are applicable to the Rancho Seco TS and that the changes proposed by the licensee follow the guidance contained in the Generic Letter.

As in the past, the NRC will continue to be informed of organizational changes and management personnel titles through other required controls. For example, 10 CFR Part 50.34(b)(6)(i) requires that the applicant's organizational structure be included in the USAR. As required by 10 CFR 50.71(e), the licensee submits annual revisions to the FSAR Update.

The removal of the organization charts represent no reduction in the current safety requirements, because the following conditions are included in the technical specifications by these amendments, per the recommendations of GL 88-06:

- (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 equivalent forms of documentation.
- (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.
- (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.
- (4) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator license.
- (5) 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 operating staff.

As discussed above, because removal of licensee organization charts from the TS meets the requirements of 10 CFR 50.36, and because these amendments meet the guidelines of GL 88-06, the NRC staff finds them acceptable.

3.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Chief of the Radiological Health Branch, State Department of Health Service, State of California, of the proposed determination of no significant hazards consideration. No comments were received.

4.0 ENVIRONMENTAL CONCLUSION

These amendments involve changes in administrative procedures and requirements. Accordingly, these amendments meet 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 these amendments.

5.0 CONCLUSION

We have 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 (3) the issuance of the amendment will not be inimical to common defense and security or to the health and safety of the public.

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Dated: September 28, 1988