

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence. R62

6.1.2 The Manager of Radiological Control shall be responsible for implementing the radiological environmental program and dose calculation and projection as described in the Offsite Dose Calculation Manual (ODCM). R62

6.1.3 The Shift Supervisor (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 Site Director, shall be reissued to all station personnel on an annual basis. R62

6. ORGANIZATION

~~OFFSITE~~

OFFSITE AND ONSITE ORGANIZATIONS

6.2.1 ~~The offsite organization for unit management and technical support shall be as shown in Figure 6.2-1.~~

INSERT "d" →

~~UNIT STAFF~~

FACILITY STAFF

6.2.2 ~~The Unit organization shall be as shown in Figure 6.2-2 and:~~

- a. Each on-duty ^{unit} shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the ^{unit} Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization 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 from 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 organizational 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 and will be updated in accordance with 10 CFR 50.71(e).
- b. There shall be an individual executive position (corporate officer) in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
- c. There shall be an individual management position in the onsite organization having responsibility for overall unit safe operation, and this position shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- 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 CONTROLS

- c. A Radiological Control technician[#] shall be onsite when fuel is in the reactor. | R62
- 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. | FP
- e. A Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include the Shift Supervisor and 2 other members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency. | R62

f. *The Operations Manager shall hold a Senior Reactor Operator license.*

#The Radiological Control technician and fire brigade composition 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. | R62

DELETE
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FIGURE

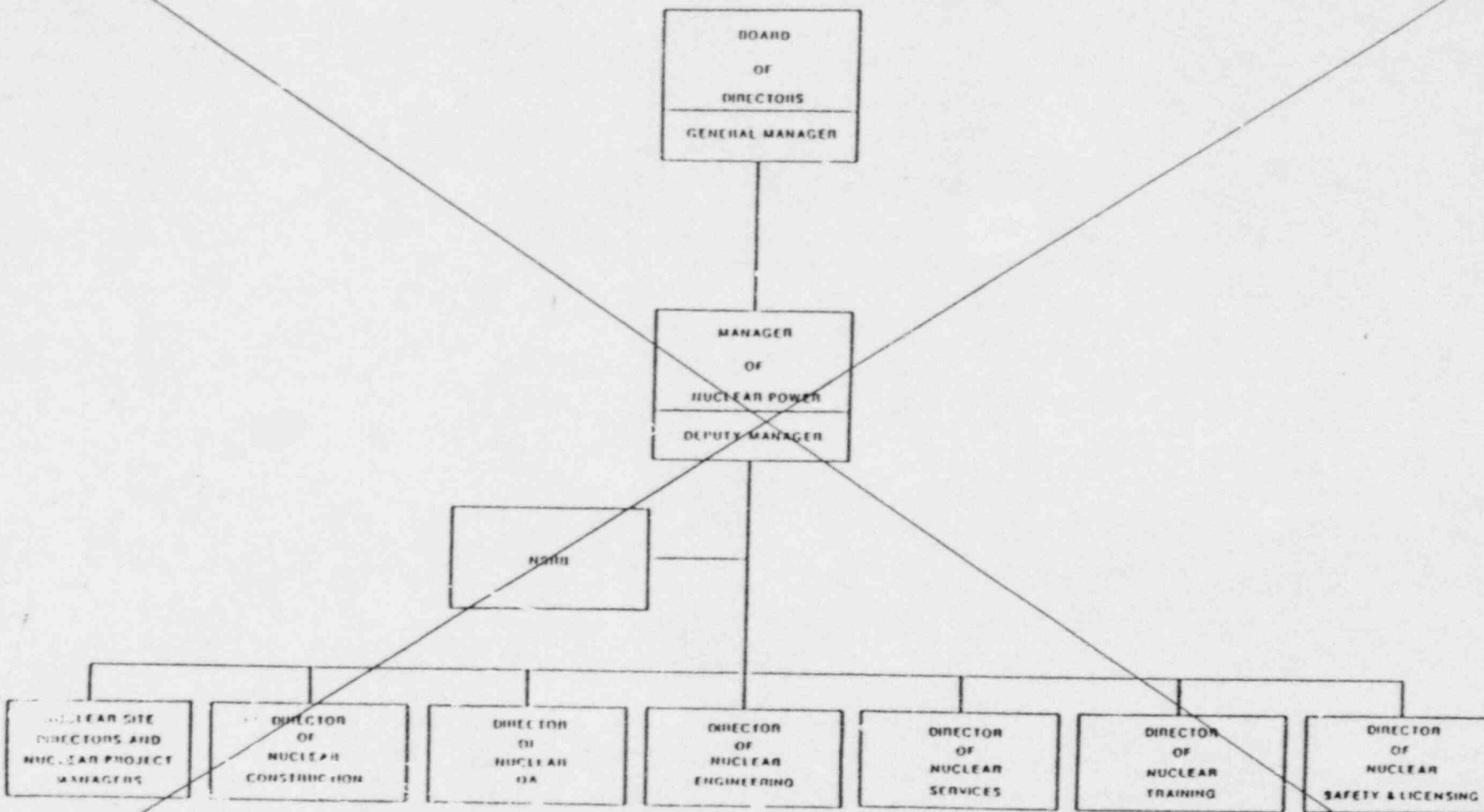
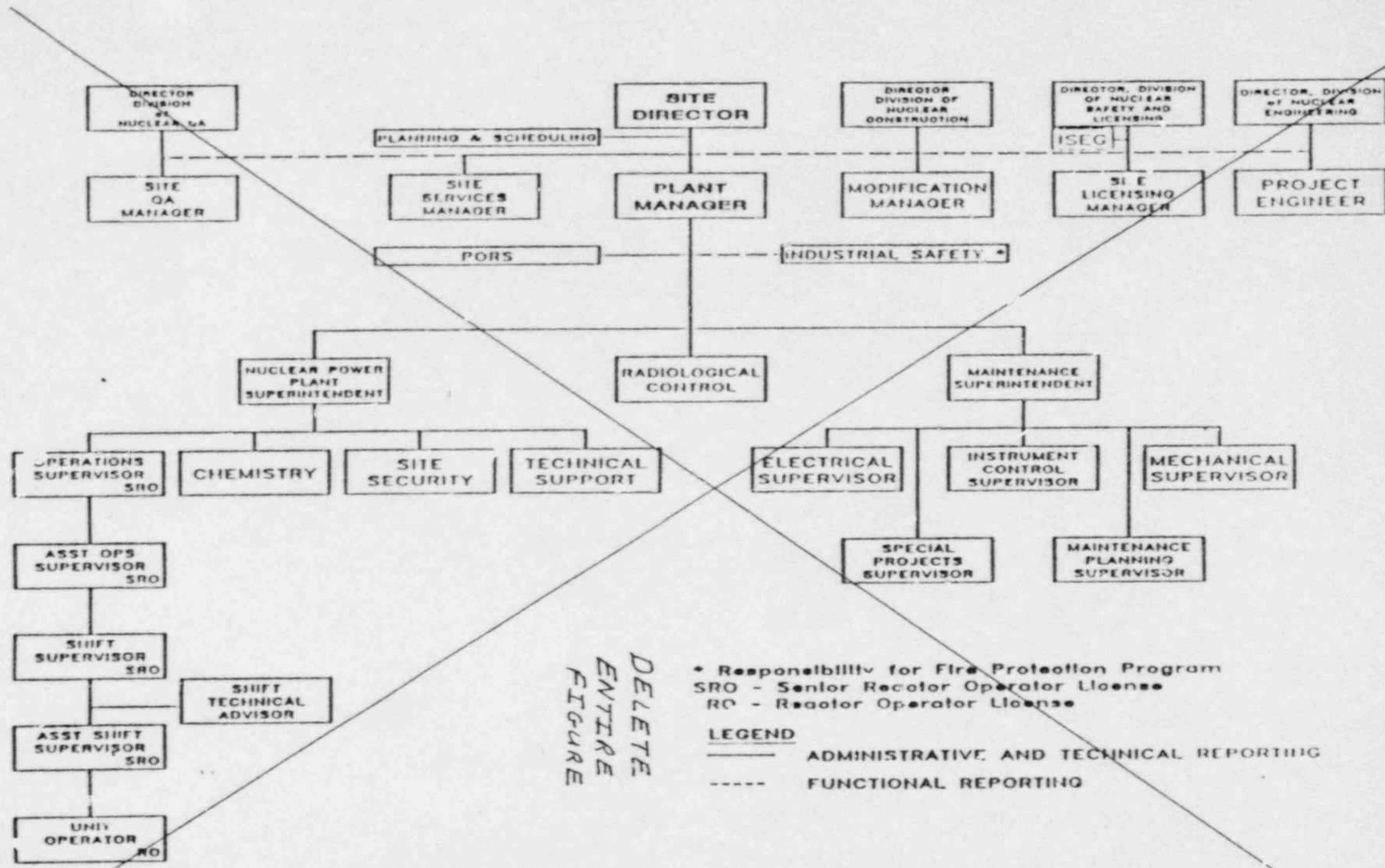


Figure 6.2-1 Offsite Organization for Facility Management and Technical Support



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FIGURE

* Responsibility for Fire Protection Program
 SRO - Senior Reactor Operator License
 RO - Reactor Operator License

LEGEND
 ——— ADMINISTRATIVE AND TECHNICAL REPORTING
 - - - - - FUNCTIONAL REPORTING

FIGURE 6.2-2

FACILITY ORGANIZATION - SEQUOYAH NUCLEAR PLANT

ADMINISTRATIVE CONTROLS

Changes Proposed by TS 87-44

6.4 TRAINING

6.4.1 A retraining and replacement training program ^{Operations facilities} (for the ~~unit~~ staff shall be maintained under the direction of the ~~Nuclear Power Plant (NPP)~~ Superintendent and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.)

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6.5 REVIEW AND AUDIT

6.5.0 The ^{Senior Vice President,} ~~Manager of Nuclear Power~~ is responsible for the safe operation of all TVA power plants. ~~The functional organization for Review and Audit is shown on Figure 6.2-1.~~

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6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

R62

COMPOSITION

6.5.1.2 The PORC shall be composed of the:

- Chairman: Plant Manager
- Member: ~~Superintendent (NPP or Maintenance)~~ ^{Operations Superintendent}
- Member: ~~Operations Group Manager or Assistant Operations Group Manager~~
- Member: Site Radiological Control Superintendent
- Member: Maintenance ~~Group Manager~~, ~~(I), (E), or (M)~~ ^{Superintendent}
- Member: Technical Support ~~Services Group Manager~~ ^{Superintendent}
- Member: Quality Engineering ~~and Control~~ Manager
- Member: ^{Division of Nuclear Engineering Representative}

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Changes Proposed by TS 87-44

ADMINISTRATIVE CONTROLS

QUALIFICATIONS

Senior Vice President, Nuclear Power

6.5.2.3 The Chairman, members, and alternate members of the NSRB shall be appointed in writing by the ~~Manager of Nuclear Power~~ and shall have an academic degree in engineering or a physical science field, or the equivalent; and in addition, shall have a minimum of five years technical experience in one or more areas given in 6.5.2.1. No more than two alternates shall participate as voting members in NSRB activities at any one time. | R62

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSRB Chairman to provide expert advice to the NSRB.

MEETING FREQUENCY

6.5.2.5 The NSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 The minimum quorum of the NSRB necessary for the performance of the NSRB review and audit functions of these technical specifications shall consist of more than half the NSRB membership or at least 5 members, whichever is greater. This quorum shall include the Chairman or his appointed alternate and the NSRB members, including appointed alternate members, meeting the requirements of Specification 6.5.2.3. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.2.7 The NSRB shall be cognizant of review of: | R62

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications or this Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.

ADMINISTRATIVE CONTROLS

- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures for SOLIDIFICATION of radioactive wastes at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977 or Regulatory Guide 1.21, Rev. 1, 1974 and Regulatory Guide 4.1, Rev. 1, 1975, at least once per 12 months.

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AUTHORITY

6.5.2.9 The NSRB shall report to and advise the ~~Manager of Nuclear Power~~ *Senior Vice President, Nuclear Power* on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

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RECORDS

6.5.2.10 Records of NSRB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the ~~Manager of Nuclear Power~~ *Senior Vice President, Nuclear Power* within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the ~~Manager of Nuclear Power~~ *Senior Vice President, Nuclear Power* within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the ~~Manager of Nuclear Power~~ and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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6.5.3 RADIOLOGICAL ASSESSMENT REVIEW COMMITTEE (RARC)

Function

6.5.3.1 The SQN RARC shall function to advise the Manager of Radiological Control and the Plant Manager on all matters related to radiological assessments involving dose calculations and projections and environmental monitoring.

R62

Composition

6.5.3.2 The SQN RARC shall be composed of the:

- Chairman: Technical Assistance Section Supervisor
- Member: Health Physicist, Gaseous, Radiological Control
- Member: Health Physicist, Liquid, Radiological Control

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Table 6.2-1 Minimum shift crew composition
With Unit 2 in Mode 5 or 6 or De-fueled

Position	Number of individuals required to fill position	
	Modes 1, 2, 3, & 4	Modes 5 & 6
JS	1 ^a	1 ^a
SRO	1	None
RO	2	1
AO	2	2 ^b
STA	1	None

With Unit 2 in Modes 1, 2, 3, or 4

Position	Number of individuals required to fill position	
	Modes 1, 2, 3, & 4	Modes 5 & 6
SS	1 ^a	1 ^a
SRO	1 ^a	None
RO	2 ^b	1
AO	2 ^b	1
STA	1 ^a	None

^aIndividual may fill the same position on Unit 2.

^bOne of the two required individuals may fill the same position on Unit 2.

- SS - Shift Supervisor with a Senior Reactor Operators License on Unit 1
- SRO - Individual with a Senior Reactor Operators License on Unit 1
- RO - Individual with a Reactor Operators License on Unit 1
- AO - Auxiliary Operator
- STA - Shift Technical Advisor

Except for the Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor from the Control Room while the unit is in MODE 1, 2, 3 or 4, an individual (other than the Shift Technical Advisor) with a valid SRO license shall be designated to assume the Control Room command function. During any absence of the Shift Supervisor from the Control Room while the Unit is in Mode 5 or 6, an individual with a valid SRO or RO license (other than the Shift Technical Advisor) shall be designated to assume the Control Room command function.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

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6.1.2 The Manager of Radiological Control shall be responsible for implementing the radiological environmental program and dose calculations and projections as described in the Offsite Dose Calculation Manual (ODCM).

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6.1.3 The Shift Supervisor (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 Site Director shall be reissued to all station personnel on an annual basis.

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6.2 ORGANIZATION

~~OFFSITE~~

OFFSITE AND ONSITE ORGANIZATIONS

6.2.1 ~~The offsite organization for unit management and technical support shall be as shown on Figure 6.2-1.~~

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INSERT "A" →

~~UNIT STAFF~~

FACILITY STAFF

6.2.2 ~~The Unit organization shall be as shown on Figure 6.2-2 and:~~

- a. Each on duty ^{unit} shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the ^{unit} Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization 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 from 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 organizational 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 and will be updated in accordance with 10 CFR 50.71(e).
- b. There shall be an individual executive position (corporate officer) in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
- c. There shall be an individual management position in the onsite organization having responsibility for overall unit safe operation, and this position shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- 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 CONTROLS

- c. A Radiological Control technician[#] shall be onsite when fuel is in the reactor. |R50
- 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 Fire Brigade of at least 5 members shall be maintained onsite at all times[#]. The Fire Brigade shall not include the Shift Supervisor and the 2 other members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.

f. *The Operations Manager shall hold a Senior Reactor Operator license.*

[#] The Radiological Control technician and fire brigade composition 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. |R50

DELETE
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FIGURE

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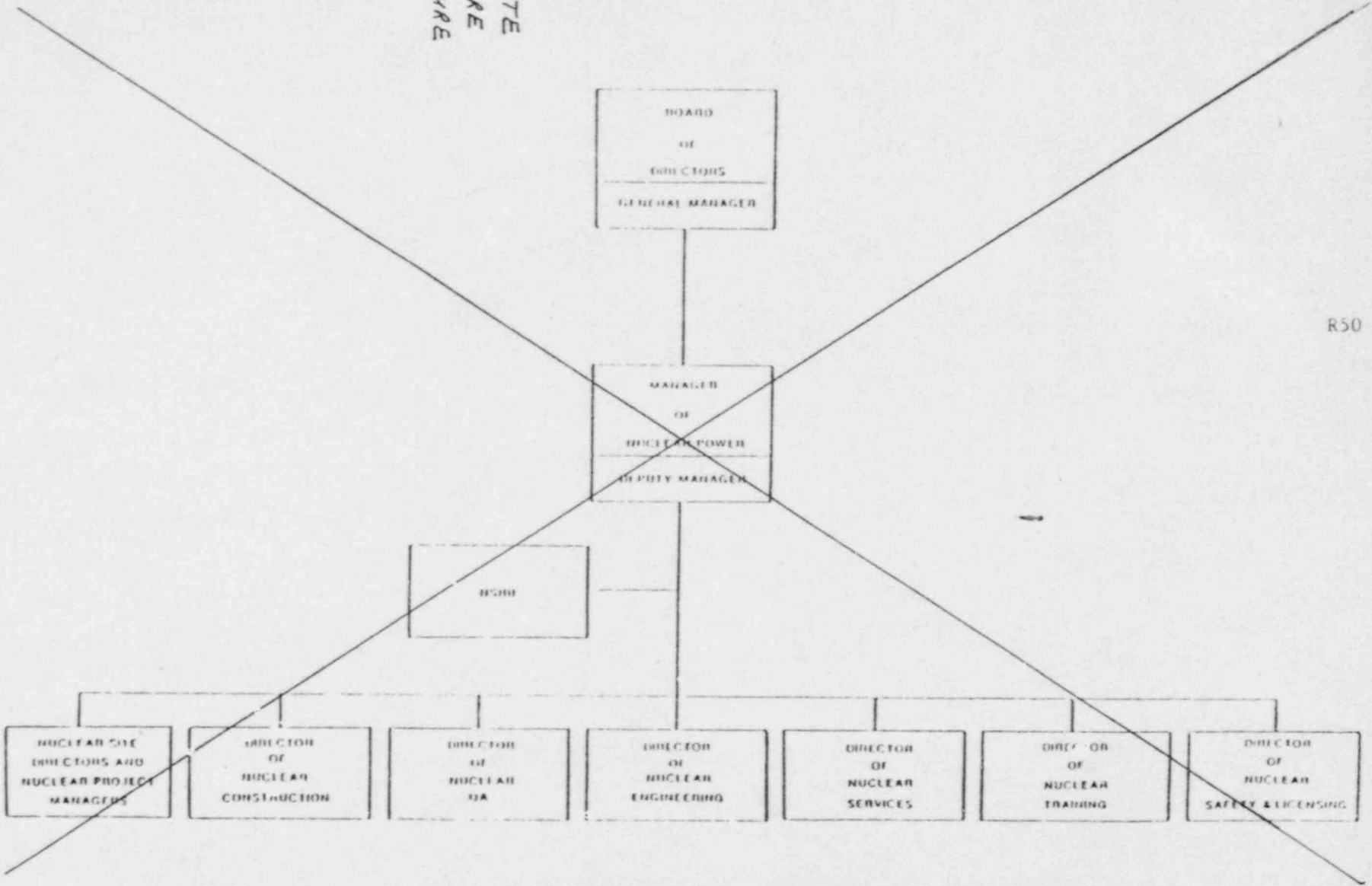


FIGURE 6.2-1 OFFISTE ORGANIZATION FOR FACILITY MANAGEMENT AND TECHNICAL SUPPORT

SEQUOYAH - UNIT 2

6-3

September 10, 1982
Amendment No. 50.

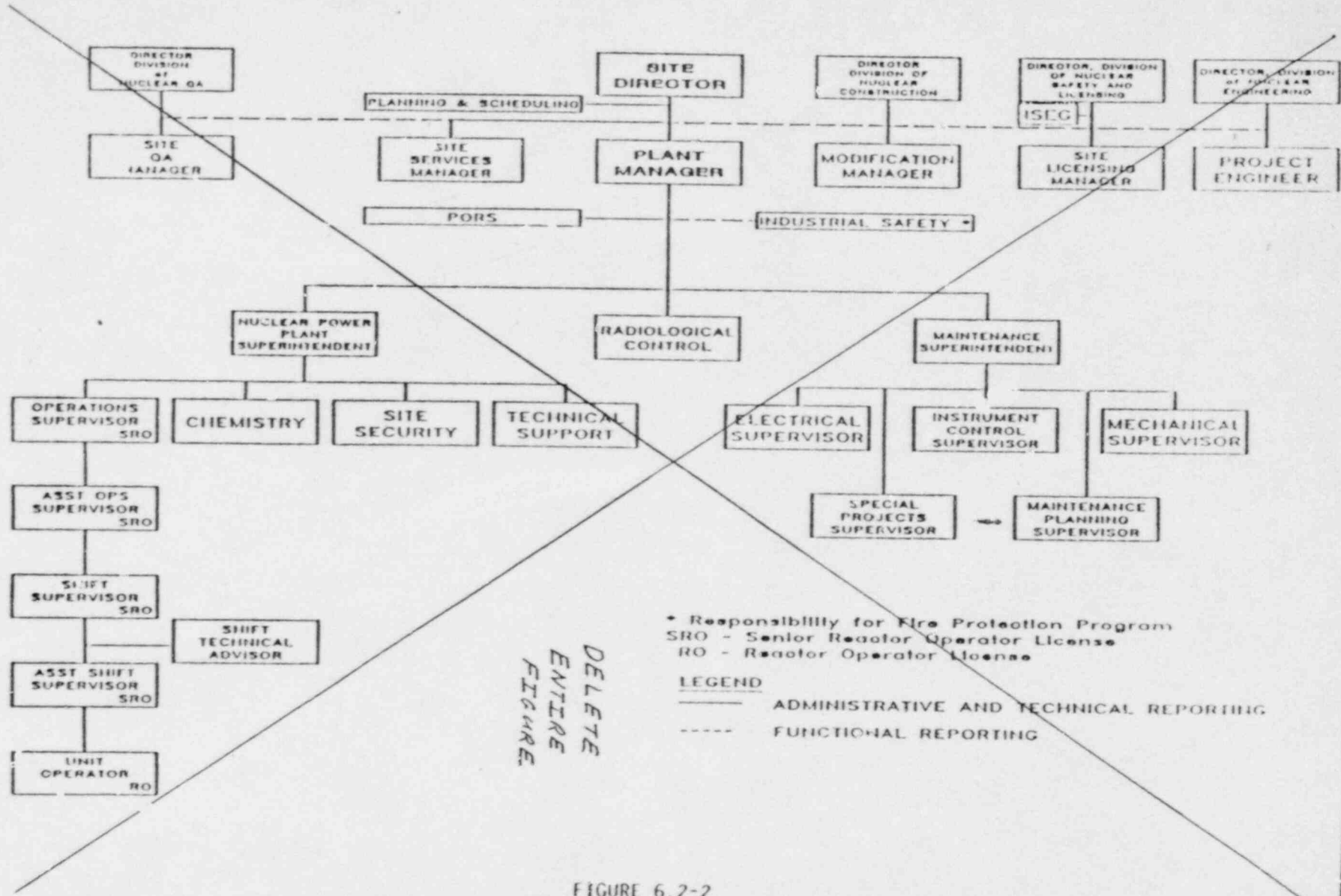


FIGURE 6.2-2
FACILITY ORGANIZATION - SEQUOYAH NUCLEAR PLANT

ADMINISTRATIVE CONTROLS

Changes Proposed by TS 87-44

6.4 TRAINING

6.4.1 A retraining and replacement training program for the ^{Operations facility} ~~unit~~ staff shall be maintained under the direction of the ~~Nuclear Power Plant (NPP)~~ Superintendent and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

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6.5 REVIEW AND AUDIT

6.5.0 ^{Senior Vice Presidents} The ~~Manager~~ of Nuclear Power is responsible for the safe operation of all TVA power plants. ~~The functional organization for Review and Audit is shown on Figure 6.2-1.~~

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6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

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COMPOSITION

6.5.1.2 The PORC shall be composed of the:

- Chairman: Plant Manager
- Member: ~~Superintendents (NPP or Maintenance)~~ Operations Superintendent
- Member: Operations ~~Group Manager or Assistant Operations Group Manager~~
- Member: Site Radiological Control Superintendent
- Member: Maintenance ~~Group Manager, (I), (II), or (III)~~ Superintendent
- Member: Technical Support ~~Services Group Manager~~ Superintendent
- Member: Quality Engineering ~~and Control~~ Manager
- Member: Division of Nuclear Engineering Representative

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Changes Proposed by TS 87-44

ADMINISTRATIVE CONTROLS

Changes Proposed
by TS 87-44

as the individual/group which designed the modifications. Proposed modifications to structures, systems, and components that affect plant nuclear safety and the implementing workplans shall be approved prior to implementation by the Plant Manager, ^{Operations} ~~NPP~~ Superintendent, ~~or~~ Maintenance Superintendent, or *Technical Support Superintendents*.

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- c. Individuals responsible for reviews performed in accordance with Specifications 6.5.1A.1a and -b, shall be designated by approved written procedures. Each such review shall be performed by qualified personnel of the appropriate discipline and shall include a determination of whether or not additional, cross-disciplinary review is necessary. Each review shall also include determination of whether or not an ^{such} unreviewed safety question is involved pursuant to Section 10 CFR 50.39.

6.5.2 NUCLEAR SAFETY REVIEW BOARD (NSRB)

FUNCTION

6.5.2.1 The NSRB shall function to provide for independent review and audit to assure adequacy of designated activities in the areas of:

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- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The NSRB shall be composed of at least five members, including the Chairman. Members of the NSRB may be from the Office of Nuclear Power, or other TVA organization or external to TVA.

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QUALIFICATIONS

Senior Vice President, Nuclear Power

6.5.2.3 The Chairman, members, and alternate members of the NSRB shall be appointed in writing by the ~~Manager of Nuclear Power~~ and shall have an academic degree in engineering or a physical science field, or the equivalent; and in addition, shall have a minimum of five years technical experience in one or more areas given in 6.5.2.1. No more than two alternates shall participate as voting members in NSRB activities at any one time.

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ADMINISTRATIVE CONTROLS

AUTHORITY

Senior Vice President, Nuclear Power

6.5.2.9 The NSRB shall report to and advise the ~~Manager of Nuclear Power~~ on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

|| R50

RECORDS

6.5.2.10 Records of NSRB activities shall be prepared, approved and distributed as indicated below:

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- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the ~~Manager of Nuclear Power~~ within 14 days following completion of the review.
Senior Vice President, Nuclear Power
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the ~~Manager of Nuclear Power~~ and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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6.5.3 RADIOLOGICAL ASSESSMENT REVIEW COMMITTEE (RARC)

Function

6.5.3.1 The SQN RARC shall function to advise the Manager of Radiological Control and the Plant Manager on all matters related to radiological assessments involving dose calculations and projections and environmental monitoring.

|| R50

Composition

6.5.3.2 The SQN RARC shall be composed of the:

|| R50

- Chairman: Technical Assistance Section Supervisor
- Member: Health Physicist, Gaseous, Radiological Control
- Member: Health Physicist, Liquid, Radiological Control
- Member: Meteorologist, Air Quality Branch
- Member: Chemical Engineer, Chemistry Section, SQN
- Member: Health Physicist, Environmental Monitoring, Radiological Control

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Alternates

6.5.3.3 All alternate members shall be appointed in writing by the SQN RARC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SQN RARC activities at any one time.

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Meeting Frequency

6.5.3.4 The SQN RARC shall meet at least once per six months or as requested by the SQN RARC Chairman, his designated alternate, or a plant representative.

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ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-88-12)

DESCRIPTION AND JUSTIFICATION FOR

DELETION OF ORGANIZATION CHARTS FROM SECTION 6

ENCLOSURE 2

Description of Change

TVA proposes to modify the SQN units 1 and 2 TSs to delete the organization charts (figures 6.2-1 and 6.2-2) from section 6 in accordance with Generic Letter (GL) 88-06. General requirements for the organizational structure are added to section 6.2. Section 6 is also revised to change the title of the Manager of Nuclear Power and to change the references to the unit staff and organization.

Reason for Change

The deletion of organization charts from the TSs was originally proposed by the Shearon Harris plant as a lead-plant technical specification improvement item in a June 12, 1987 letter. NRC issued a safety evaluation report (SER) on January 27, 1988, approving the Shearon Harris proposal. GL 88-06 was issued on March 22, 1988, to provide guidance for follow-on technical specification changes by other plants. This proposed change is submitted following the guidance of GL 88-06.

The deletion of the organization charts from the TSs and the addition of general organization requirements will eliminate the need for a license amendment to implement organization name changes or changes in lines of authority and responsibility. This will eliminate an unnecessary expenditure of valuable resources by both TVA and NRC to facilitate organization changes.

The title change for the Manager of Nuclear Power is made to reflect a change in corporate management titles. The change makes the title consistent to those of similar positions in other large companies.

Also, the references to unit staff and organization in section 6 are changed to facility staff and organization for consistency with other information in section 6.

Justification for Change

The deletion of the organization charts (figures 6.2-1 and 6.2-2) and the addition of general organization requirements are administrative in nature. As described in GL 88-06 and the Shearon Harris SER, NRC has determined that much of the detail of the organization charts has little impact on the safe operation of the plant. Several features of the organizational structure that are important to safety are captured in other specifications. As described by GL 88-06, the information that is deleted from TS section 6 is currently contained in Final Safety Analysis Report (FSAR) chapter 13.

To facilitate the deletion of the organization charts, GL 88-06 provided guidance for general organization requirements that are to remain in the TSs. These general requirements are listed below.

- (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.

- (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 (RO) 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 the operating staff.

These general requirements are incorporated into section 6.2 of the TS. The approved Shearon Harris specifications are used as a template for the wording of the general requirements. This eliminates specific position titles from the requirements, thus eliminating the need for a license amendment to change a position name.

The organization charts and descriptions of the FSAR are used to satisfy the requirements of (1) above. This document contains the necessary organizational detail and descriptions. Specifically, section 13.1.3 of the FSAR provides the necessary information to satisfy requirement (2) above. FSAR section 13.1.4.8 similarly satisfies requirement (3) above. The functions and responsibilities for the onsite positions required to hold a SRO or RO [see requirement (4)] license are described in FSAR section 13.1.4.8.5. The FSAR is updated annually in accordance with 10 CFR 50.71(e).

The title change for the Manager of Nuclear Power is administrative in nature. The change to Senior Vice President, Nuclear Power, is made so that the position title is consistent with similar position titles in other large companies. There are no changes in lines of authority or responsibility related to this change.

Similarly, the change in references to unit staff and organization is administrative in nature. The change to facility staff and organization is made for consistency with other information in section 6.

In summary, the proposed changes to section 6 described above are administrative in nature. The changes implement a TS improvement item as described in GL 88-06 and provide consistency between various SQN TS sections.

ENCLOSURE 3

PROPOSED TECHNICAL SPECIFICATION CHANGES

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-88-12)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

Significant Hazards Evaluation

TVA has evaluated the proposed TS change and determined that it does not represent a significant hazards consideration based on criteria established in 10 CFR 50.92(c). Operation of SQN in accordance with the proposed amendment will not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated. This proposed change is administrative in nature and is intended to eliminate the need for NRC approval of a license amendment before implementation of an organization change. The changes to titles and references are also administrative in nature. The functions specified in section 6 important to the safe operation of SQN have not been altered or deleted. There are no hardware, procedure, personnel, or analysis changes represented by this proposal that adversely affect the probability of occurrence or the consequences of an accident previously evaluated in the safety analysis report.
- (2) create the possibility of a new or different kind of accident from any previously analyzed. This proposed change is administrative in nature and is intended to eliminate an unnecessary expenditure of resources to facilitate organization changes. The changes to titles and references are also administrative in nature. The functions important to safety will continue to be performed by those individuals who are technically competent to perform these functions; therefore, the potential for the increase of a possibility of an accident or a new or different type of accident is reduced rather than increased because of having the appropriate personnel designated for these functions.
- (3) involve a significant reduction in a margin of safety. Because general organization requirements will be maintained in the TS, removal of the organizational charts represents no reduction in current safety requirements. These changes will simply allow the implementation of changes in the organization structure without obtaining NRC approval. The changes to position titles and group references, as an administrative change, will also not reduce the margin of safety.