



ARKANSAS POWER & LIGHT COMPANY
CAPITOL TOWER BUILDING/P. O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 377-3525

T. GENE CAMPBELL
Vice President - Nuclear

June 10, 1988

2CAN068807

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Attn: Mr. Jose A. Calvo, Director
Project Directorate IV
Division of Reactor Projects
III, IV, V and Special Projects

SUBJECT: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Technical Specifications Change
Request - Generic Letter 88-06

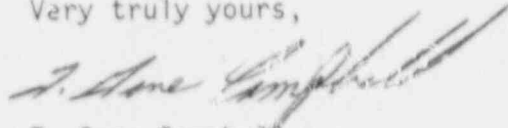
Dear Mr. Calvo:

Generic Letter 88-06 provided guidelines on deleting organizational charts from Technical Specifications. Based upon this guidance, AP&L is submitting the attached change to delete organizational charts from Section 6.0 of the ANO-2 Technical Specifications. The proposed Technical Specification changes reflect the title changes requested in our submittals of December 4, 1987 (2CAN128701) and April 14, 1988 (2CAN048808).

In accordance with 10 CFR 50.91(a)(1), AP&L has evaluated the proposed changes using the criteria in 10 CFR 50.72(c) and has determined that they involve no significant hazards consideration. The basis for this determination is attached.

In accordance with 10 CFR 170.12(c), a check in the amount of \$150.00 is hereby remitted as an application fee.

Very truly yours,


T. Gene Campbell

TGC:lg

Attachments

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PDR ADOCK 05000368
P DCE

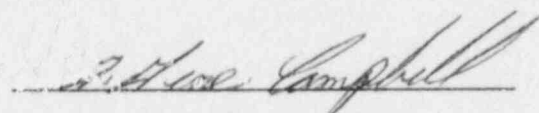
MEMBER MIDDLE SOUTH UTILITIES SYSTEM

*Accl w/ check
11 150
#06-8203*

STATE OF ARKANSAS)
COUNTY OF PULASKI)

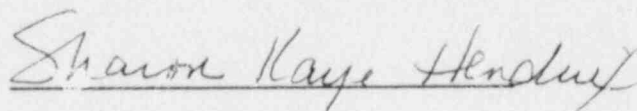
SS

I, T. Gene Campbell, being duly sworn, subscribe to and say that I am Vice-President of Nuclear Operations for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 20AN068807 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.



T. Gene Campbell

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 10th day of June, 1988.



Notary Public

My Commission Expires:

9-19-89

DESCRIPTION OF AMENDMENT REQUEST

The proposed change is requested based upon the guidance provided in Generic Letter 88-06, Removal of Organizational Charts from Technical Specification Administrative Control Requirements.

The planned change would remove Figures 6.2-1 and 6.2-2. These figures are organizational charts. The staff has found that only certain aspects of organizational charts are important to safety and not covered by other portions of the Technical Specifications. These are:

- (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.

This requirement will be met by the proposed Section 6.2.1.a. Organizational charts will be reflected in the QA Manual Operations, which is updated at least annually.

- (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.

This requirement will be met by proposed Section 6.2.1.c.

- (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.

This requirement will be met by proposed Section 6.2.1.b.

- (4) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license.

This requirement will be met by proposed section 6.2.2.h.

- (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.

This requirement will be met by proposed Section 6.2.1.d.

DETERMINATION OF SIGNIFICANT HAZARDS

Arkansas Power and Light Company has performed an analysis of the proposed change in accordance with 10 CFR 50.91(a)(1) regarding no significant hazards consideration using the standards in 10 CFR 50.92(c). A discussion of these standards as they relate to this amendment request follows:

Criterion 1: Does not involve a significant increase in the probability or consequences of an accident previously evaluated.

This proposed change does not involve an increase in the probability or consequences of an accident previously evaluated because the change is administrative in nature. The removal of the organizational charts will allow greater flexibility for AP&L to alter the nuclear organization. However, organizational changes must be evaluated per 10 CFR 50.54 and 10 CFR 50.59, due to the inclusion of organizational charts in both the QA Manual Operations and the Safety Analysis Report.

Criterion 2: Does not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated since the change does not alter the configuration or operation of the plant. The revised Technical Specifications still require a defined organization and the lines of authority must be documented.

Criterion 3: Does not involve a significant reduction in a margin of safety.

The proposed change would not involve a significant reduction in a margin of safety since it involves no change of any plant safety parameters or accident mitigation capabilities.

Therefore, AP&L has determined that the requested change does not involve a significant hazards consideration.