



OLIVER D. KINGSLEY, JR.  
Vice President  
Nuclear Operations

March 19, 1987

U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-29  
Proposed Amendment to the Operating  
License (PCOL-87/01) SERI  
Organization  
AECM-87/0062

System Energy Resources, Inc. (SERI) is requesting by this submittal, an amendment to License NPF-29, for Grand Gulf Nuclear Station Unit 1. This amendment includes changes to the Offsite Organization and to the Unit Organization.

The proposed organization changes were discussed informally with your staff on March 16, 1987 and are primarily administrative in nature. The changes to the Unit Organization are proposed in order to more equally distribute the workload between the Managers of Plant Support and Plant Operations, consolidate records and clerical functions, more accurately reflect the Security Supervisor's responsibilities, more accurately reflect the Training Superintendent and Site Controller responsibilities, and delete an unnecessary Technical Assistant position. The changes to the Offsite Organization are proposed to strengthen the licensing project management and administrative functions, provide a more effective management chain of command for Nuclear Plant Engineering support groups, place higher management emphasis on Emergency Planning and decrease emphasis on Unit 2 construction.

In accordance with the provisions of 10 CFR 50.30 and 50.4, the signed original of the requested amendment is enclosed and the appropriate copies will be distributed. The attachment provides the complete technical justification and discussion to support the requested amendment. This amendment has been reviewed and accepted by both the Plant Safety Review Committee (PSRC) and the Safety Review Committee (SRC).

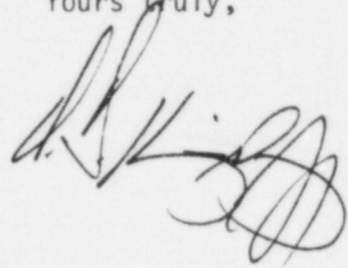
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Based on the guidelines presented in 10 CFR 50.92, it is the opinion of System Energy Resources, Inc. that this proposed amendment involves no significant hazards considerations.

In accordance with the requirements of 10 CFR 170.21, we have determined that the application fee is \$150.00. A remittance of \$150.00 is attached to this letter.

Yours truly,

A handwritten signature in dark ink, appearing to be "D. J. Nelson", written over the words "Yours truly,".

ODK:mb1

Attachments: GGNS PCOL-87/01

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

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

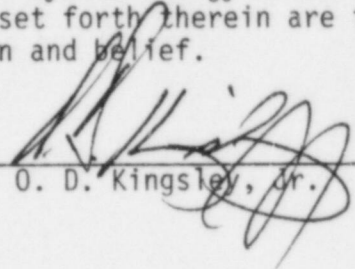
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LICENSE NO. NPF-29

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DOCKET NO. 50-416

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

\_\_\_\_\_  
AFFIRMATION

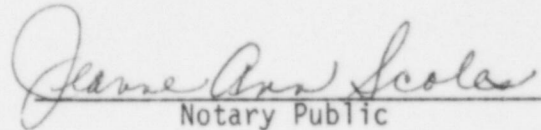
I, O. D. Kingsley, Jr., being duly sworn, stated that I am Vice President, Nuclear Operations of System Energy Resources, Inc.; that on behalf of System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by System Energy Resources, Inc. to sign and file with the 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 19th day of March, 1987.

(SEAL)

  
\_\_\_\_\_  
Notary Public

My commission expires:

My Commission Expires Sep. 21, 1987



NLS-87/03

SUBJECT: Technical Specification Figure 6.2.1-1, Offsite Organization, Figure 6.2.2-1, Unit Organization, and Section 6.5.2.2, Safety Review Committee Composition; pages 6-3, 6-4 and 6-9.

DISCUSSION: SERI plans to revise the Unit Organization and the Offsite Organization, as shown on the attached marked up Figures 6.2.1-1 and 6.2.2-1. The organization changes proposed in this submittal were discussed with members of your staff on March 16, 1987. SERI plans to implement these changes upon submittal of this letter. These organizational changes are proposed to accomplish the following goals:

Unit Organization

- o More equally distribute the workload between the Managers of Plant Support and Plant Operations.
- o Consolidate the plant industrial safety, chemistry and radiation control functions.
- o Consolidate records and clerical functions.
- o More accurately reflect the responsibilities assigned to the present Plant Security Supervisor position.
- o Have groups that perform tasks for the entire plant site report directly to the Site Director.
- o Delete unnecessary Technical Assistant position.

Offsite Organization

- o Strengthen the licensing project management function.
- o Strengthen the licensing project administrative function.
- o Provide a more effective management chain of command for Nuclear Plant Engineering support groups.
- o Elevate the Training and Site Controller groups to provide reporting requirements commensurate with their areas of responsibility.
- o Place greater management emphasis on Emergency Planning.
- o Revise supervisory title for construction to be commensurate with decreased construction activities.

The proposed changes to the Unit Organization chart, Figure 6.2.2-1, are as follows:

- 1) The Technical Support Group including the Technical Support Superintendent, Reactor Engineering Supervisor, Technical Engineering Supervisor and supporting personnel will report to the Manager, Plant Support instead of the Manager, Plant Operations.
- 2) The Industrial Safety Coordinator will report to the Chemistry/Radiation Control Superintendent instead of the Manager, Plant Operations.
- 3) The Office Services Superintendent, who presently reports to the Manager, Plant Support, will become the Office Services Supervisor reporting to the Support Systems Superintendent (presently designated the Records and Materials Superintendent).
- 4) The present Plant Security Supervisor will become the Plant Security Superintendent.
- 5) The Training Superintendent, who presently reports to the Manager, Plant Support, will report to the Site Director, GGNS.
- 6) The Accountant position presently reporting to the Manager, Plant Support will be replaced by the Site Controller position reporting to the Site Director, GGNS.
- 7) The Technical Assistant position presently reporting to the GGNS General Manager will be deleted.

The proposed changes to the Offsite Organization chart, Figure 6.2.1-1 and Section 6.5.2.2 are as follows:

- 1) Change the present position of Director, Nuclear Licensing and Safety to Director, Nuclear Licensing on Figure 6.2.1-1 and Section 6.5.2.2. Change the present position of Manager, Nuclear Safety and Compliance to Manager, Licensing Support on Figure 6.2.1-1.
- 2) Under the Director Nuclear Plant Engineering add the Manager, Nuclear Design and the Manager, Engineering Support.
- 3) Add the Training and Site Controller Groups reporting directly to the Site Director, GGNS.
- 4) Change the title of Manager, Unit 2 Construction to Unit 2 Construction Superintendent.

JUSTIFICATION: The proposed organizational changes will strengthen the GGNS Unit and Offsite Organizations. The changes will provide more efficient administration of plant, licensing and engineering functions. Proper chain of command functions are being specified to ensure proper management attention to designated areas of responsibility. Consolidation of areas that have similar responsibilities will create a more effective organizational structure. The addition of managers in the engineering organization will enhance the effectiveness of the individual engineering groups and relieve the Director of some of the management burden. The reorganization of the Nuclear Licensing Department will provide a more effective licensing project management function, a more centralized focus on communications with the NRC and stronger administrative function.

The changes to the Unit Organization chart, Figure 6.2.2-1, are justified as follows:

- 1) The Technical Support Superintendent is responsible for plant technical staff engineering functions. He is assisted in his duties by the Technical Engineering Supervisor and the Reactor Engineering Supervisor. The Technical Engineering Supervisor is responsible for engineering efforts and results to assure safe unit operation and plant availability and capacity improvements. The Reactor Engineering Supervisor is responsible for on-site core management and periodic reactor testing, in-plant nuclear materials control, and accountability, providing off-shift assistance to reactor operators during control rod pattern adjustments and the STA Program.

The Technical Support Superintendent presently reports directly to the Manager, Plant Operations. It is proposed to transfer the Technical Support Section from Plant Operations to report directly to the Manager, Plant Support. This transfer will allow the Manager, Plant Operations to concentrate his attention on daily operations and will more evenly distribute the workload between the Plant Operations and Plant Support sections. This transfer will improve management attention to Technical Support activities. The present responsibilities of the Technical Support Section will be moved intact with this proposed organization change. This change will not affect the Technical Support Superintendent's role on the PSRC, but will effectively balance membership between Plant Operations and Plant Support at three members each.



- 2) The present position of Industrial Safety Coordinator is responsible for the coordination of occupational safety and health at GGNS Unit 1 to ensure compliance with government, company and plant safety regulation.

This proposed change to Figure 6.2.2-1 is necessary to reflect that the Industrial Safety Coordinator will report directly to the Chemistry/Radiation Control Superintendent instead of to the Manager, Plant Operations. This change is being made to provide Superintendent management level involvement in industrial safety concerns. The inclusion of Industrial Safety in the Chemistry/Radiation Control department will serve to consolidate industrial, chemical and radiological safety concerns into one, more effective organization. This change will not reduce the effectiveness of the Industrial Safety Coordinator and his reporting chain of command will still fall under the Manager, Plant Operations.

- 3) The present Office Services Superintendent is responsible for providing various administrative services to the plant staff. He presently works closely with the Records and Materials Superintendent to ensure that other plant staff sections are responsive to the requirements of the Document Control and Records Management Program. The Office Services Superintendent presently reports directly to the Manager, Plant Support.

The proposed change to the organization will change the titles of Office Services Superintendent to Office Services Supervisor, and Records and Materials Superintendent to Support Systems Superintendent. The proposed Office Services Supervisor will report directly to the Support Systems Superintendent. This change will consolidate plant clerical functions and will increase management effectiveness in this administrative area. Since the present Office Services Superintendent works closely with the present Records and Materials Superintendent, this change will have minimal impact in the clerical area. The new position of Office Services Supervisor is not being shown on the Unit Organization chart, Figure 6.2.2-1. The position of Support Systems Superintendent being shown on the Unit Organization chart is sufficient to designate the office services area of responsibility.

- 4) The present position of Plant Security Supervisor is responsible for implementing the Plant Security Plan. He is assisted by a security force in the conduct of his duties and he reports directly to the Manager, Plant Support.

The title Supervisor of Plant Security is proposed to be upgraded to Superintendent of Plant Security without changing the job duties or responsibilities. This title change is being proposed to more accurately reflect the responsibilities assigned to the present Plant Security Supervisor position.

- 5) The Training Superintendent is responsible for implementing the GGNS Training Program outlined in FSAR Section 13.2. This includes scheduling training and retraining activities, directing and coordinating training instructor activities and transferring completed training records to Nuclear Records for storage as Quality Assurance records. The Training Section's responsibilities encompass more than just Plant Staff training and include training for the Unit-1 Projects and Plant Modification and Construction groups as well as the General Employee Training course, Radworker training for all departments for all employees and selected participation of non-plant employees in certain courses. As such, the Training Superintendent should report directly to the Site Director, GGNS to facilitate the proper chain of command for training activities.

This proposed organization change will place a higher level of direct management attention on training activities at the plant site. Present Training Section responsibilities will be retained with this organization change.

- 6) The present Plant Accountant is responsible for designing, developing, coordinating, implementing, maintaining and directing the plant cost control program. He keeps management advised of the current cost, the progress status and conformance to projected budget guidelines. The Plant Accountant's responsibilities encompass more than just Plant Staff activities and include cost control for the Unit-1 Projects and Plant Modification and Construction groups. The title Plant Accountant is proposed to be changed to Site Controller who will report directly to the Site Director, GGNS.

The Plant Accountant's present responsibilities will be retained by the Site Controller. This proposed organization change will institute the proper chain of command for the plant site cost control activities and will place a higher level of direct management attention on the Site Controller's group.



- 7) The present position of Technical Assistant to the GGNS General Manager is responsible for providing technical information and assistance on an as needed basis. The proposed change will delete this Technical Assistant position and delegate the associated responsibilities to the Managers of Plant Operation, Maintenance and Support. The position of Administrative Assistant to the GGNS General manager is not affected by this proposed change.

The changes to the Offsite Organization chart, Figure 6.2.1-1 and Section 6.5.2.2 are justified as follows:

- 1) The present Nuclear Licensing and Safety staff is the normal contact point for SERI with the NRC in all matters concerning licensing and is responsible for responding to all NRC bulletins and orders. This staff also provides administrative services to the corporate Safety Review Committee and the Vice President, Nuclear Operations. The present Director, Nuclear Licensing and Safety is supported in these efforts by the Manager, Nuclear Licensing and the Manager, Nuclear Safety and Compliance.

The present Nuclear Licensing Section has the primary responsibility for obtaining the operating licenses for the station and coordinating resources to respond to Nuclear Regulatory Commission requests for additional information. This includes maintenance, distribution, and revision of the UFSAR, Security Plan, and Fire Protection Plan; responses to NRC questions; applications for source and SNM licenses; licensing review of FSAR design changes; scheduling the submission of FSAR update revisions and other licensing documents; the responsibility of reviewing and commenting on communications from the Nuclear Regulatory Commission; interpreting provisions of the Atomic Energy Act, Code of Federal Regulations, and other documents as they apply to the station. The Nuclear Licensing Section is also responsible for preparation, maintenance, and implementation of the GGNS Emergency Plan and the licensing commitment tracking system.

The present Nuclear Safety and Compliance Section is responsible for nuclear safety and regulatory compliance aspects of the Safety and Licensing Section responsibilities. This includes evaluation, tracking, and resolution of generic licensing issues such as unresolved safety issues; ensuring the performance of needed safety analysis work which may be required for 10 CFR 50.59 reports; overseeing probabilistic risk analysis concerns; maintenance, revision, and control of plant Technical Specifications; evaluation, tracking, and, as needed,

resolution of specific safety concerns raised in Inspection and Enforcement Bulletins, Circulars, and related areas such as INPO/NSAC significant operating event and significant operating experience reports, as well as preparation of formal responses to the NRC where required; preparation of reports required by 10 CFR 50.59; and review of 10 CFR 21 and 50.55(e) reports prior to submittal to the NRC.

The present Nuclear Licensing and Safety Department will be renamed to the Nuclear Licensing Department and reorganized internally. The reorganized department will retain all the responsibilities of the previous Nuclear Licensing and Safety Department with the exception of the Emergency Planning area which will report to the Assistant to the Vice President, Nuclear Operations. Reporting to Director, Nuclear Licensing will be the Manager, Nuclear Licensing and the Manager, Licensing Support.

The Manager, Nuclear Licensing will have two supervisors reporting to him, the Supervisor, Licensing and the Supervisor, Licensing Projects. The Supervisor, Licensing is responsible for licensing strategy and day-to-day communications and interface with the NRC except for certain routine reporting functions as discussed below. The Supervisor, Licensing is responsible for, but not limited to, coordinating Technical Specification and Operating License changes/problems, answering generic letters, BWR Owner's Group activities, transient/accident analyses work, routine reports, interpretations for NRC Regulations and GGNS Licensing Basis, monitoring industry issues, supplying the SRC secretary, generic issues and reload licensing. The Supervisor, Licensing Projects is responsible for, but not limited to coordinating special projects, UFSAR Maintenance, 50.59 project activities, equipment qualification and coordinating NUREG 0737 Supplement 1 activities.

Generally speaking, the present Nuclear Safety and Compliance group will be disbanded with its safety and some compliance activities reassigned to either the Supervisor, Licensing or the Supervisor, Licensing Projects.

The Manager, Licensing Support will be responsible for selected reporting, internal Nuclear Licensing Department support activities, and office services for the Nuclear Licensing department. The Manager, Licensing Support will have reporting to him a Supervisor, Regulatory Reporting, a Lead Engineer, Support and an Office Services Assistant. The Supervisor, Regulatory Reporting is responsible for, but not limited to, processing Licensee Event Reports,

Notice of Violations and Notice of Deviations review of 10 CFR 21 concerns, I&E Bulletin tracking and specified routine reports. The Lead Engineer, Support is responsible for, but not limited to, commitment tracking, Nuclear Licensing Department procedures control, budget/accounting, training records, department goals/objectives, computer support and logistic support. The Office Services Assistant is responsible for secretarial and clerical support for the department.

The reorganization of the department will provide more centralized control of communications with the NRC. The day-to-day NRC communications will be the responsibility of the Manager, Nuclear Licensing as implemented by the Supervisor, Licensing. The reorganization will strengthen the licensing project management function by placing all major licensing functions under one Manager. Licensing business and administrative functions will be strengthened by centralizing them under one Manager.

Presently, the Emergency Planning Section reports to the Manager, Nuclear Licensing. The proposed reorganization of the present Nuclear Licensing and Safety Department will reassign the Emergency Planning Section to report to the Assistant to the Vice President, Nuclear Operations. This change provides higher level management awareness and attention to the activities of the Emergency Planning Section. This change also increases the independence of the section in carrying out its functions. Since the Emergency Planning Section is not presently shown on the Offsite Organization chart, Figure 6.2.1-1, there is no intent to add it at this time.

- 2) Nuclear Plant Engineering is presently organized with a Director and seven engineering support groups reporting directly to him. The proposed reorganization will add a Manager, Nuclear Design and a Manager, Engineering Support between the Director and six of the support groups. The Manager, Nuclear Design will be responsible for the Electrical Engineering, the Mechanical Engineering and the Civil/Structural Engineering groups. The Manager, Engineering Support will be responsible for the Quality Engineering, Systems Engineering and Engineering Services groups. The present Operational Analysis Group (ISEG) will remain independent and report directly to the Director, Nuclear Plant Engineering. This organization change will not change the responsibilities within the present engineering groups. The change will provide greater management attention and direction to the various groups.



- 3) The placement of the Training and Site Controller groups directly under the Site Director, GGNS is discussed and justification provided in paragraphs 5) and 6) in the Unit Organization changes. No further discussion is needed in this section.
- 4) The present position of Manager, Unit 2 Construction is directly responsible for all construction activities associated with GGNS Unit 2. Major construction activity on GGNS Unit 2 is currently suspended thus reducing the amount of work being performed under the direction of the Manager, Unit 2 Construction. This reduction in amount of work is reflected in the downgrading of the title Manager, Unit 2 Construction to Unit 2 Construction Superintendent.

#### SIGNIFICANT HAZARDS CONSIDERATION:

These changes are primarily administrative in nature. The individuals assigned to the newly created positions will meet the relevant qualification requirements specified in UFSAR Chapter 13.

The proposed change does not involve a significant hazards consideration because operation of Grand Gulf Unit 1 in accordance with this change would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change does not involve a change in plant hardware, plant operating procedures, or plant emergency procedures. The changes to the Unit Organization are administrative in nature in that they more equally distribute the workload between the Managers of Plant Support and Plant Operations, consolidate records and clerical functions, more accurately reflect the Security Supervisor's responsibilities, more accurately reflect the Training Superintendent and Site Controller responsibilities, and delete an unnecessary Technical Assistant position. The changes to the Offsite Organization are administrative in nature in that they strengthen the licensing project management and administrative functions, provide a more effective management chain of command for Nuclear Plant Engineering support groups, places higher management emphasis on Emergency Planning and decreases emphasis on Unit 2 construction. Neither the SRC nor the PSRC composition is changed by this reorganization and movement of one member from the Operations Group to the Support Group will result in three members from each group on the PSRC. The proposed change to the SRC Composition is only a change to the title of the position and represents no change to the membership of the body. Therefore, this change cannot increase the probability or consequences of an accident.

- (2) create the possibility of a new or different kind of accident from any previously analyzed. It has been determined that a new or different kind of accident will not be possible due to this change. This change is administrative in nature and requires individuals assigned to the newly created positions to meet qualifications specified in the FSAR.
- (3) involve a significant reduction in a margin of safety. No margins of safety are affected by the proposed change due to their administrative nature. Plant and offsite organization is strengthened, qualifications requirements for the newly created positions are retained and PSRC representation is not adversely affected by the proposed change.

Therefore, the proposed change involves no significant hazards consideration.