



ARKANSAS POWER & LIGHT COMPANY

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

December 4, 1987

T. GENE CAMPBELL
Vice President
Nuclear Operations

2CAN128701

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 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: Administrative Controls

Dear Mr. Calvo:

This letter submits for your review and approval proposed changes to the Administrative Controls section (Section 6) of the Technical Specifications for Arkansas Nuclear One - Unit 1. Proposed revisions reflect planned organizational changes superseding the proposed changes previously submitted as proposed change Number 5 of our letter dated December 12, 1986 (2CAN128601). In addition, responsibilities of the Plant Safety Committee (PSC) relative to procedure reviews are also modified by this request to increase the effectiveness of the PSC.

Although the circumstances of this proposed license amendment are not of an exigent or emergency nature, we do request your review and approval as quickly as possible since our current plans call for the reorganization to be completed by the first part of 1988.

In accordance with 10CFR50.91(a)(1), AP&L has evaluated the proposed changes using the criteria in 10CFR50.92(c) and has determined that said changes involve no significant hazards consideration. The bases for this determination and the revised Technical Specification pages are attached. Also in accordance with 10CFR50.91(b)(1), a copy of this amendment request and attachments has been sent to Ms. Greta Dicus, Director, Division of Radiation Control and Emergency Management, Arkansas Department of Health.

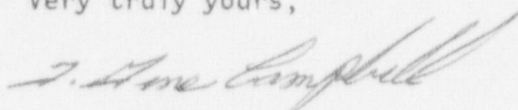
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PDR ADDCK 05000368
P PDR

Rec'd w/checked \$150.00

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A check in the amount of \$150 is included herewith as an application fee in accordance with 10CFR170.12(c).

Very truly yours,



T. Gene Campbell

TGC:DRH:lw

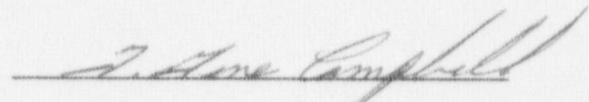
Attachments

cc w/att: Regional Administrator
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

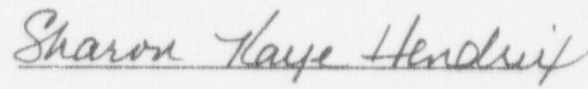
Ms. Greta Dicus, Director
Division of Radiation Control and
Emergency Management
Arkansas Department of Health
4815 West Markham Street
Little Rock, AR 72201

STATE OF ARKANSAS)
)
COUNTY OF PULASKI) SS

I, T. Gene Campbell, being duly sworn, subscribe to and say that I am Vice President, Nuclear Operations for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 2CAN128701 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 4th day of December, 1987.


Notary Public

My Commission Expires:

9-19-89

PROPOSED TECHNICAL SPECIFICATION CHANGES

LICENSE AMENDMENT REQUEST

IN THE MATTER OF AMENDING

LICENSE NO. NPF-6

ARKANSAS POWER & LIGHT COMPANY

ARKANSAS NUCLEAR ONE, UNIT 2

DOCKET NO. 50-368

DECEMBER 4, 1987

ARKANSAS POWER & LIGHT COMPANY

PROPOSED CHANGE NO. 1

Change Figures 6.1-1 and 6.2-2 to reflect a title change of the Senior Vice President of Energy Supply to Senior Vice President, Generation, Transmission and Engineering.

Change Sections 6.1.1, 6.4.1, 6.4.2, 6.5.1, 6.5.1.1, 6.5.1.2, 6.5.1.6, 6.5.1.7, 6.5.1.8, 6.8.3, 6.8.4 and to Figures 6.2-1 and 6.2-2 to reflect a title change of senior site management from Director, Site Nuclear Operations to Executive Director, ANO Site Operations.

Revise Section 6.5.1.2 to designate the PSC Chairman and membership in accordance with proposed organizational changes and to delete some specific job titles.

Change to Figures 6.2-1 and 6.2-2 to reflect planned organizational changes which will more closely integrate various nuclear support functions.

DISCUSSION

This proposed change results from a planned reorganization of AP&L's Nuclear Operations Department. The reorganization involves organizational restructuring at several levels including title changes.

The planned changes to the upper tier organization are reflected on Figure 6.2-1. The Senior Vice President, Energy Supply title was changed to the Senior Vice President, Generation, Transmission and Engineering. The Nuclear Operations organization continue to report to this position. Principal design engineering support for Nuclear Operations is currently provided via a design engineering department which provides support for all AP&L generation facilities. As revised, the design engineering function for support of nuclear operations will reside in a separate organization reporting directly to the Vice President, Nuclear Operations. Incorporation of nuclear related design engineering within Nuclear Operations will provide more effective and direct support.

The position of Nuclear Services General Manager, formerly reporting to the Vice President, Nuclear Operations, is not retained in the planned reorganization. The Nuclear Engineering and Licensing Department functions, formerly reporting to the Nuclear Services General Manager, will be separated with nuclear engineering related functions to be incorporated within design engineering. The licensing function will be consolidated with onsite licensing activities as discussed below. The remaining functions formerly assigned to the Nuclear Services General Manager have been incorporated into various line organizations or within the proposed Nuclear Oversight/Support Department.

The Nuclear Oversight/Support Department is a new department and reports directly to the Vice President, Nuclear Operations. The principal functions of this department will be to provide staff support for the Safety Review Committee (SRC) and to provide corporate management oversight of various line functions. Included within the new department will be the functions of the Corporate Health Physicist. This position was specifically discussed in AP&L's request for Technical Specification change dated October 8, 1981 (ØCAN108104) from William Cavanaugh, III to Robert A. Clark and J. F. Stolz. The "dotted line" responsibility of the Health Physics Superintendent to the Nuclear

Programs Manager currently shown on Figures 6.2-1 and 6.2-2 is deleted in the proposed change since the Nuclear Oversight/Support Department will provide similar oversight functions for this as well as a number of other line organizations.

The onsite organization shown on Figure 6.2-2 has also been revised. Two title changes are indicated. The Director, Site Nuclear Operations becomes Executive Director, ANO Site Operations. This position remains the senior onsite manager position. The current General Manager, Plant Operations becomes Plant Manager. This change more accurately reflects the scope of responsibility of this position.

Other changes to the onsite organization include the deletion of the position of Special Projects Manager, currently reporting to the Executive Director, ANO Site Operations. The onsite Licensing group, currently reporting to the Special Projects Manager, will be combined with the corporate Licensing group; and, the combined licensing function will now report directly to the Executive Director, ANO Site Operations. The consolidation of the licensing groups will allow closer coordination of AP&L's interface with NRC.

Other changes as indicated on Figure 6.2-2 include movement of the Plant Modifications Manager to report to the Plant Manager. This change allows the Plant Manager to better integrate modification activities with other day to day operations and maintenance activities. The Engineering Manager will now report directly to the Executive Director, ANO Site Operations, reflecting increased emphasis on engineering support for operation and maintenance activities. A new department, Nuclear Budgets and Long Term Planning, will also report to the Executive Director, ANO Site Operations. Portions of the sub-tier organizations within Maintenance, Engineering and Plant Support have been deleted to allow future minor organizational changes without the need for Technical Specification changes.

With the deletion of the Special Projects Manager position, Specification 6.5.1.2 has been revised to indicate the General Manager, Plant Support as the PSC chairman. In addition the Technical Analysis representative on the PSC has been deleted and a Licensing representative added. The Technical Analysis Section reports to the General Manager, Plant Support; and, therefore, the input presently provided by the Technical Analysis representative will continue to be available to the PSC. The Licensing representation was added to the PSC since the Special Projects Manager will no longer provide licensing input to the PSC. Specific titles were deleted in the proposed change in order to preclude the need for future Technical Specification changes which otherwise would be required due to minor title changes.

DETERMINATION OF SIGNIFICANT HAZARDS

Arkansas Power and Light Company has performed an analysis of the proposed change in accordance with 10CFR 50.91(a)(1) regarding no significant hazards consideration using the standards in 10CFR 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 and the proposed changes will enhance management control. The change reflects planned organizational changes which will improve the effectiveness of the organization by more closely integrating various support functions within AP&L's Nuclear Operations Department.

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 new organizational structure continues to provide and enhance the management and supervision of daily plant operations.

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, based on the reasoning presented above and the previous discussion of the amendment request, AP&L has determined that the requested change does not involve a significant hazards consideration.

PROPOSED CHANGE NO. 2

Revise Section 6.5.1.6 to modify the responsibilities of the Plant Safety Committee relative to procedure reviews.

Revise Section 6.8.2 to add an additional review requirement for procedures, reflecting recently implemented improvements in AP&L's procedure review process.

DISCUSSION

The current Technical Specifications require PSC review of all changes to those procedures required by Section 6.8.1. Since the original issuance of this Technical Specification, the number of such procedures have steadily increased. Continuing trends toward increased procedural detail, continuing efforts to improve procedure format, and numerous physical changes to plant equipment have increased the number of procedure changes requiring PSC review to approximately 1,000 per unit per year. This current volume of review which has included numerous non-significant changes as well as those of significance (i.e., changes requiring safety evaluations) was not anticipated during development of the original Specification.

In an effort to improve the procedure review process, AP&L initiated several changes in July of 1987. These included development of a specific training program to improve the effectiveness of reviews conducted per 10CFR50.59. Procedures were subsequently revised to require that each proposed procedure change be reviewed in accordance with 10CFR50.59 by an individual who had 1) completed the 10CFR50.59 training, 2) passed a written exam, 3) met minimum experience requirements, and 4) whose qualification had been reviewed and approved by the PSC or Safety Review Committee. The required review is a two step process. First, the review determines if a new procedure or procedure revision affects the Technical Specifications, FSAR or other licensing basis document. If these documents are affected, then a safety evaluation is prepared to determine if an unreviewed safety question may be involved. The continued PSC/SRC review of reviewer qualification will assure the continued effectiveness of the review process.

As proposed, Specification 6.8.2 will now formalize the current 10CFR50.59 review process and Specification 6.5.1.6 is revised to require PSC review of those procedures which required a safety evaluation per 10CFR50.59. These proposed changes will reduce the volume of procedure reviews currently conducted by PSC allowing more emphasis on the procedure change of more significance. In addition, PSC review of station administrative procedures provides for PSC oversight of the review process as well as other station administrative policies. Due to the specific reference to 10CFR50.59, the current requirement for PSC review of "tests and experiments" (Section 6.5.1.6.6) is redundant and is deleted.

DETERMINATION OF SIGNIFICANT HAZARDS

Arkansas Power and Light Company has performed an analysis of the proposed change in accordance with 10CFR50.91(a)(1) regarding no significant hazards consideration using the standards in 10CFR50.92(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.

Change to the procedure review process is designed to increase the effectiveness of PSC resources by reducing PSC review of non-significant changes to further focus on the more significant changes (i.e., those requiring a safety evaluation per the requirements of 10CFR50.59), and providing for performing 10CFR50.59 reviews and of station administrative procedures (i.e., overall administrative procedures applicable to all plant departments). Therefore, since the safety review responsibilities of the PSC will not be diminished, this change would not increase the probability or consequences of an accident previously evaluated.

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. As a result, the procedure review process continues to provide assurance that revisions to any procedure as described in the FSAR or changes from previously evaluated sequences of action are specifically evaluated per the requirements of 10CFR50.59.

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

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

Therefore, based on the reasoning presented above and the previous discussion of the amendment request, AP&L has determined that the requested change does not involve a significant hazards consideration.