



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. TO FACILITY OPERATING LICENSE NO. DPR-39
AND AMENDMENT NO. TO FACILITY OPERATING LICENSE NO. DPR-48
COMMONWEALTH EDISON COMPANY
ZION NUCLEAR POWER STATION, UNITS 1 AND 2
DOCKET NOS. 50-295 AND 50-304

1.0 INTRODUCTION

By letter dated February 22, 1989, as revised on March 22, 1989, Commonwealth Edison Company (the licensee) proposed changes to Administrative Controls Section of the Zion Technical Specifications. The proposed changes would remove the reference to the organization charts, and replace them with a narrative description of the offsite and onsite organizations functional requirements in TS 6.1.1. Guidance for these proposed changes to the Technical Specifications (TS) was provided to licensees and applicants by Generic Letter 88-06, dated March 22, 1988. In addition, the proposed changes would change several position titles, revise the reporting and responsibility requirements of new corporate officer titles to reflect a major company wide reorganization, correct some typographical errors, and make some editorial changes.

2.0 BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 6.2.1 and 6.2.2 of the administrative control requirements have referenced offsite and unit (onsite) organization charts that are provided as figures to these sections. On a plant specific basis, these organization charts have been provided by applicants and included in the TS issued with the operating license. Subsequent restructuring of either the offsite or unit organizations, following the issuance of an operating license, has required licensees to submit a license amendment for NRC approval to reflect the desired changes in these organizations. As a consequence, organizational changes have necessitated the need to request an amendment of the operating license.

Removal of organization charts is a line item improvement that was proposed on a lead-plant basis for the Shearon Harris plant and was endorsed by the Westinghouse Owners Group. This change was reviewed as part of the NRC's program for improvements in TS. The objectives of that program were established

by the Commission's Interim Policy Statement on Technical Specification Improvements. The staff concluded that removal of organization charts from TS will provide greater flexibility for licensees to implement changes in both the onsite and offsite organizational structure, consistent with Commission policy.

In addition to CEC's intent to delete organization charts, the licensee proposed to revise significant aspects of TS Section 6. This revision would reflect change in the CEC organization and update station and corporate position titles, description, responsibilities, and lines of authority. The purpose of the organization change was to improve communication channels and eliminate redundant levels of management.

3.0 EVALUATION

The licensee's proposed changes to its TS are in accordance with the guidance provided by Generic Letter 88-06 and addressed the items listed below.

- (1) Specification 6.1.2 was revised to delete the reference to organization charts in Commonwealth Edison Quality Assurance Manual.
- (2) Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.1.1, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activities; Section 6 Interdepartmental Relationships.
- (3) Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee has confirmed that this documentation currently exists in the Quality Assurance Manual or the Management Plan for Nuclear Operations.

On the basis of its review of the above items, the staff concludes that the licensee has provided an acceptable response to these items as addressed in the NRC guidance on removing organization charts from the administrative control requirements of the TS. Furthermore, the staff finds that these changes are consistent with the staff's generic finding on the acceptability of such changes as noted in Generic Letter 88-06.

In addition, the changes in on-site and off-site company position titles, responsibilities, and lines of authority identified throughout TS Section 6 were made to reflect a major CEC reorganization. Station and corporate positions affecting nuclear operations and management are being reorganized to enhance plant safety by improving channels of communication and authority in accordance with the recommendations made by the Introspect assessment. Finally, the licensee has proposed several editorial changes.

By letter dated March 22, 1989, the licensee provided additional clarifications by moving the phrase "or his designee" from Items b and c of TS 6.1.1 related to the responsibilities of the station manager and the Senior Vice President-Nuclear Operations. In addition, the licensee clarified that the station manager or his designee will report all finding of noncompliance with the NRC requirement, and provide recommendations to appropriate corporate officers. This submittal did not significantly change the original submittal and did not change the conclusion of no significant hazard consideration evaluation made by the licensee and the NRC staff.

The NRC staff concludes that the proposed TS amendments retain all portions of organizational characteristics which are important to safety, and the re-organizational changes should not adversely impact safe operation and management of the stations. The independence between operations and quality assurance is still maintained. The other changes are of editorial nature. Consequently, these amendments are acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the 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

The Commission made proposed determinations that the amendments involve no significant hazards consideration, which were published in the Federal Register (54 FR 10764) on March 15, 1989. The Commission consulted with the State of Illinois. No public comments were received, and the State of Illinois did not have any comments.

On the basis of the considerations discussed above, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: April 27, 1989