



Log # TXX-89616
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913.2

TUELECTRIC

August 30, 1989

William G. Council
Executive Vice President

U.S. Nuclear Regulatory Commission
Attn: Document Control Clerk
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCUMENT NOS. 50-445 AND 50-446
ADVANCE FSAR SUBMITTAL
ADDITIONAL CHANGES TO THE CPSES OPERATING ORGANIZATION
FSAR SECTION 13.1

REF: TU Electric letter to the NRC, TXX-89489
dated July 25, 1989

Gentlemen:

The attachment to this letter provides an advance submittal of FSAR changes to reflect the current CPSES operating and support organizations. The changes are substantially those provided in the referenced letter, with some minor modifications to reflect the latest organizational changes.

To facilitate NRC staff review of these changes, information related to this change (Attachment) is organized as follows:

1. A revised version of Section 13.1 (replacing applicable pages from the referenced letter) with changed portions for this submittal indicated by a bar in the margin (denoted as draft) as they are to appear in a future amendment.
2. Line by line description/justification of each FSAR item identified in item 4.
3. A marked-up version of the revised FSAR pages referenced by the description/justification for each identified item. The marked-up version facilitates review of the revisions by highlighting each change from the referenced letter to the proposed change.
4. Differences between the change proposed in the referenced letter and this advanced FSAR change submittal.

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PDR ADOCK 05000445
A PDC

400 North Olive Street LB 81 Dallas, Texas 75201

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TXX-89616
August 30, 1989
Page 2 of 2

TU Electric requests that the NRC perform an expedited review of the above FSAR change and inform us of its acceptability.

Sincerely,

William J. Cahill, Jr.

By: _____
Roger D. Walker
Manager, Nuclear Licensing

GLB/vld
Attachment

c - Mr. R. D. Martin, Region IV
Ms. M. Malloy
Resident Inspectors, CPSES (3)

Advance FSAR Change Related CPSES Operating and Support Organizations
and
Supporting Documentation

	Subject	Page
Item 1	Draft Revised Pages	2-9
Item 2	Description/Justification for FSAR change SA-89-609 (The balance of the description/justifications were provided with TXX-89489.)	10
Item 3	Applicable Marked-up Pages	11-18
Item 4	Differences Between Change Proposed in Referenced Letter and this Advanced FSAR Change	19-20

- Maintain the independence and credibility of the Program.	60
- Ensure adequate responses are provided to employees with concerns.	60
13.1.1.2.1 Organization - Nuclear Operations	62
<u>Vice President, Nuclear Operations</u> - The responsibilities of the Vice President, Nuclear Operations are:	60
- Ensure CPSES operation and maintenance activities are conducted in compliance with federal, state, and local laws, regulations, licenses, codes, and within established corporate and NEO policies, plans, and procedures.	62
- Provide direction and guidance to the Plant Manager; the Manager, Nuclear Training; the Manager of Nuclear Operations Support; the Plant Evaluation Manager; the Manager, Start-up; and the Manager, Projects.	DRAFT
- Ensures the safe and reliable operation of the plant and overall responsibility for security of the plant. The CPSES operating organization is discussed in Section 13.1.2 and illustrated in Figure 13.1-3. Organizations which support plant operations are discussed below.	DRAFT 62
<u>Plant Manager</u> - The responsibilities of the Plant Manager are:	DRAFT DRAFT
- Direct CPSES operation and maintenance activities in accordance with applicable federal, state, and local laws, regulations, licenses, codes and within established corporate and Nuclear Engineering and Operations policies, plans and procedures.	

Manager, Start-up - The Manager, Start-up reports to the Vice President, Nuclear Operations and is responsible for preoperational, acceptance and prerequisite testing.

DRAFT

DRAFT

13.1.1.2.2 Organization - Engineering and Construction

Senior Vice President - The responsibilities of the Senior Vice President are:

DRAFT

- Provide support to the NEO group in the design, specification, procurement, and review/evaluation of plant systems, apparatus, and materials associated with CPSES. 64
- Provide project and site construction management for backfit and betterment projects. 60
- Provide engineering design and drafting services for specifications and design documents. 60
- Provide for external construction personnel and services, as needed. 60
- Provide warehouse support services for CPSES. DRAFT
- Provide site facilities and support services for CPSES. 76
- Provide direction and guidance to the Vice President, Nuclear Operations; Chief Engineer; the Director of Construction; and the Director of Projects. DRAFT
- Direct management of CPSES engineering and construction contractors. 60

13.1.2.1.6 Chemistry & Environmental

DRAFT

The Chemistry & Environmental Manager is responsible for the supervision of chemistry personnel, for monitoring and maintaining the station's fluid systems chemistry and for implementing the station environmental monitoring program. In discharging these responsibilities, he ensures that his personnel are trained and that safety-related activities are conducted in accordance with applicable procedures, instructions, policies and regulations.

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13.1.2.1.7 Work Control

DRAFT

The Manager, Work Control is responsible for expediting the work process, identifying and correcting inefficiencies and assisting the maintenance organization in minimizing the work backlog.

DRAFT

13.1.2.2 Nuclear Operations Support Organization

DRAFT

The Manager of Nuclear Operations Support reports to the Vice President, Nuclear Operations and is responsible for managing the Nuclear Operations Support Organization. He is charged with the responsibility for technical support, plant support, emergency planning and testing.

DRAFT

13.1.2.2.1 Technical Support

DRAFT

The Manager, Technical Support is responsible for performing duties and providing support in the areas of system engineering, testing, design modification implementation, technical programs and compliance.

DRAFT

Also, this individual is responsible for development and maintenance of a preventative maintenance program. The Manager, Technical Support supervises a staff of engineers who are responsible

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DRAFT | for performing the various duties mentioned above. These engineers
62 | primarily have experience and training in the areas of electrical,
| nuclear, or mechanical engineering.

DRAFT | 13.1.2.2.2 Plant Support

DRAFT | The Manager, Plant Support is responsible for station security, safety
| services, and fire protection.

62 | Station Security

DRAFT | The Security Manager is responsible for the overall development and
| implementation of the security program at CPSES as outlined in Section
76 | 13.6 and the Security plans. Licensee security supervisors are
| responsible for security activities which implement the security
| program.

62 | Safety Services

62 | The Safety Services Manager is responsible for industrial safety and
| fire protection. The Fire Protection Supervisor reports to the
| Safety Services Manager and is responsible for the fire protection
| program and for the activities of the CPSES Fire Brigade.

DRAFT | 13.1.2.2.3 Performance and Test Department

DRAFT | The Performance and Test Manager is responsible for managing initial
| startup testing. The Performance and Test Manager is also

DRAFT | responsible for design modification acceptance tests, station
| performance tests, and those assigned station surveillance tests
| (typically the 18 month interval tests or integrated tests such as
| ILRT).

13.1.2.2.4 Emergency Planning

DRAFT

The Emergency Planning Manager is responsible for the development of the Emergency Plan and procedures, maintenance of emergency response facilities and equipment, and training of the emergency response organization. The Emergency Planning Manager is also responsible for interfacing with local, state and federal officials to ensure integrated onsite and offsite plans.

DRAFT

13.1.2.3 Supervisory Succession

DRAFT

The Plant Manager is responsible for the operation of CPSES. If the Plant Manager is absent or becomes incapacitated, then, unless otherwise designated, the following members of his staff assume his responsibilities in the order listed:

DRAFT

DRAFT

1. Manager, Operations
2. Manager, Maintenance

DRAFT

DRAFT

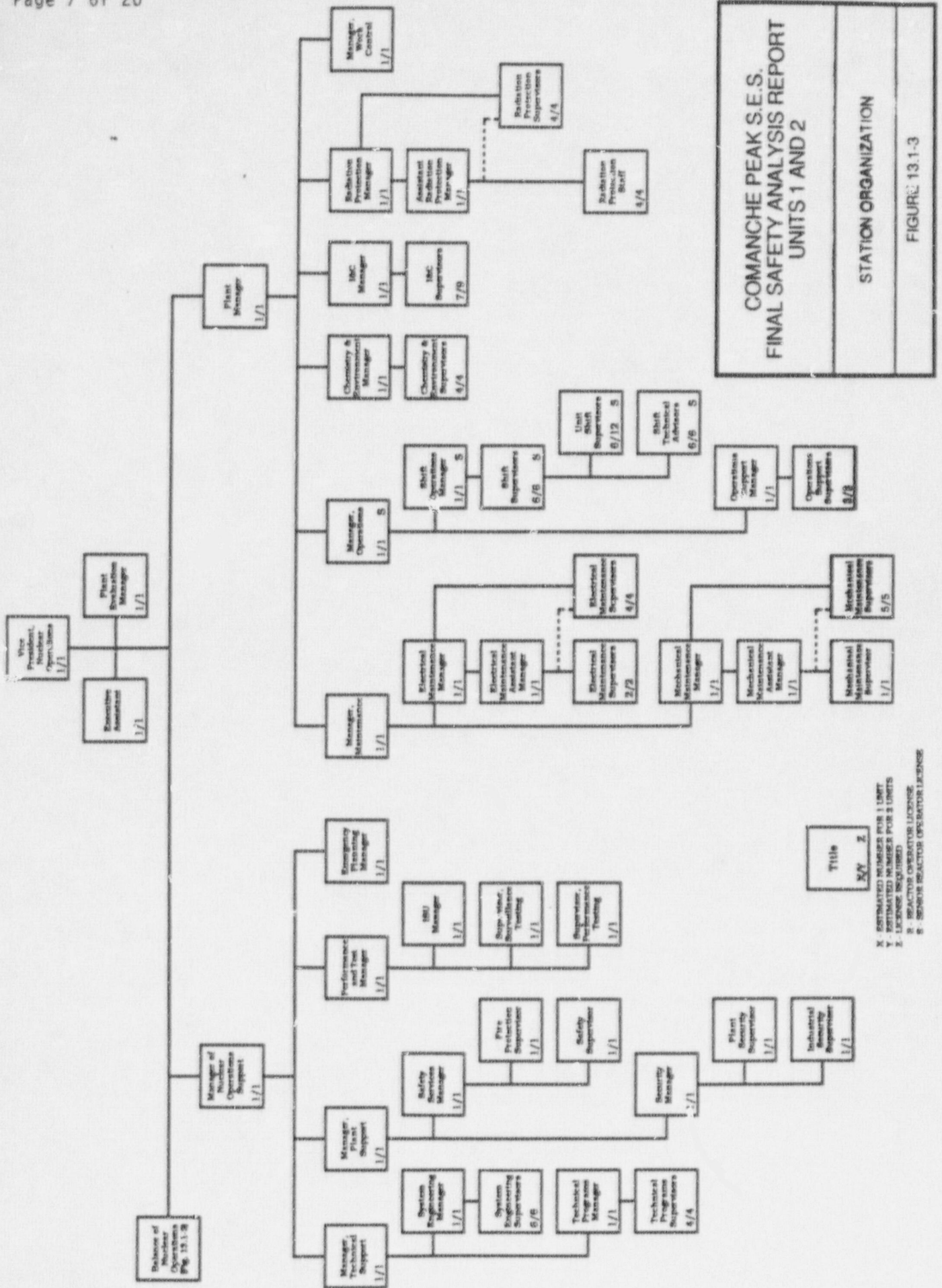
During back shift and weekend periods when the station staff is not on site, the Shift Supervisor is responsible for all activities at CPSES.

13.1.2.4 Shift Crew Composition

DRAFT

The minimum on-duty shift complement for various modes of single and dual unit operation is shown in Table 13.1-2 and is as follows:

A Shift Supervisor shall be onsite at all times when at least one unit is loaded with fuel.



COMANCHE PEAK S.E.S.
FINAL SAFETY ANALYSIS REPORT
UNITS 1 AND 2

STATION ORGANIZATION

FIGURE 13.1-3

X - ESTIMATED NUMBER FOR 1 UNIT
Y - ESTIMATED NUMBER FOR 2 UNITS
Z - LICENSE REQUIRED
S - REACTOR OPERATOR LICENSE
E - SENIOR REACTOR OPERATOR LICENSE

DRAFT	Resumes of the key TU Electric/CPSES personnel in the following order:
DRAFT	Larry G. Barnes Shift Operations Manager
DRAFT	John W. Beck Vice President, Nuclear Engineering
DRAFT	Michael R. Blevins Manager of Nuclear Operations Support
DRAFT	Dudley M. Bozeman Chemistry and Environmental Manager
DRAFT	H. D. Bruner Senior Vice President
DRAFT	William J. Cahill, Jr. Executive Vice President, Nuclear
DRAFT	Richard Daly, Jr. Manager, Startup
DRAFT	Doug L. Davis Manager, Technical Support
DRAFT	David E. Deviney Deputy Director, Quality Assurance
DRAFT	Joseph W. Donahue Manager, Operations
DRAFT	Stephen L. Ellis Performance and Test Manager
DRAFT	Joe B. George Vice President, Support
DRAFT	Phillip E. Halstead Manager, Quality Control
DRAFT	Chuck Hogg Chief Engineer
DRAFT	Ausaf Husain Director, Reactor Engineering
DRAFT	James J. Kelley, Jr. Plant Manager
DRAFT	John E. Krechting Director, Technical Interface
DRAFT	Bobby T. Lancaster Manager, Plant Support
DRAFT	G. Jay Laughlin Instrument and Controls Manager
DRAFT	Owen W. Lowe Director of Design Engineering and
DRAFT	Configuration Control
DRAFT	David R. Moore Manager, Work Control
DRAFT	James W. Muffett Manager of Engineering (CECO)
DRAFT	Robert J. Prince Assistant Radiation Protection
DRAFT	Manager
DRAFT	Michael J. Riggs Plant Evaluation Manager
DRAFT	Eric J. Schmitt Radiation Protection Manager
DRAFT	Austin B. Scott Vice President, Nuclear Operations
DRAFT	Peter B. Stevens Manager of Operations Support
DRAFT	Engineering Group

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| DRAFT

FSAR Page
(as amended)

Group Description

- | | | |
|---------------|---|---|
| 13.1-5, 7 | 4 | See Page No(s):19, 20, & 21
Update to CPSES operating organization pertaining to administrative support functions.
Revision:
Align FSAR with present CPSES operating organization and reflect recent organizational changes.
FSAR Change Request Number: 89-609
Related SER Section: 13.1; SSER6 13.1
SER/SSER Impact: No |
| Figure 13.1-3 | 4 | Update to CPSES operating organization pertaining to administrative support functions.
Revision:
Align FSAR with present CPSES operating organization and reflect recent organizational changes.
FSAR Change Request Number: 89-609
Related SER Section: 13.1; SSER6 13.1
SER/SSER Impact: No |
| 13.1A-1, 24 | 4 | Update to CPSES operating organization pertaining to administrative support functions.
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FSAR Change Request Number: 89-609
Related SER Section: 13.1; SSER6 13.1
SER/SSER Impact: No |

- Maintain the independence and credibility of the Program. | 60
- Ensure adequate responses are provided to employees with concerns. | 60

13.1.1.2.1 Organization - Nuclear Operations | 62

Vice President, Nuclear Operations - The responsibilities of the Vice President, Nuclear Operations are: | 60

- Ensure CPSES operation and maintenance activities are conducted in compliance with federal, state, and local laws, regulations, licenses, codes, and within established corporate and NEO policies, plans, and procedures. | 62

- Provide direction and guidance to the Plant Manager; ^{the Manager, Nuclear Training;} the Manager of Nuclear Operations Support; the Plant Evaluation Manager; the Manager, Projects; ~~and the Manager, Outage Planning.~~ | DRAFT

- Ensures the safe and reliable operation of the plant and overall responsibility for security of the plant. The CPSES operating organization is discussed in Section 13.1.2 and illustrated in Figure 13.1-3. Organizations which support plant operations are discussed below. | DRAFT

Plant Manager - The responsibilities of the Plant Manager are: | DRAFT

- Direct CPSES operation and maintenance activities in accordance with applicable federal, state, and local laws, regulations, licenses, codes and within established corporate and Nuclear Engineering and Operations policies, plans and procedures. | DRAFT

Manager, Start-up - The Manager, Start-up reports to the Vice President, Nuclear Operations and is responsible for preoperational, acceptance and prerequisite testing.

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DRAFT

13.1.1.2.2 Organization - Engineering and Construction

Senior Vice President - The responsibilities of the Senior Vice President are:

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- Provide support to the NEO group in the design, specification, procurement, and review/evaluation of plant systems, apparatus, and materials associated with CPSES.

64

- Provide project and site construction management for backfit and betterment projects.

60

- Provide engineering design and drafting services for specifications and design documents.

60

- Provide for external construction personnel and services, as needed.

60

- Provide site facilities and support services for CPSES.

76

- Provide direction and guidance to the Vice President, Nuclear Operations; Chief Engineer; the Director of Construction; and the Director of Projects.

DRAFT

- Direct management of CPSES engineering and construction contractors.

60

- Provide warehouse support services for CPSES.

DRAFT

13.1.2.1.6 Chemistry & Environmental

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The Chemistry & Environmental Manager is responsible for the supervision of chemistry personnel, for monitoring and maintaining the station's fluid systems chemistry and for implementing the station environmental monitoring program. In discharging these responsibilities, he ensures that all personnel are trained and that safety-related activities are conducted in accordance with applicable procedures, instructions, policies and regulations.

62

13.1.2.1.7 Work Control

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The Manager of Nuclear Operations Support reports to the Vice President, Nuclear Operations and is responsible for managing the Nuclear Operations Support Department. He is charged with the responsibility for technical support, plant support, ~~administrative~~ ~~support~~ and testing.

emergency planning

DRAFT

13.1.2.2.1 Technical Support

DRAFT

The Manager, Technical Support is responsible for performing duties and providing support in the areas of system engineering, testing, design modification implementation, technical programs and ~~regulatory~~ compliance. Also, this individual is responsible for development and maintenance of a preventative maintenance program. The Manager, Technical Support supervises a staff of engineers who are responsible

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DRAFT | for performing the various duties mentioned above. These engineers
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| nuclear, or mechanical engineering.

DRAFT | 13.1.2.2.2 Plant Support

DRAFT | The Manager, Plant Support is responsible for Station Security,
| Warehouse activities, safety services, and fire protection.

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| implementation of the security program at CPSES as outlined in Section
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DRAFT | The Performance and Test Manager is responsible for managing initial
| start-up testing. The Performance and Test Manager is also
DRAFT | responsible for modification acceptance tests, station
| performance tests and those assigned station surveillance tests
| (typically the 18 month interval tests or integrated tests such as
| ILRT).

Emergency Planning

DRAFT

The Emergency ^{Planning} Manager is responsible for the development of the Emergency Plan and

DRAFT

~~The Manager, Administrative Support is responsible for the development of the Emergency Plan and procedures, maintenance of emergency response facilities and equipment, and training of the emergency response organization. The Manager, Administrative Support is also responsible for interfacing with local, state and federal officials to ensure integrated onsite and offsite plans, providing information to the public about CPSES, and serving the document control needs of Nuclear Operations.~~

Emergency Planning

13.1.2.3 Supervisory Succession

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The Plant Manager is responsible for the operation of CPSES. If the Plant Manager is absent or becomes incapacitated, then, unless otherwise designated, the following members of his staff assume his responsibilities in the order listed:

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During back shift and weekend periods when the station staff is not on site, the Shift Supervisor is responsible for all activities at CPSES.

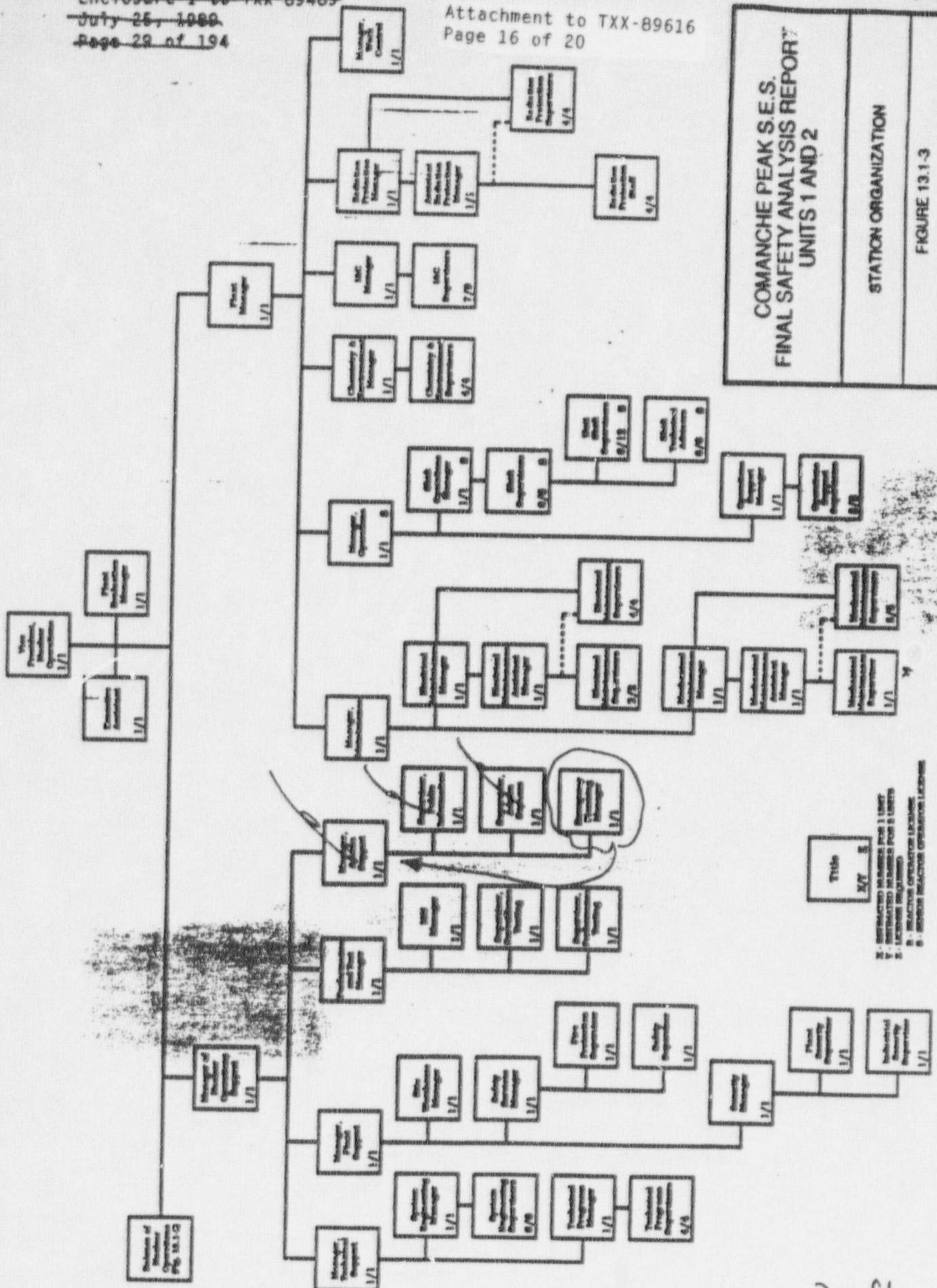
13.1.2.4 Shift Crew Composition

DRAFT

The minimum on-duty shift complement for various modes of single and dual unit operation is shown in Table 13.1-2 and is as follows:

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COMANCHE PEAK S.E.S.
 FINAL SAFETY ANALYSIS REPORT
 UNITS 1 AND 2
 STATION ORGANIZATION
 FIGURE 13.1-3



Draft
 from TXX-89489

DRAFT Page 31 of 61 1974 the key TU Electric/CPSES personnel in the following order:

DRAFT	Larry G. Barnes	Shift Operations Manager
DRAFT	John W. Beck	Vice President, Nuclear Engineering
DRAFT	Michael R. Blevins	Manager of Nuclear Operations Support
DRAFT	Dudley M. Bozeman	Chemistry and Environmental Manager
DRAFT	H. D. Bruner	Senior Vice President
DRAFT	William J. Cahill, Jr.	Executive Vice President, Nuclear
DRAFT	Richard Daly, Jr.	Manager, Startup
DRAFT	Doug L. Davis	Manager, Technical Support
DRAFT	David E. Deviney	Deputy Director, Quality Assurance
DRAFT	Joseph W. Donahue	Manager, Operations
DRAFT	Stephen L. Ellis	Performance and Test Manager
DRAFT	Joe B. George	Vice President, Support
DRAFT	Tommy L. Gosdin	Manager, Administrative Support
DRAFT	Phillip E. Halstead	Manager, Quality Control
DRAFT	Chuck Hogg	Chief Engineer
DRAFT	Ausaf Husain	Director, Reactor Engineering
DRAFT	James J. Kelley, Jr.	Plant Manager
DRAFT	John E. Krechting	Director, Technical Interface
DRAFT	Bobby T. Lancaster	Manager, Plant Support
DRAFT	G. Jay Laughlin	Instrument and Controls Manager
DRAFT	Owen W. Lowe	Director of Design Engineering and Configuration Control
DRAFT	David R. Moore	Manager, Work Control
DRAFT	James W. Muffett	Manager of Engineering (CECO)
DRAFT	Robert J. Prince	Assistant Radiation Protection Manager
DRAFT	Michael J. Riggs	Plant Evaluation Manager
DRAFT	Eric J. Schmitt	Radiation Protection Manager
DRAFT	Austin B. Scott	Vice President, Nuclear Operations
DRAFT	Peter B. Stevens	Manager of Operations Support Engineering Group
DRAFT		

<u>Tom L. Gosdin</u> - Manager, Administrative Support	62
Education:	49
BSAE - Texas A&M University - 1967	49
Experience:	49
1967 - Employed by Exxon USA in the Industrial Business Department, Marketing Technical Services.	49
1978 - Employed by TUGCO as CPSES Public Information Coordinator.	49
1984 - Assigned as Superintendent, Support Services at CPSES.	49
1987 - Assigned as Manager, Administrative Support at CPSES.	62
Activities:	49
Registered Professional Engineer in Texas.	49

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Differences Between FSAR Change Proposed in TXX-89489
and
This Advanced FSAR Change SA-89-609 (TXX-89616)

- Page 13.1-5 Proposed change: Section 13.1.1.2.1 - "Provide direction and guidance to the Plant Manager; the Manager, Nuclear Training; the Manager of Nuclear Operations Support; the Plant Evaluation Manager; the Manager, Start-up; and the Manager, Projects.
- Previous change (from TXX-89489): "Provide direction and guidance to the Plant Manager; the Manager of Nuclear Operations Support; the Plant Evaluation Manager; the Manager, Projects; and the Manager, Outage Planning.
- Page 13.1-7 Proposed change: Section 13.1.1.2.2 - "Provide warehouse support services for CPSES."
- Previous change (from TXX-89489): This function was not a previous responsibility of the Senior, Vice President. (See change on Page 13.1-20, below.)
- Page 13.1-19 Proposed Change: Section 13.1.2.2 - "The Manager of Nuclear Operations Support reports to the Vice President, Nuclear Operations and is responsible for managing the Nuclear Operations Support Department. He is charged with the responsibility for technical support, plant support, emergency planning, and testing."
- Previous change (from TXX-89489): "The Manager of Nuclear Operations Support reports to the Vice President, Nuclear Operations and is responsible for managing the Nuclear Operations Support Department. He is charged with the responsibility for technical support, plant support, administrative support, and testing."
- Proposed change: Section 13.1.2.2.1 - "The Manager, Technical Support is responsible for performing duties and providing support in the areas of system engineering,... and compliance..." [Word 'regulatory' deleted.]
- Previous change (from TXX-89489): "The Manager, Technical Support is responsible for performing duties and providing support in the areas of system engineering,... and regulatory compliance...."

Page 13.1-20

Proposed change: Section 13.2.2.2 - "The Manager, Plant Support is responsible for Station Security, safety services, and fire protection." [Delete 'warehouse activities.']

Previous change from TXX-89489: The Manager, Plant Support is responsible for Station Security, warehouse activities, safety services, and fire protection."

Page 13.1-21

Proposed change: Section 13.1.2.2.4 - "Emergency Planning"

"The Emergency Planning Manager is responsible for the development of the Emergency Plan and procedures, maintenance of emergency response facilities and equipment, and training of the emergency response organization. The Emergency Planning Manager is also responsible for interfacing with local, state and federal officials to ensure integrated onsite and offsite plans." [The Administrative Support functions have been reassigned within CPSES and the Manager, Administrative Support position has been deleted.]

Previous change from TXX-89489: "Administrative Support" The Manager, Administrative Support is responsible for the development of the Emergency Plan and procedures, maintenance of emergency response facilities and equipment, and training of the emergency response organization. The Manager, Administrative Support is also responsible for interfacing with local, state and federal officials to ensure integrated onsite and offsite plans, providing information to the public about CPSES, and serving the document control needs of Nuclear Operations.

Figure 13.1-3

Proposed change: This figure has been revised to reflect these previously discussed organization changes.

Page 13.1A-1

Proposed change: Delete the listing for Tommy L. Gosdin, Manager, Administrative Support.

Page 13.1A-24

Proposed change: Delete T. L. Gosdin's resume and leave a blank page in its place.