

From: Wiebe, Joel
Sent: Wednesday, December 30, 2020 12:00 PM
To: 'Lashley, Phil H'
Cc: Vaidya, Bhalchandra
Subject: Request for Additional Information Regarding License Amendment Request to Incorporate the Applicable Standard Technical Specification 5.2.2, "Unit Staff,"

REQUEST FOR ADDITIONAL INFORMATION
OFFICE OF NUCLEAR REACTOR REGULATION

Dockets:

05000334-PWR-Beaver Valley 1,
05000412-PWR-Beaver Valley 2,
05000346-PWR-Davis-Besse

EPID: L-2020-LLA-0169

Questions

Question Number: 132

10 CFR, Part 50.36(c)(5) requires, in part, that technical specifications include administrative controls, including provisions relating to organization and management necessary to assure operation of the facility in a safe manner.

10 CFR, Part 50.34(b)(6)(i), requires, in part, that operating license applications include information regarding the applicant's organizational structure, allocations or responsibilities and authorities, and personnel qualifications requirements.

NUREG-0800 (SRP), Chapter 13, Section 13.1.2-13.1.3, provides regulatory guidance for considerations regarding the structure, functions, and responsibilities of the onsite organization established to safely operate and maintain the facility. This guidance calls for applicants to provide a description of the qualification requirements established for filling each management position category in the operating organization. This guidance also calls for applicants to provide organizational information in an organization chart/table containing the title of each position in the operating organization and indicating the positions for which reactor operator and senior reactor operator licenses are required.

NRC-developed Standard Technical Specification (STS) 5.2.2.d for Westinghouse and Babcock and Wilcox nuclear power facilities (NUREG-1430 and NUREG-1431 respectively) include a standard requirement that either the operations manager or assistant operations manager shall hold an SRO license.

In Section 3.0 of the licensee amendment request (LAR), the licensee proposes the use of the term "operations middle manager" in lieu of the term "assistant operations manager," as listed in the STS. The LAR states that the intention of this alternative language is to make the requirement more generic. However, there is no information included in the submittal regarding which position(s) can be considered to fill the role of "middle manager" within the operations department.

Without additional context, the proposed specification language could be subject to interpretation such that a manager at an inappropriate low level could be considered a "middle manager." (For example, a shift manager, who oversees supervisors and reports to the operations manager, could be considered a "middle" manager.) Under such an interpretation, circumstances within the the operations department could be permitted where neither the operations manager nor the assistant operations manager (or the site-specific equivalent) would be required to hold an SRO license. Such circumstances would be contrary to the intent of the guidance within the applicable STS.

Provide clarification or additional details (such as a position description or an organization chart/table with appropriate indication) regarding how "middle manager" will be defined for the purposes of fulfilling the proposed revised technical specification. Include how the licensee will provide reasonable assurance that an individual at the appropriate level of department management will hold an SRO license, in accordance with the intent of the STS.

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