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ACCESSION NBR: 8805180357 DOC. DATE: 88/05/10 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
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 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Augmented application for amend to License NPF-21, deleting organization charts & including proposed generic ltr text.

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Washington Public Power Supply System

3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

May 10, 1988

G02-88-112

Docket No. 50-397

U. S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21, REQUEST FOR AMENDMENT TO
TECHNICAL SPECIFICATIONS - ADMINISTRATIVE CONTROLS,
SECTION 6 - SUPPLEMENTAL INFORMATION

Reference: 1. Letter G02-87-140, G. C. Sorensen (SS) to NRC, same
subject, dated April 21, 1987
2. Generic Letter 88-06, "Removal of Organization Charts
from Technical Specification Administrative Control
Requirements," dated March 22, 1988

Reference 1 requested amendment to organizational charts and text of Section 6 of the WNP-2 Technical Specifications to reflect administrative changes. Reference 2 promoted and provided guidance for the removal of organizational charts from the Technical Specifications and the addition of text to Sections 6.2.1 and 6.2.2 to capture the essential aspects of the removed organization charts. In light of the request presently before the staff and the guidance of the Generic Letter, the Supply System hereby requests that Reference 1 be augmented (as attached) to delete the organization charts and include the proposed Generic Letter text (as applicable to WNP-2). Additionally, due to recent changes in the Quality Assurance organization, the change requested in Reference 1 (page 6-8) from QA to QA/QC manager is hereby withdrawn. No change of support to WNP-2 is represented in this withdrawn request but rather a reflection of increased management attention to and separation of the QA/QC functions. Furthermore, page 6-1, Section 6.2.2.e identifies the Shift Supervisor as not a member of the Fire Brigade. For purposes of clarity, the position should be identified as the Shift Manager. Again, no change of support is represented by this change but only an administrative change for clarification.

With incorporation of this supplemental information, the Supply System's commitment to maintaining a management structure that contributes to and governs the safe operation and maintenance of WNP-2 is not diminished. This change provides greater flexibility towards ensuring that the above commitment is maintained. 10 CFR 50.36c(5) specifies the contents of the administrative controls section of the technical specifications and removal of the organization charts does not contravene guidance therein. Equivalent organization charts currently exist and will be maintained in Chapter 13 of the WNP-2 FSAR and per 10 CFR 50.71 changes will be reported annually with the update of the FSAR.

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS -
ADMINISTRATIVE CONTROLS, SECTION 6 - SUPPLEMENTAL INFORMATION

The Supply System has evaluated the augmented material per 10 CFR 50.92 and provides the following in support of a finding for no significant hazards consideration.

- 1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because no physical modification of the plant or equipment is involved. Removal of the organization charts does not alter compliance of the WNP-2 Technical Specifications to 10 CFR 50.36. The added text ensures that the essential aspects for responsibility, authority and communication with regard to safe operation of the plant remain clear and evident. The organization charts will continue to be maintained in the WNP-2 FSAR with changes reviewed per 10 CFR 50.59 and reported through annual updates as required by 10 CFR 50.71. Therefore, for the above reasons, the probability or consequences of accidents previously evaluated will not be adversely affected.
- 2) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because as discussed, no physical changes to the plant or equipment are involved and the added text ensures the responsibility, authority, and communication for safe plant operation are not changed and remain clear and evident. Hence, no possibility for a new or different kind of accident from any previously evaluated is represented in the proposed change.
- 3) The proposed changes do not involve a significant reduction in a margin of safety because the revision in no way alters the Supply System's commitment to maintaining a management structure that contributes to the safe operation and maintenance of WNP-2. The added text ensures clarity of responsibility, authority, and communication remains in the Technical Specifications. Since no physical change to the plant or equipment is involved and responsibility for safety is not diminished, no significant reduction in a margin of safety is presented in this change.

As discussed above, the Supply System considers that this augmented information does not represent a significant hazards consideration, nor is there a potential for any effluents that may be released offsite, nor does it involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and therefore, per 10 CFR 51.22(b), an environmental assessment of the change is not required.

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS -
ADMINISTRATIVE CONTROLS, SECTION 6 - SUPPLEMENTAL INFORMATION

This augmented information has been reviewed and approved by the WNP-2 Plant Operation Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB).

Although submitted as supplemental information to Reference 1, an application fee per 10 CFR 170.21 of one hundred fifty dollars (\$150.00) accompanies this request. In accordance with 10 CFR 50.91, the State of Washington has been provided a copy of this letter.

Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

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Attachments

cc: C Eschels - EFSEC
JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA
NRC Site Inspector - 901A

