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 AUTH. NAME: SORENSEN, G.C. AUTHOR AFFILIATION: Washington Public Power Supply System  
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License NPF-21, changing Tech Spec 6.2.2.f to allow plant operations manager to not maintain senior reactor operator qualification so efforts could be focused toward effective plant operation.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

January 23, 1991  
G02-91-013

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 SPECIFICATION 6.2.2.f (UNIT  
STAFF/SRO REQUIREMENT)

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90, and 2.101, the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications. Specifically, the Supply System is requesting that the subject section be modified as attached to allow the Plant Operations Manager to not maintain a Senior Reactor Operator (SRO) qualification so that his efforts towards effective plant operation are not diminished by efforts to maintain the SRO license.

A recent review of the WNP-2 Technical Specification section 6.3 "Unit Staff Qualifications" has indicated that the SRO license requirement of section 6.2.2.f may be inconsistent with the requirements of section 6.3 with respect to the qualification of the Plant Operations Manager. Section 6.3 states that "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS N18.1-1971 for comparable positions, except for the Health Physics/ Chemistry Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1-R, May 1977". ANSI/ANS N18.1-1971 paragraph 4.2.2 states that "At the time of initial core loading or appointment to the active position the operations manager shall hold a Senior Reactor Operator's License". Section 6.2.2.f appears to require a current SRO license. The ANSI Standard does not require that the SRO license be current; only that it be current at the time of assuming the position.

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REQUEST FOR AMENDMENT TO TECHNICAL  
SPECIFICATION 6.2.2.f (UNIT STAFF/SRO REQUIREMENT)

Requiring that the SRO license be current at all times may potentially detract from the Operations Manager's effectiveness at fulfilling his responsibilities towards effectively managing the Operations organization. The amount of effort needed to prepare for the SRO examination occupies a significant portion of an individual's time in both achieving and maintaining the SRO license. Coupling this effort with the responsibilities of managing the Operations organization is excessive. As a result, during this time the potential exists to allow these requalification efforts to consume his attention to the detriment of other activities. A further conflict of interest is created by the qualification process. As Plant Operations Manager one of his responsibilities is assessing the adequacy of the unit staff qualification and training program. Being a trainee in the program restricts his access to the program and narrows his focus when assessing the program. While the Supply System concurs with the requirement that the SRO license be current at the time of assuming the position of Plant Operations Manager, the effort required for continual maintenance of the SRO license may potentially be detrimental to the effective operation of the Operations organization.

The change to specification 6.2.2.f also provides the option to allow the Plant Operations Manager to be the designated Operations Management person who is required to maintain an SRO license, since the proposed change allows either the Plant Operations Manager or the Assistant Plant Operations Manager to maintain an SRO license. Under normal circumstances, the Assistant Operations Manager will maintain the SRO license. At times, the Plant Operations Manager may need to maintain an SRO license (e.g., the Assistant Plant Operations Manager is promoted to Plant Operations Manager and the new Assistant Plant Operations Manager does not have an SRO license). In these cases where the Assistant Plant Operations Manager does not have an SRO license, the Plant Operations Manager will be responsible for maintaining an SRO license.

The change to 6.2.2.f is appropriate since an individual who has an SRO license is on the Plant Operations Management staff. The Plant Operations Manager will still meet the ANSI/ANS standard for having a Senior Reactor Operator license at the time of assuming the position. As such, the change is considered administrative in nature. Temporary absences are routinely addressed by plant correspondence designating responsibility for a specified duration.

The change relieves the Plant Operations Manager of a burden that could potentially distract him from the effective management of the Operations organization. This will have a beneficial impact on the operations of the plant because the Operations Manager will be able to concentrate his attention on the overall conduct of operations rather than expend effort in keeping current an SRO license that has minimal contribution towards the conduct of his position.

The change also allows flexibility in the succession to the Plant Operations Manager position in that either the Plant Operations Manager or the Assistant Plant Operations Manager must have an active SRO license. This allows the Assistant to be promoted without immediately requiring a licensed individual to fill the vacated position.

REQUEST FOR AMENDMENT TO TECHNICAL  
SPECIFICATION 6.2.2.f (UNIT STAFF/SRO REQUIREMENT)

The Supply System has evaluated this amendment per 10CFR 50.92 and determined that it does not represent a significant hazard because it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated since the change is administrative in nature. Additionally, the day-to-day conduct of operations will not be impacted. This change will enhance the operation of the plant because the potential for the Operations Manager's attention to be diverted by an intense effort to maintain an SRO qualification that has little significant contribution towards his overall responsibilities will be eliminated. He will be more able to devote his efforts towards the effective operation of the plant. As such, this change does not represent a significant increase in the probability or consequences of an accident previously evaluated.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because operation of the plant remains unaffected. This administrative change introduces no new modes of operation of any equipment. Nor does it require physical modification to the plant. No decrease in the attention to plant operations is represented by this change. To the contrary the Plant Operations Manager will be more able to concentrate his attention on the operation of the plant. Therefore this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.
- 3) Involve a significant reduction in a margin of safety. This change is administrative in nature, therefore no reduction in a margin of safety is involved. Additionally, as discussed above, the Operations Manager will be able to concentrate his attention on the operation of the plant rather than being potentially distracted by the efforts of maintaining the SRO license. Compliance to technical specification section 6.3 and ANSI/ANS N18.1-1971 is still in effect. As a result no margin of safety is affected and the overall management of the unit staff is enhanced.

As discussed above, the Supply System considers that this change does not involve a significant hazards consideration, nor is there a potential for significant change in the types or significant increase in the amount of 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 10CFR 51.22(c)(9) and therefore, per 10CFR 51.22(B), an environmental assessment of the change is not required.

Page Four

REQUEST FOR AMENDMENT TO TECHNICAL  
SPECIFICATION 6.2.2.F (UNIT STAFF/SRO REQUIREMENT)

This amendment request has been reviewed and approved by the WNP-2 Plant Operations Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB). In accordance with 10CFR 50.91 the State of Washington has been provided a copy of this letter.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

PLP  
Attachments

cc: JB Martin - NRC RV  
NS Reynolds - Winston & Strawn  
PL Eng - NRC  
DL Williams - BPA/399  
NRC Site Inspector - 901A  
RG Waldo - EFSEC


STATE OF WASHINGTON)

COUNTY OF BENTON )

Subject: SRO REQUIREMENT

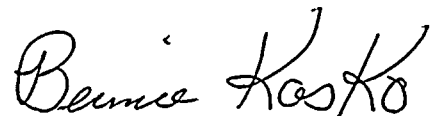
I, G. D. BOUCHEY, being duly sworn, subscribe to and say that I am the Director, Licensing and Assurance, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE: 1/23/91, 1991

  
G. D. Bouchey, Director  
Licensing and Assurance

On this date personally appeared before me G. D. BOUCHEY, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 23 day of January 1991.

  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Kennelworth, WA

My Commission Expires 4/28/94



