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SUBJECT: Provides supplementary info in support of 910123 request for  
 amend to License NPF-21, revising TS 6.2.2.f.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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November 29, 1991  
G02-91-218

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), SUPPLEMENTARY INFORMATION

Reference: Letter, G02-91-013, GC Sorensen (SS) to NRC, same subject, dated  
January 23, 1991

The referenced letter recognized that a requirement that the Operations Manager hold a current Senior Reactor Operators License (SRO) could detract from his capabilities to meet all the requirements of his position. Further it identified a possible inconsistency between Technical Specification sections 6.3 and 6.2.2.f. Technical Specification section 6.3 "Unit Staff Qualifications" 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.

The Technical Specification change proposed by the referenced letter replaced the first sentence of Technical Specification 6.2.2.f with:

"The Shift Managers and Control Room Supervisors shall hold a senior reactor operator license. In addition, the Operations Manager or the Assistant Operations Manager shall also hold a senior reactor operator license."

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

The intent of this change being that the Assistant Operations Manager would be the primary individual to hold the SRO at the Operations Manager and Assistant Operations Manager level and the flexibility of stating that the Operations Manager might also hold an SRO would allow for periods of transition such as promotions.

Subsequent to submittal of the change request the Supply System has recognized the need to provide additional information to fully support the referenced letter.

Accordingly, the following supplementary information is provided in support of the referenced letter. Operations at WNP-2 are such that an Assistant Operations Manager is responsible to the Operations Manager for the "immediate supervision" of the Unit Staff. The Assistant Operations Manager at WNP-2 maintains an SRO license. This position is currently described in the WNP-2 FSAR as follows, however a change is being made to the FSAR (underlined section) to clarify the responsibilities of the Assistant Plant Operations Manager (page 13.1 - 7, WNP-2 FSAR Amendment No. 42).

"The Assistant Plant Operations Manager supports and assists the Operations Manager in the performance of these duties. He is responsible to the Plant Operations Manager for the immediate supervision of the Unit Staff. As such, he receives direction from the Plant Operations Manager for the day-to-day routine and supervises implementation. He normally maintains a current Senior Reactor Operators License (SRO). During periods of transition such as promotion the individual with a current SRO, either the Operations Manager or the Assistant Operations Manager will have the responsibility for immediate supervision of the unit staff. In either case the individual with the SRO may only be relieved by another individual possessing a current SRO. The Assistant Plant Operations Manager assumes total responsibility for the Operations Manager's duties during periods of time when the Operations Manager is temporarily absent from the plant."

With addition of this change to the FSAR the proposed change to 6.2.2.f is appropriate since an individual with an SRO license remains responsible for the immediate supervision of the Unit Staff at all times. The change to specification 6.2.2.f will still allow the Plant Operations Manager to be the designated Operations Management person who is required to maintain an SRO license, since the proposed change requires either the Plant Operations Manager or the Assistant Plant Operations Manager to maintain an SRO license. Under normal circumstances, only the Assistant Operations Manager will maintain the SRO license. During unusual or transient circumstances (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), the Plant Operations Manager may need to maintain an SRO license. During these circumstances where the Assistant Plant Operations Manager does not have an SRO license, the Plant Operations Manager will be responsible for the immediate supervision of the Unit Staff. This ensures that the Unit Staff is being directly supervised by an individual with an SRO license.



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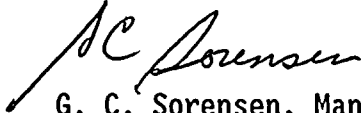
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REQUEST FOR AMENDMENT TO TECHNICAL  
SPECIFICATION 6.2.2.f (UNIT STAFF/SRO REQUIREMENT)

The Supply System has reviewed this supplementary information with respect to the 10CFR 50.92 significant hazards and 10CFR 51.22(B) environmental assessment exclusion findings provided in the referenced letter and has determined that those findings are not affected by this supplementary information and remain appropriate for the requested change.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

PLP/bk

cc: JB Martin - NRC RV  
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