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 AUTH.NAME AUTHOR AFFILIATION
 SORESENSEN,G.C. Washington Public Power Supply System
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards amend to license NPF-21,consisting of proposed change, revising TS 6.0, requesting that composition of Plant Operations Committee be changed, to allow implementation of Staff reorganization intended to be reponsive to plant.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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November 25, 1992
G02-92-258

Docket No. 50-397

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

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 6.0,
ADMINISTRATIVE CONTROLS

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. This proposal requests that the composition of the Plant Operations Committee (POC) be changed, as attached, to allow the implementation of a Staff reorganization intended to be more responsive to plant issues and events. Specifically the Assistant Plant Manager position is being replaced with direct reports to the Plant Manager, as described below, being established as responsible for the various divisions of station operation. With this change the composition of the Plant Operations Committee (POC) is affected and an additional member, the Engineering Services Division Manager, is proposed for membership. Additionally titles for both the Director of Licensing and Assurance and Nuclear Safety Assurance Group (NSAG) are being changed to Director of Quality Assurance and Nuclear Safety Assurance Division (NSAD).

The Plant Staff reorganization replaces the Assistant Plant Manager with direct report responsibilities to the Plant Manager (with new title designations) as follows:

Operations Division Manager replaces the Operations Manager,
Technical Services Division Manager replaces the Technical Manager,
Maintenance Division Manager replaces the Maintenance Manager, and the
Radiation Protection Manager replaces the Health Physics/Chemistry Manager.

Titles for the Administrative Manager and the Plant Quality Assurance Manager are not changed by this reorganization. With this reorganization the Operations Division Manager will have reporting to him those individuals previously responsible for plant chemistry recommendations and monitoring. The POC composition description has been changed to 1) reflect these new titles, and 2) add the Engineering Services Division Manager to the membership.

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The change in the Operations Organization places an Operations Division Manager reporting to the Plant Manager for overall Operations, Chemistry, Outage Management, and Work Control activities. The responsibilities of the Operations Manager and Assistant Operations Manager for all plant operations; the day-to-day routine as well as the abnormal or emergency operating situations remains unchanged. Technical Specification requirement 6.2.1.f requiring that either the Operations or Assistant Operations Manager hold a senior reactor operator license also remains unchanged. The creation of the Operations Division Manager position allows the Operations Manager and Assistant Operations Manager to focus more on the immediate concerns of plant operations while the Operations Division Manager oversees the broader range of activities.

The changes in title for several POC members; Technical Services Division Manager, Maintenance Division Manager and Radiation Protection Manager reflect the reorganization. The same philosophy as described above for the Operations Division Manager applies for the Technical Services Division Manager and Maintenance Division Manager. These positions will be responsible for the broader range of activities within their division while managers reporting to them focus on specific activities within the Division. The Radiation Protection Manager, without the responsibility for Chemistry concerns, can now concentrate more effectively on Radiation Protection Activities. These changes are administrative and do not represent a decrease in capability of the member(s) to adequately fulfill their POC responsibilities. No decrease in technical competence is represented by this change.

The addition of the Engineering Services Division Manager to POC provides a plant design, design bases and modification perspective to the membership. In light of POC review responsibilities (section 6.5.1.6) this addition to the membership provides POC a more comprehensive, overall station review capability.

The only change having significance is the manner of appointing a POC Vice Chairman. Previously the Assistant Plant Manager was designated by the Technical Specifications as the Vice Chairman. As proposed, the Plant Manager will designate the Vice Chairman from the membership and have it so documented in the POC minutes. This will allow more flexibility in forming a quorum while at the same time preserving the technical adequacy of POC. Because of the minimum number of members (4) needed to constitute a quorum, the use of a member as Vice Chairman will require another POC member to be present. Thus the technical range and capability of POC will be preserved. The increased number of members participating will bring more specialized interests and review capabilities to POC than those brought previously when the Vice Chairman had a Plant Manager's perspective. POC reporting requirements to the Plant Manager are not changed by this method of designating a Vice Chairman. The Plant Manager will continue to be advised by POC as specified in Technical Specification 6.5.1.7.

The change in title for NSAG to Nuclear Safety Assurance Division (NSAD) is also strictly administrative and does not decrease the capability of the organization to meet the requirements of the group as described in Technical Specification 6.2.3.

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The change in title for the Director of Licensing and Assurance to the Director of Quality Assurance is a result of a recent change to more focus the Quality Assurance organization on issues affecting quality. This change removed the responsibility for Licensing so that the Quality Assurance Directorate could concentrate on matters affecting quality and not be potentially distracted by Licensing issues. The Licensing function has been relocated to the Engineering Directorate.

With respect to the proposed Technical Specification changes to the POC composition as a result of 1) the replacement of the Assistant Plant Manager, 2) the addition of the Engineering Services Division Manager, and 3) the method of appointing a Vice Chairman, the Supply System has evaluated these changes per 10 CFR 50.92 and determined that they do not represent a significant hazards consideration because they do not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The changes are administrative in nature and involve no physical alteration of the plant or changes to setpoints or operating parameters. For these reasons the response of the plant to previously evaluated accidents is not affected and no significant increase in the probability or consequences of an accident previously evaluated is credible as a result of these changes.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. Because no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, these changes do 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. The changes are due to a change in organization which does not decrease the competence of the members of the Plant Operations Committee. The same technical level of Plant Management Staff is still required to constitute a quorum. The same reporting responsibilities to the Plant Manager, Corporate Nuclear Safety Review Board and Assistant Managing Director for Operations are maintained. With the addition of the Engineering Services Division Manager the membership of POC is expanded to cover more completely all aspects of station operation. For these reasons the proposed changes in POC composition do not affect the capability of POC to meet POC responsibilities and do not involve a significant reduction in a margin of safety.

The Supply System has evaluated the title changes for the Director Licensing and Assurance and Nuclear Safety Assurance Group to Director Quality Assurance and Nuclear Safety Assurance Division with respect to 10 CFR 50.92 and determined that they do not represent a significant hazards consideration because they do not:

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- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. Again, these changes are administrative in nature and involve no physical alteration of the plant or changes to setpoints or operating parameters. For these reasons the response of the plant to previously evaluated accidents is not affected and no significant increase in the probability or consequences of an accident previously evaluated is credible as a result of these changes.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. Again, because no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, these changes do 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. The changes are due to changes in organization which do not decrease the competence of either the Director Licensing and Assurance or the Nuclear Safety Assurance Group. The change for the Director Licensing and Assurance is an enhancement to the Quality organization in that it allows a more concentrated focus on quality. The Licensing function has been moved to the Engineering Directorate. No change in technical capability or responsibilities is represented by this move. The Licensing function remains the same but reports to the Director of Engineering. The change in title for NSAG to NSAD is strictly administrative and does not affect the capability of the group to meet the requirements of Technical Specification 6.2.3. Hence, for these reasons the proposed changes in titles do not affect the capability of either the Director Quality Assurance or the Nuclear Safety Assurance Division to meet their responsibilities and do not involve a significant reduction in a margin of safety.

The Supply System has evaluated the move of the Plant Chemistry group into the Operations Division with respect to 10 CFR 50.92 and determined that this change does not represent a significant hazards consideration because the change does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. Again, the change is administrative in nature and involves no physical alteration of the plant or changes to setpoints or operating parameters. For this reason the response of the plant to previously evaluated accidents is not affected and no significant increase in the probability or consequences of an accident previously evaluated is credible as a result of this change.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. Again, because no change is being made to the design, operation, maintenance, or testing of the plant, a new mode of failure is not created. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.



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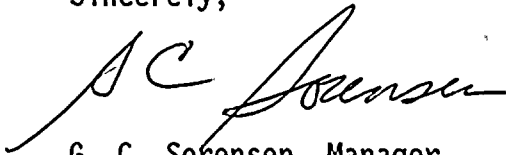
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- 3) Involve a significant reduction in a margin of safety. The move of the plant chemistry organization into the Operations Division does not involve a significant reduction in a margin of safety because no changes are being made to the responsibilities of the group. The group functions remain unchanged. Therefore with no change in function or responsibility this change also does not represent a significant reduction in a margin of safety.

As discussed above, the Supply System concludes that these changes do not involve a significant hazards consideration, nor is there a potential for a significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does the change involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet 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 these changes is not required.

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

Sincerely,



G. C. Sorensen, Manager
Regulatory Programs (Mail Drop 280)

PLP/bk

Attachments


cc: W Bishop - EFSEC
JB Martin - NRC RV
NS Reynolds - Winston & Strawn
J Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

**Subject: Request for Amend to TS
Administrative Controls**

DATE 25 NOVEMBER, 1992

On this date personally appeared before me G. SORENSEN, 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 25 day of November 1992.


Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994

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