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SUBJECT: Application for amend to License NPF-21, changing provisions
in TS Section 6.2.3, "Nuclear Safety Assurance Div" &
Section 6.5.1, "Plant Operations Committee" to reflect
realignment of QA Directorate.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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May 10, 1993
G02-93-107

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 provisions in Section 6.2.3, NUCLEAR SAFETY ASSURANCE DIVISION (NSAD) and Section 6.5.1, PLANT OPERATIONS COMMITTEE (POC) be changed, as attached, to allow the implementation of a staff reorganization intended to be more effective in identifying opportunities for performance improvement. Specifically the Quality Assurance Directorate is being realigned to accomplish this objective.

Currently, the Quality Assurance Directorate has three Division Managers reporting to the Director, Quality Assurance. These three Divisions are the Nuclear Safety Assurance Division, Operational Assurance Programs Division and the Programs and Audits Division. Under the proposed realignment, the Quality Assurance Directorate will be comprised of two Divisions: Quality Assessments and Quality Support. The proposed realignment will focus all of the current independent oversight functions performed by the Nuclear Safety Assurance Division, Operational Assurance Programs Division and Programs & Audits Division into one Division (Quality Assessments). The Quality Support Division will include the Operating Experience Review (OER) staff and the Operating Experience Analysis and Resolutions, Plant Quality Control and Procurement Quality Assurance Departments as they are currently constituted.

The OER staff within Nuclear Safety Assurance examines unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information which may indicate areas for improving safety of WNP-2. Detailed recommendations for revised procedures, equipment, modifications, maintenance

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**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
6.0, ADMINISTRATIVE CONTROLS**

activities, operations activities, and other similar activities are made by this organization. Under the proposed realignment, all of these functions will continue to be performed by the OER staff reporting directly to the Quality Support Division Manager.

The Nuclear Safety Engineering staff within Nuclear Safety Assurance also perform assessments of WNP-2 activities to provide independent verification that activities important to WNP-2 safety are performed correctly and human errors are reduced as much as practical. After the proposed realignment, these assessment functions will be accomplished within the Quality Assessments Division.

As stated above, the Quality Assessments Division will encompass the assessment functions formerly performed by the Nuclear Safety Assurance staff, the Operational Assurance Programs staff and the Programs and Audits staff. These organizations have become more performance-based in their reviews. Utilizing a functional area approach, all members of the Quality Assessments Division will be responsible for verifying through field observations, interviews and procedure and document reviews, the safe and efficient operation of WNP-2. As an integral part of this activity, all personnel will be expected to recommend enhancements, including procedure changes, which will assist in improving WNP-2 operations. Consolidation of the assessment staff will assist in increasing resources for more in-depth coverage and improved coordination of reviews.

Our review of the impacts of the proposed changes has also included consideration of any negative aspects. In our view, there is a small potential negative aspect that involves the distribution of Section 6.2.3 functions throughout the Directorate rather than maintaining it focused within the Nuclear Safety Assurance Division. The Nuclear Safety Assurance Division (NSAD) is currently chartered, among other functions, with ensuring and improving overall nuclear safety of WNP-2. The alignment being proposed will retain all of the NSAD functions within the Quality Support Division except for safety verification functions which move to the Quality Assessments Division. As stated above, verification of safety has been an important part of the current responsibilities of our oversight organizations. This will continue with the new alignment within the Quality Assessments Division and is not considered a negative impact. Management practices will be implemented to assure that the NSAD functions are performed by a composite of staff members that is at least the equivalent of the present NSAD. No other potential negative aspects of this proposed realignment are believed to exist.

A change to Section 6.5.1.2 of the Technical Specifications is being proposed to change the membership of POC from the Plant QA Manager to the Manager, Quality Assessments. This is an administrative change associated with the change in position titles for the proposed realignment.

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In summary, all of the functions currently being performed by the Nuclear Safety Assurance Division to satisfy the requirements of Section 6.2.3 of the Technical Specifications will continue to be accomplished within the Quality Assurance Directorate. With respect to the proposed Section 6.2.3 and Section 6.5.1.2 Technical Specification changes, the Supply System has reviewed these changes per 10CFR50.92 and has 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. Also, the Independent Safety Engineering Group (ISEG) functions will be accomplished by staff of the same or better qualifications. Therefore, the probability of an accident precursor failing to be recognized; the plant response to accidents, and therefore consequences of previously reviewed accidents; and, the ability of discovering a poor plant response to an accident will be unchanged or enhanced with this proposed, new alignment. The change in substituting the Manager, Quality Assessments for the Plant QA Manager as a member of POC is an administrative change. For these reasons, there will be no significant increase in the probability or consequences of an accident previously evaluated 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 proposed changes are administrative changes which do not decrease the competence of staff within the Quality Assurance Directorate. The functions previously provided by the Nuclear Safety Assurance Division to meet the Technical Specification Section 6.2.3 requirements and the guidelines of NUREG-0737 will continue to be provided within the Quality Assurance Directorate. The potential negative impacts are considered to be minimal and do not involve a significant reduction in a margin of safety.

The change in substituting the Manager, Quality Assessments for the Plant QA Manager as a member of POC is an administrative change and also does not involve a significant reduction in a margin of safety.

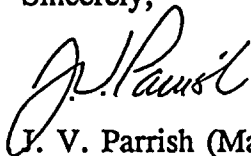
**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
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As discussed above, the Supply System concludes that these changes do not involve a significant hazards consideration, nor is there a potential for a significant change in the types or significant 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 10CFR51.22(c)(9) and therefore, per 10CFR51.22(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 10CFR50.91, the State of Washington has been provided a copy of this letter.

Conclusion of the review and issuance of the amendment would be appreciated by July 1, 1993, so that full implementation of the QA Directorate proposed realignment may be implemented at that time.

Sincerely,



J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations

Attachments

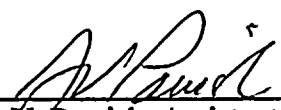
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NS Reynolds, Winston & Strawn
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STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Request for Amend to TS 6.0
Administrative Controls

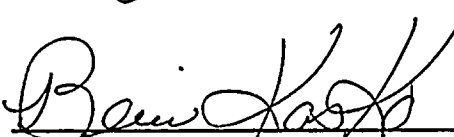
I, J. V. PARRISH, being duly sworn, subscribe to and say that I am the Assistant Managing Director, Operations for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE 10 May, 1993


J. V. Parrish, Assistant Managing Director
Operations

On this date personally appeared before me J. V. PARRISH, 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 10 day of May, 1993.


Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994

