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SUBJECT: Application for amend to License NPF-21,changing TS 6.0, "Adminstrative Controls" to clearly assign corporate responsibility for overall plant nuclear safety,including review & audit functions.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

June 2, 1993
G02-93-131

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: CNSRB

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 responsibilities of the Corporate Nuclear Safety Review Board (CNSRB) as described in Specifications 6.5.2.1, 6.5.2.8.i, and 6.5.2.9 be changed to be consistent with the corporate responsibilities for nuclear safety as described in Technical Specification 6.2.1.c. Specification 6.2.1.c identifies the Assistant Managing Director for Operations (AMDO) as having "corporate responsibility for overall plant nuclear safety...." The CNSRB activities as presently described in Technical Specifications 6.5.2.1, 6.5.2.8.i, and 6.5.2.9 specify reporting to, and taking direction from, the Managing Director. The corporate manager having responsibility for overall plant nuclear safety should be the manager giving direction to and receiving reports of activities from the CNSRB. Accordingly, changes to Specifications 6.5.2.1, 6.5.2.8.i, and 6.5.2.9 are requested (see attached) to appropriately align these activities in accordance with 6.2.1.c.

These changes are requested so that the AMDO is clearly assigned corporate responsibility for overall plant nuclear safety, including review and audit functions. The CNSRB brings an important element of expertise to, and detachment from, plant operations. As such the board should be responsible to and take direction from the corporate officer designated as responsible for overall corporate nuclear safety. Accordingly the changes requested to 6.5.2.1, 6.5.2.8.i, and 6.5.2.9 are intended to clarify the use of the CNSRB.

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In reviewing the origins of the specifications stating that the Managing Director should be the individual providing direction to, and receiving reports from, the CNSRB it was recognized that at the time of issuance of the original Technical Specifications the AMDO position did not exist. Hence, it was logical to assign these duties to the Managing Director as he was the individual having corporate responsibility for overall nuclear safety at that time. Subsequently, amendment 63 to the Technical Specifications approved designation of the new position and title for the Assistant Managing Director for Operations as the individual having corporate responsibility for overall plant nuclear safety. The CNSRB relationship to the AMDO was not established at that time.

A potentially negative aspect of this change is that the Managing Director is one level of management removed from the CNSRB. However the members of the CNSRB will remain as appointees by the Managing Director per Specification 6.5.2.2 and the reporting responsibility of the AMDO to the Managing Director will ensure that the Managing Director remains cognizant of overall nuclear safety concerns. The same reporting responsibility will also allow the Managing Director to have input to the direction of the CNSRB. For these reasons this potentially negative aspect is considered to have little impact on the overall level of nuclear safety at WNP-2.

The Supply System has reviewed the changes in CNSRB reporting responsibility and direction assignment 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. Again, the changes are administrative in nature and involve no physical alteration of the plant or changes to setpoints or operating parameters. The responsibilities and composition of the CNSRB remain the same. The direction to be provided to the CNSRB will come from the corporate officer designated as responsible for overall corporate nuclear safety and as such will have the potential for being more focused on important issues of nuclear safety. Hence, the oversight review and audit responsibilities of the CNSRB for nuclear safety are not affected by this change. Therefore the probability or consequences of previously reviewed accidents is not affected by 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 proposed changes are administrative changes which do not decrease the competence of the CNSRB. The co-operation and responsibilities of the CNSRB are not changed by this request. Because the [illegible] will come from the [illegible] officer designated as responsible for overall [illegible]

[illegible]

[illegible]

3) Involve a significant reduction in a margin of safety. The proposed changes are administrative changes which do not decrease the competence of the CNSRB. The composition and responsibilities of the CNSRB are not changed by this request. Because the direction will come from the corporate officer designated as responsible for overall nuclear safety the effectiveness of the CNSRB has a potential for being better focused. For these reasons the margin of safety created by the review and audit functions of the CNSRB is not diminished by this change.

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.

Sincerely,

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

Attachments

cc: W Bishop, EFSEC
JW Clifford, NRC
BH Faulkenberry, NRC RV
DL Williams, BPA/399
NRC Site Inspector, 901A
NS Reynolds, Winston & Strawn

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_____, 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 28th day of May 1993.

Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires August 9, 1995