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SUBJECT: Application for amend to license NPF-21, revising TS Section 6.0, "Administrative Controls," including changing reporting relationship for QA functions in section 6.2.1.e of TS from Managing Director to Assistant Managing Director, Operations.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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February 17, 1994  
G02-94-044

Docket No. 50-397

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

Subject: **WNP-2 OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS  
SECTION 6.0 ADMINISTRATIVE CONTROLS**

Reference: Letter dated September 8, 1993, J.W. Clifford (NRC) to J.V. Parrish (Supply System), "Issuance of Amendment for the Washington Public Power Supply System Nuclear Project No. 2 (TAC No. M86686)"

In accordance with the Code of Federal Regulations, Title 10 Parts 50.90 and 2.101, the Supply System hereby requests an amendment of section 6.0 of the WNP-2 Technical Specifications. The amendment is administrative in nature and does not affect plant equipment or operations. The amendment is being proposed as part of a recent management initiative to strengthen and improve the WNP-2 organization. The improvements include a consolidation of duplicate activities and a realignment of all nuclear responsibilities to the chief nuclear officer (Assistant Managing Director, Operations). This amendment is necessary to modify the terminology used in section 6.0 of the Technical Specifications to conform with the organizational improvements. The organizational changes will be implemented immediately following approval of this request.

This amendment request involves changes to the following Technical Specifications. First, this proposal requests that the reporting relationship for the quality assurance functions described in section 6.2.1.e of the Technical Specifications be changed from the Managing Director to the Assistant Managing Director, Operations (AMDO). This will allow all nuclear-related functions to be consolidated under the chief nuclear officer (AMDO) consistent with section 6.2.1.c of the Technical Specifications. This change will not affect the independence of the Quality Assurance oversight function since the Quality Assurance organization will be reporting to an individual who has been assigned all nuclear responsibility by the Managing Director.

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Moreover, the effectiveness of the AMDO will be enhanced with the additional resources of the Quality Assurance organization. The AMDO will be able to direct Quality Assurance to areas of emerging quality concerns based on the AMDO's knowledge of ongoing plant activities. The proposed organizational change is also consistent with many other nuclear utilities. A recent survey found that seventeen of twenty utilities with a single nuclear plant station and eleven of fourteen utilities with a single twin-unit nuclear station have Quality Assurance reporting to a chief nuclear officer.

Second, this proposal requests changes to sections 6.8.1.k and 6.8.2 of the Technical Specifications to clarify the transfer of the Health Physics/Chemistry Support Program activities from the Support Services Division to other organizations. The proposed changes permit an organizational realignment to consolidate activities and allow them to be governed, where appropriate, by plant procedures. The activities previously conducted under the Health Physics/Chemistry Support program will remain unchanged, but will now be conducted in the Radiation Protection Department at the plant or under the direct supervision of the Corporate Radiological Health Officer. In the new configuration, the establishment and approval of program procedures will be performed by the Plant Operations Committee and the Plant Manager as described in section 6.8.1 and 6.8.2 of the Technical Specifications. The attached mark-up of the affected Technical Specification page 6-14 shows the relocation of the Health Physics/Chemistry Support function by the deletion of section 6.8.1.k. No additional requirement for written procedures has been specified since the health physics and chemistry areas are covered under section 6.8.1.a and described in Regulatory Guide 1.33. Since this change will place these functions under the direct control of plant line management, no decrease in capability will occur.

Third, this proposal requests changes of two position titles for the Plant Operations Committee (POC) membership specified in section 6.5.1.2 of the Technical Specifications. The title "Administrative Manager" is being changed to "Administration and Records Management Manager" to reflect the combining of these functions under a single manager. The Plant Administrative Department is being moved from the Technical Services Division at the Plant and combined with the Records Management Division from the Information Services Directorate. This new organization will be assigned to the Support Services Division which reports to the AMDO. These changes provide the Administration and Records Management Manager with broad control over the administration and records related to our nuclear operations.

The second title change in section 6.5.1.2 of the Technical Specifications replaces the title "Plant QA Manager" with "Quality Assessments Division Manager." This management position has been expanded in responsibility and renamed. The Quality Assessments Division Manager has the combined responsibility for the Audit and Technical Assessment functions as well as the



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Quality Control and QA Surveillance activities previously performed by the Plant QA Manager. This change is necessary to more accurately reflect the title of the Quality Assurance designee to the POC. It will result in an individual assigned to POC with greater management responsibilities than the previous designee.

Last, this proposal requests that section 6.5.2.2 of the Technical Specifications be changed to clarify the number of members required for the Corporate Nuclear Safety Review Board (CNSRB). The present number of nine would be modified to read "at least nine" to clarify that additional members may be seated on the CNSRB. The proposed change also redirects the appointment authority from the Managing Director to the AMDO. The CNSRB currently reports to the AMDO (see section 6.5.2.1) and this change would bring the authority for appointments into alignment with the overall functional responsibility. The requirement to designate an Executive Secretary from the membership would be deleted so that all CNSRB members can focus their attention on the responsibilities of the CNSRB. The function of the Executive Secretary will be retained and continued, however, by a non-member under the direction of the Chairman.

Independent of the Technical Specification changes identified above, the planned reorganization also responds to an NRC concern expressed in the referenced Safety Evaluation for Amendment 118. Amendment 118, in part, changed the Technical Specifications to make the Corporate Nuclear Safety Review Board (CNSRB) responsible to the AMDO. The NRC noted in its safety evaluation that the AMDO did not have line responsibility for the Engineering organization and may not have sufficient authority to ensure that CNSRB findings are addressed. This realignment assures that the AMDO has the authority to take any measures needed to ensure acceptable staff performance and assigns the reporting responsibility for the Engineering Directorate to the AMDO.

The Supply System has evaluated the change in reporting relationship for the Quality Assurance Directorate with respect to 10 CFR 50.92 and determined that it involves no significant hazards consideration because operation of WNP-2 in accordance with the proposed amendment does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The reporting relationship of the Quality Assurance organization will be changed from the Managing Director to the AMDO. Since the AMDO has been assigned all nuclear responsibility by the Managing Director, the change will not diminish the capability of the Quality Assurance organization to carry out its independent audit and oversight role. The change is administrative in nature and involves no physical alteration of the plant or changes to either setpoints or operating parameters. Based on the foregoing, the probability or consequences of previously reviewed accidents is not affected by these changes.





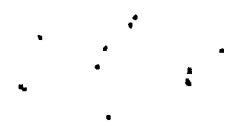
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- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The changes are administrative in nature and involve no changes to the design, operation, maintenance, or testing of the plant. Therefore, the proposed changes do not create new failure modes and 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 reporting relationship of the Quality Assurance organization will be changed from the Managing Director to the AMDO. The AMDO has been assigned all nuclear responsibility and authority by the Managing Director. Consequently, this change in reporting relationship will not diminish the capability of the Quality Assurance organization to carry out its independent audit and oversight role. With no change in capability of the audit function, this change does not represent a significant reduction in a margin of safety.

The Supply System has evaluated, with respect to 10 CFR 50.92, the transfer of the Health Physics/Chemistry Support Program from the Support Services Division to other organizations. The Supply System has determined that the transfer involves no significant hazards consideration because operation of WNP-2 in accordance with the proposed amendment does 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 changes to the plant or changes to either setpoints or operating parameters. 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. The changes are administrative in nature and involve no changes to the design, operation, maintenance, or testing of the plant. Therefore, the proposed changes do not create new failure modes, and 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 transfer of the Health Physics/Chemistry Support Program from the Support Services Division to other organizations does not decrease the technical expertise of individuals performing these functions. Consequently, the change will not affect the capability of the realigned organization to provide support for WNP-2. With no change in technical expertise or capability, this change does not represent a significant reduction in a margin of safety.

The Supply System has evaluated the revision of the POC membership titles with respect to 10 CFR 50.92 and determined that it involves no significant hazards consideration because operation of WNP-2 in accordance with the proposed amendment does not:



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**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS  
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- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change is administrative in nature and does not result in any hardware or operating procedure changes. The POC review is not assumed to be an initiator of any analyzed accident. Therefore, the probability or consequences of an accident previously evaluated are not significantly increased by the requested amendment.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The changes are administrative in nature and involve no changes to the design, operation, maintenance, or testing of the plant. Therefore, the proposed changes do not create new failure modes, and 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. This change modifies the titles of two managers designated in the Technical Specifications as primary members of the Plant Operations Committee (POC). The requested changes will not result in a decrease of the knowledge or experience requirements for the designated positions and therefore will not diminish the overall quality of the POC review. With no change in expertise and no decrease in the ability of POC to achieve its review function, this change does not represent a significant reduction in a margin of safety.

The Supply System has evaluated the changes for the CNSRB with respect to 10 CFR 50.92 and determined that it involves no significant hazards consideration because operation of WNP-2 in accordance with the proposed amendment does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are administrative in nature and involve no physical changes to the plant or changes to either setpoints or operating parameters. 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. The proposed changes in the CNSRB introduce no changes to the design, operation, maintenance, or testing of the plant, and do not create a new failure mode. 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 will clarify the CNSRB membership requirements so that there is no question that additional members can be assigned to the CNSRB. Members of the CNSRB will now be appointed by the AMDO who has been assigned overall responsibility for the CNSRB. The deletion of the requirement for the Executive Secretary to be a member of the CNSRB will also enhance the operation of the Board by eliminating an administrative burden from the membership.



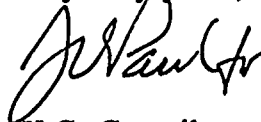
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The function of the Executive Secretary will be retained and continued by a non-member under the direction of the Chairman. Based on the foregoing, the quality of the CNSRB reviews will not be diminished and, these changes do not represent a significant reduction in a margin of safety.

As discussed above, the Supply System considers that the proposed changes do not involve a significant hazards consideration, nor is there a potential for a change in the types or increase in the amount of any effluent that may be released offsite, nor do they involve an 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)(10). Therefore, per the requirements of 10 CFR 51.22(b), an environmental assessment of these changes is not required.

This Technical Specification change 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 10 CFR 50.91, the State of Washington has been provided a copy of this letter.

Very truly yours,



W.G. Council  
Managing Director (Mail Drop 387)

WAK/bk  
Attachments

cc: KE Perkins - NRC RV  
NS Reynolds - Winston & Strawn  
WA Bishop - EFSEC  
JW Clifford - NRR  
DL Williams - BPA  
NRC Site Inspector - 927N



ADMINISTRATIVE CONTROLS

COMPOSITION

*Assistant Managing Director, Operations*

6.5.2.2 The CNSRB shall be composed of <sup>at least</sup> nine members appointed in writing by the ~~Managing Director~~ from his senior technical staff and/or from outside the Supply System. He shall designate from the members <sup>and</sup> a Chairman, an Alternate Chairman, ~~and an Executive Secretary~~. The qualifications of all members shall meet the minimum requirements of Section 4.7 of ANSI/ANS 3.1-1981 and have, cumulatively, expertise in the areas listed in Specification 6.5.2.1, as a minimum.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the CNSRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNSRB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the CNSRB Committee to provide expert advice to the CNSRB.

MEETING FREQUENCY

6.5.2.5 The CNSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the CNSRB necessary for the performance of the CNSRB review and audit functions of these Technical Specifications shall consist of the Chairman or the alternate Chairman and at least four CNSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.2.7 The CNSRB shall review:

- a. The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;





6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Assistant Managing Director for Operations and the CNSRB shall be notified.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the POC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the CNSRB, and the Assistant Managing Director for Operations.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. The applicable procedures required to implement the requirements of NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring.
- ~~k. Health Physics/Chemistry Support Program.~~ *e*

6.8.2 Each procedure of Specification 6.8.1a through ~~j~~<sup>g</sup>, and changes thereto, shall be reviewed by the POC and shall be approved by the Plant Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

~~In addition, the review and approval of the implementing procedures supporting item k. in Specification 6.8.1 will be coordinated by the Manager of Support Services, who will provide review and approval control. The WNP-2 Health Physics/Chemistry Support Program procedure will be reviewed by POC and approved by the Plant Manager.~~ *delete*

STATE OF WASHINGTON )  
COUNTY OF BENTON )

Subject: Request for Amendment to Tech Spec  
Section 6.0, Administrative Controls

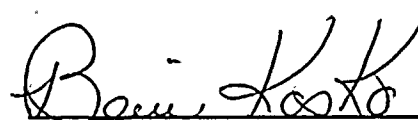
I, J. V. PARRISH, being duly sworn, subscribe to and say that I am the Assistant Managing Director, Operations for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge,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

DATE 17 February, 1994

  
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 17 day of February, 1994.

  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires 4/28/94

