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ACCESSION NBR: 9506140372      DOC. DATE: 95/06/06      NOTARIZED: YES      DOCKET #  
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power      05000397  
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SUBJECT: Application for amend to license NPF-21, changing TS 6.0,  
 "Administrative Controls" by revising Assistant Managing  
 Director, Operations & Plant Manager position titles.

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June 6, 1995  
GO2-95-106

Docket No. 50-397

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

Gentlemen:

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

In accordance with Code of Federal Regulations (CFR), Title 10 Parts 50.90 and 2.101, the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications. The proposed amendment will change Technical Specification 6.0, "Administrative Controls", by (a) revising the Assistant Managing Director, Operations and Plant Manager position titles to reflect recent title changes, (b) replacing the position titles of the Plant Operations Committee (POC) membership with the functional areas represented in the POC, (c) removing the Plant Manager from the position of POC Chairman, and (d) making a minor editorial correction.

This Technical Specification amendment request contains three attachments. Attachment 1 provides a discussion and the justification for the proposed changes. Attachment 2 describes the Supply System's evaluation of the proposed changes performed in accordance with 10 CFR 50.92(c). Attachment 3 includes the Technical Specification affected pages with the proposed changes indicated.

This Technical Specification amendment 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.

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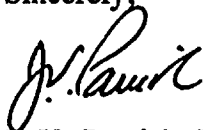
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**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS  
SECTION 6.0 ADMINISTRATIVE CONTROLS**

Should you have any questions or desire additional information, please call me or D.A. Swank at (509) 377-4563.

Sincerely,



J. V. Parrish (Mail Drop 1023)  
Vice-President, Nuclear Operations

JMP

Attachments

cc: LJ Callan, NRC-RIV  
KE Perkins, Jr., NRC-RIV, Walnut Creek Field Office  
JW Clifford - NRC  
NS Reynolds, Winston & Strawn  
NRC Sr. Resident Inspector (Mail Drop 927N)  
DL Williams, BPA (Mail Drop 399)  
FS Adair - EFSEC

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS  
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**DISCUSSION OF AND JUSTIFICATION FOR THE PROPOSED CHANGES**

The Supply System proposes to revise Technical Specifications (TS) Section 6.0, "Administrative Controls" for WNP-2. The proposed changes will (a) reflect Supply System titles for senior management throughout Section 6.0, (b) modify the Plant Operations Committee (POC) composition to specify members according to functional areas rather than by organizational titles, and (c) replace the Plant Manager as the POC Chairman with an individual appointed by the Plant General Manager, and (d) make an editorial correction.

Description of Changes

1. Where the titles of Plant Manager, Assistant Managing Director for Operations, and Assistant Managing Director, Operations, appear in TS 6.0, the following changes are proposed:

"Assistant Managing Director for Operations" is changed to "Vice-President, Nuclear Operations"

"Assistant Managing Director, Operations" is changed to "Vice-President, Nuclear Operations"

"Plant Manager" is changed to "Plant General Manager"

2. TS 6.4.1 is changed by deleting the reference to "Appendix A" of 10 CFR Part 55.

3. TS 6.5.1.2 is modified to specify the Plant Operations Committee (POC) composition in terms of the following plant functional areas rather than by designating members by organizational titles:

Operations	Administration and Records Management
Maintenance	Radiation Protection
Engineering	Technical Services
Quality	Chemistry
	Planning/Scheduling/Outage

The proposed change would require the Plant General Manager appoint, in writing, the POC chairman, Vice Chairman, and individual members from the designated functional areas.

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### SECTION 6.0 ADMINISTRATIVE CONTROLS

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#### Justification for TS Changes

The proposed senior management organizational title changes result from a reorganization of the Supply System's Operations Directorate. The title changes are administrative in nature and do not involve a change in position responsibilities.

TS 6.4.1 requires, in part, a retraining and replacement training program for the unit staff to meet or exceed the requirements and recommendations of Appendix A of 10 CFR 55. The Appendix no longer exists and its contents have been incorporated into the body of 10 CFR 55.59(c).

TS 6.5.1.2 defines the POC composition and designates POC members by specific organizational titles. The proposed TS change will delete the position titles and replace them with the functional areas to be represented in the POC. The POC serves as a multi-disciplinary review and advisory organization to the Plant Manager on matters related to nuclear and radiological safety. The proposed method of designating POC composition will provide the Plant General Manager with the flexibility to appoint qualified individuals from disciplines within a functional area. This flexibility will strengthen the POC multi-disciplinary review and advisory responsibilities. The POC composition change will also alleviate the need to process TS changes for future organizational changes involving organizational position titles, while maintaining the requirement for an multi-disciplinary POC membership.

The replacement of the Plant Manager as the POC Chairman by the proposed change will not impact the ability of the POC to execute its review and advisory responsibilities. The POC will continue to be tasked with the responsibility of recommending to the Plant General Manager approval or disapproval of TS specified items prior to their implementation. Final approval for the implementation of these items was and will continue to be the responsibility of the Plant General Manager. The proposed change to TS 6.5.1.2 establishes that the Plant General Manager will appoint, in writing, the POC Chairman, Vice Chairman, and individual members from each of the designated functional areas. POC member and alternate qualifications will continue to meet or exceed the qualification requirements of TS 6.3.1 for those individuals who fill organizational positions considered part of the unit staff in TS 6.3. Those designated POC members and alternates not considered part of the unit staff will continue to be required to possess skills and knowledge commensurate with their organizational positions. This will ensure the POC will continue to be staffed by qualified personnel having a variety of expertise and experience.

Changes similar to those proposed for the POC composition in TS 6.5.1.2 were found acceptable by the NRC and approved in Amendment 107 for the Kewaunee Station, Amendment 101 for the Fermi 2 Station, and in Amendments 126 and 65 for St. Lucie Plants 1 and 2.

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The proposed changes will not modify the functions, responsibilities, or authority of the POC, Plant General Manager, or Vice-President, Nuclear Operations. Based on the above discussion the Supply System considers the proposed changes to be acceptable.

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### EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

In accordance with the criteria for defining a significant hazards consideration established in 10 CFR 50.92, the Supply System has evaluated the proposed amendment to WNP-2 Technical Specification (TS) Section 6.0. This evaluation has determined that operation of the facility in accordance with the proposed amendment does not represent a significant hazards consideration. The following discussion is provided in support of this conclusion.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The senior management title changes are title changes only and will not impact the plant safety responsibilities associated with these positions. The removal of the Plant Operations Committee (POC) organizational titles and replacement with functional areas, and the elimination of the Plant Manager as the POC Chairman, will not impact the POC function because membership qualifications will continue to be consistent with the unit staff qualifications in TS 6.3.1 for those POC members and alternates considered part of the unit staff. Those designated POC members and alternates not considered part of the unit staff will possess skills and knowledge commensurate with their organizational positions. The proposed change ensures that POC will continue to be comprised of personnel who are experienced, have varied expertise, and are involved in daily plant activities. In maintaining the qualification requirements for members of POC, the POC will continue to fulfill its review and advisory responsibilities specified in TS 6.5.1.6 and TS 6.5.1.7. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSC) or the manner in which the SSC are operated, maintained, modified, tested, or inspected. The changes therefore do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

Because the proposed changes are of an organizational nature and their implementation does not involve physical changes to the plant SSC or the manner in which the SSC are operated and maintained, the proposed changes do not create the possibility of a new or different kind of accident. The proposed changes do not introduce any new modes of operation or alter system setpoints which could create a new or different kind of accident. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.





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3. Does the change involve a significant reduction in a margin of safety?

The senior management title changes do not impact the management responsibilities or functions associated with ensuring plant safety. Changes proposed in the POC composition will allow the scope of available expertise to be expanded without changing the POC function or responsibilities. Maintaining the current level of personnel qualifications and experience ensures the POC will continue to meet its TS review and advisory requirements. The proposed changes will not impact the basis for any Technical Specification related to the establishment of, or maintenance of, nuclear safety margins. Therefore, operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety.

Environmental Considerations

As discussed in the Significant Hazards Consideration, the proposed changes described in Attachment 1 were concluded not to involve a significant hazards consideration. Consequently, the proposed changes meet the eligibility criteria for a categorical exclusion as set forth in 10 CFR 51.22(c)(9). Therefore, in accordance with 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.