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SUBJECT: Provides suppl info & clarification of TS, describing
 administrative & editorial changes to Section 6.0,
 "Administrative Controls," of TS.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 22, 1996

GO2-96-080

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 SPECIFICATIONS
SECTION 6.0 ADMINISTRATIVE CONTROLS - SUPPLEMENTAL
INFORMATION**

Reference: Letter GO2-95-106, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specification Section 6.0 Administrative Controls," dated June 6, 1995

The purpose of this letter is to provide supplemental information and clarification of the proposed Technical Specification amendment submitted in the referenced letter. The proposed amendment described administrative and editorial changes to Section 6.0, "Administrative Controls," of the Technical Specifications. The referenced amendment request involved (a) changing senior management titles to reflect the current Supply System organization, (b) changing the Plant Operations Committee (POC) composition to specify members according to functional areas rather than by organizational titles, and (c) making an editorial correction.

As a result of recent organizational restructuring and discussions with the staff, additional administrative changes to the referenced amendment request have been identified and are discussed in Attachment 1 to this letter. Attachment 1 also provides information clarifying qualification requirements for POC members. Attachment 2 provides the Supply System's evaluation of the proposed changes described in Attachment 1. Attachment 3 includes the Technical Specification affected pages with the proposed changes indicated.

Granting this request involves no safety impact and does not involve a significant hazards consideration. The original request for Technical Specification amendment and this request have been approved by the 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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Implementation within 30 days from the amendment date is hereby requested.

Should you have any questions or desire additional information regarding this matter, please call me or L.C. Fernandez at (509) 377-4147.

Respectfully,



J.V. Parrish
Chief Executive Officer
(Mail Drop 1023)

JMP

Attachments


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

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Amendment to Technical Specifications
Section 6.0 Administrative Controls -
Supplemental Information

I, J. V. PARRISH, being duly sworn, subscribe to and say that I am the Chief Executive Officer 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.

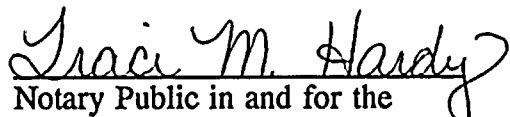
DATE 4/22, 1996



J. V. Parrish
Chief Executive Officer

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 22nd day of April 1996.



Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennelworth, WA

My Commission Expires Aug 9, 1999



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DISCUSSION OF AND JUSTIFICATION FOR THE PROPOSED CHANGES

- A. In the referenced letter the Supply System proposed changes to Technical Specifications (TS) Section 6.0, "Administrative Controls" for WNP-2. The proposed changes would (a) reflect current Supply System organizational titles for senior management throughout Section 6.0, (b) modify the Plant Operations Committee (POC) composition to specify members according to functional area rather than by organizational titles, and (c) make an editorial correction. Since the submittal of the proposed changes the Supply System has undergone additional organizational restructuring. As a result, the Supply System requests that the following administrative changes be incorporated into our original amendment request.

Description of Changes

1. Where the titles of 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 "Chief Executive Officer"

"Assistant Managing Director, Operations" is changed to "Chief Executive Officer"

2. TS 6.2.1.e is deleted and TS 6.2.1.d is revised to incorporate the quality assurance function per the line item improvement identified in NRC Generic Letter 88-06.
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	Administrative Services
Maintenance	Radiation Protection
Engineering	Chemistry
Quality	Planning/Scheduling/Outage

The proposed change also requires the Plant General Manager to appoint, in writing, the POC Chairman, Vice Chairman, and members. POC members and



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alternates will be composed of individuals from the identified functional areas, while the POC Chairman and Vice Chairman will meet the qualification requirements for a POC functional area but need not be part of a functional area.

4. TS 6.5.1.3 is modified to require the Plant General Manager to appoint, in writing, POC alternate members to serve on a temporary basis.

Justification for TS Changes

The originally proposed senior management organizational title change for the Assistant Managing Director, Operations (AMDO) was to have changed this position title to the Vice-President, Nuclear Operations while maintaining responsibility for overall plant nuclear safety per TS 6.2.1.c. Further restructuring of the organization resulted in the elimination of the AMDO position and various senior management positions. This restructuring allowed the consolidation of nuclear plant activities and plant support activities under newly created Vice President positions reporting to a Chief Executive Officer (CEO). Due to this restructuring and the re-alignment of nuclear plant activities under the newly created Vice Presidents, corporate responsibility for overall plant nuclear safety was elevated to the CEO. The elevation of corporate responsibility for overall plant nuclear safety to the CEO ensures that plant activities affecting nuclear safety continue to be the responsibility and oversight of a single corporate executive as delineated in TS 6.2.1.c. This proposed change will require each functional requirement and responsibility identified in TS section 6 for the AMDO's position to be the responsibility of the CEO. This change is considered to be administrative in nature in that the elimination of the AMDO position and the elevation of the position's responsibilities to the CEO ensure the requirements of TS 6.2.1.c continue to be met.

NRC Generic Letter (GL) 88-06 dealt with a TS line item improvement to remove organizational charts from the administrative controls section of the TS. The GL identified general requirements that would capture the essential important to safety aspects of the TS organizational charts. The GL provided proposed TS administrative controls which would allow removal of the organizational charts by implementing the GL recommendations. The GL proposed TS markup for section 6.2.1.d allowed specific functions (i.e., health physics, quality assurance) to report to the appropriate onsite manager as long as sufficient organizational freedom exists to ensure their independence from operating pressures. The Supply System requests that the quality assurance (QA) reporting requirement of TS 6.2.1.e be deleted and that TS 6.2.1.d be revised to incorporate the QA function. This change would allow the Supply System flexibility to change the organizational structure

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while maintaining the independence of the QA organization. The independence of the QA organization is assured through various controls and requirements described in the WNP-2 Operational Quality Assurance Program Description.

In the originally proposed change to TS 6.5.1.2, the POC composition was changed from designating POC members by specific organizational titles to designating POC membership by functional area. The POC membership was also broadened and strengthened with the addition of the Chemistry and Planning/Scheduling/Outage functional areas. The recent reorganization resulted in the consolidation of the Technical Services organization, which is engineering oriented, into the Engineering organization. This change results in the consolidation of the plant's Engineering functions under a single organization. As a result of this change, the Supply System proposes that the POC Technical Services functional area be combined with the POC Engineering functional area, resulting in a single Engineering focus within the POC membership.

The changes to TS 6.5.1.2 and TS 6.5.1.3 strengthen the Plant General Manager (PGM) control of POC membership by requiring PGM approval of each POC position assignment. Presently, TS Administrative Controls do not address the appointment of primary POC members because the membership is dictated by organizational position.

- B. The original amendment request stated that POC and alternate POC members, designated as unit staff per TS 6.3, would continue to meet or exceed the qualification requirements of TS 6.3.1. Those designated POC members and alternates not considered part of the unit staff would continue to be required to possess skills and knowledge commensurate with their organizational positions. As a result of conversations with the staff regarding the originally proposed amendment request, the Supply System provides the following information regarding POC membership qualifications.

POC Chairman, Vice Chariman, members and alternates will consist of individuals who meet the requirements for managerial or supervisory positions within a POC functional area. POC functional area qualifications are primarily based on the qualifications described in ANSI/ANS 18.1-1971 for comparable Supply System organizational positions, with the exception of the Radiation Protection Manager who will meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1-R, May 1977. Those individuals filling the POC Operations position will meet the qualifications outlined in the referenced standard for Operations Manager or Supervisors Requiring AEC Licenses. Individuals filling the POC Maintenance position will meet the Maintenance Manager qualifications of the referenced standard. Those individuals designated to fill the POC Engineering position will meet the qualifications of the referenced standard for the "Engineer in Charge" position. The POC

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Chemistry position will be filled by individuals who meet the Radiochemistry position qualifications of the referenced standard. Individuals filling the POC Quality position will be required to meet management qualifications outlined in Appendix I of the Operational Quality Assurance (QA) Program Description (WPPSS-QA-004).

In the case of individuals designated to fill the POC Planning/Scheduling/Outage and Administrative Services positions where qualifications are not delineated in the referenced standard, QA program, or FSAR, these individuals will possess skills and knowledge commensurate with their managerial or supervisory positions. Presently, the individuals selected to fill the POC Planning/Scheduling/Outage position should have a minimum of seven years of power plant experience with at least one year of experience in scheduling or conducting nuclear plant outages. A maximum of four of the seven years of experience may be fulfilled by the completion of academic training in the science or engineering fields. Presently, individuals selected to fill the POC Administrative Services position should have seven years experience in the administrative or records management functional areas with at least two years in a nuclear related environment. A maximum of four of the seven years may be fulfilled by the completion of academic training in a related field.

Meeting the qualification requirements described above will ensure that the POC continues to be staffed by qualified personnel having a variety of expertise and experience.

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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, along with the evaluation performed for the original amendment request, has determined that operation of the facility in accordance with the proposed amendment does not represent a significant hazards consideration. As a result, the Supply System requests that these changes be made to our original amendment request. 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 title change for the Assistant Managing Director, Operations to Chief Executive Officer is considered a necessary administrative change due to the restructuring of the organization and the elimination of the AMDO position. The TS responsibilities presently associated with the AMDO position will be the responsibility of the CEO position. This change maintains a single corporate executive responsible for overall plant nuclear safety per TS 6.2.1.c. The deletion of the QA organizational reporting requirement in TS 6.2.1.e and the inclusion of the QA organization in TS 6.2.1.d does not diminish the capability of the QA organization to maintain its independent audit and oversight role. These functions are assured through various controls and requirements in the QA program description.

The consolidation of the Technical Services POC position with the Engineering POC position does not impact the ability of the POC to perform their required functions. The consolidation of plant Engineering functions under one organization provides for an improved Engineering focus for plant activities. The addition of Chemistry and Planning/Scheduling/Outage functional areas to the POC membership, in the original amendment request, broadened and strengthened the POC, thus ensuring that the POC will continue to be comprised of experienced personnel, with varied expertise, who are involved in daily plant activities.

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.



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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 organizational in nature and 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.

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

The senior management title change does 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 responsibilities. 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 Supply System has concluded that the proposed changes to the Technical Specifications do not involve a significant hazards consideration. In addition, the proposed changes do not create the potential for a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, nor do the changes involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets 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 change is not required.