6.2.3 NUCLEAR SAFETY ASSURANCE DIVISION (NSAD)

FUNCTION

6.2.3.1 The NSAD shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The NSAD shall make detailed recommendations for revised procedures, equipment and modifications, maintenance activities, operations activities, or other means of improving unit safety to the Director of Quality Assurance.

COMPOSITION

6.2.3.2 The NSAD shall be composed of at least five, dedicated, full-time engineers, with a minimum of three located on site. Each shall have a bachelor's degree in engineering or related science or qualifications meeting ANS.3.1 Draft Revision dated March 13, 1981, Section 4.2 or 4.4, or equivalent, as described in Section 4.1 and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The NSAD shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the NSAD shall be prepared, maintained, and forwarded each calendar month to the Director of Quality Assurance.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

Insert 1

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS N18.1-1971 for comparable positions, except ~~for~~ the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1-R, May 1977. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.

*Not responsible for sign-off function.

INSERT 1

for: a) the Operations Manager who shall meet the requirements of ANSI/ANS N18.1-1971 with the exception that in lieu of meeting the stated ANSI/ANS requirement to hold a senior reactor operator's license at the time of appointment to the position, the Operations Manager shall: 1) hold a senior reactor operator license at the time of appointment; or 2) have held a senior reactor operator's license; or 3) have been certified for equivalent senior reactor operator knowledge: and b)

ATTACHMENT 3

ANNOTATED "IMPROVED" TECHNICAL SPECIFICATION PAGE

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS N18.1-1971, for comparable positions described in the FSAR, except for:

a. The Operations Manager who shall meet the requirements of ANSI/ANS N18.1-1971 with the exception that in lieu of meeting the stated ANSI/ANS requirement to hold a senior reactor operator's license at the time of appointment to the position, the Operations Manager shall:

1. hold a senior reactor operator license at the time of appointment;

2. have held a senior reactor operator's license; or

3. have been certified for equivalent senior reactor operator knowledge.

b. The Radiation Protection Manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1-R, May 1977.

No Significant Hazards Consideration Determination

In accordance with the criteria for a significant hazards consideration established in 10 CFR 50.92, the Supply System has evaluated the proposed amendment to the WNP-2 Technical Specifications and determined that it does not represent a significant hazards consideration. The following discussion is provided in support of this conclusion.

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

   The proposed amendment provides an alternate qualification criterion for the operations manager in lieu of a senior reactor operator's license at the time of appointment to the position. The alternate criterion ensures that the operations manager has certified knowledge equivalent to that of a senior reactor operator. The position of operations manager is not identified as an initiator for, or contributor to, a previously analyzed accident or transient. Additionally, either the assistant operations manager or the operations manager will maintain a senior reactor operator's license such that the on shift personnel routinely report to someone not normally on shift that has a license. The proposed change involves no change to the plant design or the manner in which the plant is operated. As such, the proposed change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

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

   The proposed amendment provides an alternate qualification criterion for the operations manager in lieu of a senior reactor operator's license at the time of appointment to the position. The alternate criterion ensures that the operations manager has certified knowledge equivalent to that of a senior reactor operator. The proposed change involves no change to the plant design or the manner in which the plant is operated. Either the assistant operations manager or the operations manager will maintain a senior reactor operator's license such that the on shift personnel routinely report to someone not normally on shift that has a license. Since the operations manager will continue to have the knowledge necessary to perform the functions of the position, and since sufficient licensed personnel will be available in accordance with other Technical Specification and 10 CFR 50.54(m)(2) requirements, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

No Significant Hazards Consideration Determination

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

The plant margins of safety are established through LCOs, limiting safety system settings, and safety limits specified in the Technical Specifications. There will be no changes to either the physical design of the plant, the manner in which the plant is operated, or to any of these settings or limits as a result of the proposed change. As such, the proposed amendment does not involve a significant reduction in a margin of safety.