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SUBJECT: Application for amends to Licenses NPF-41,NPF-51 & NPF-74, deleting organization charts from Tech Specs.Fee paid.

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161-01254-DBK/JRP
August 25, 1988

Docket Nos. STN 50-528/529/530

Document Control Desk
U. S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Technical Specification Amendment Request
Removal of Organization Charts
File: 88-F-005-419.05; 88-A-056-026

This letter is provided to request an amendment to the PVNGS Units 1, 2, and 3 Technical Specifications Section 6.2; Figures 6.2-1 and 6.2-2; Offsite and Onsite Organization. The proposed change deletes the organization charts from the Technical Specifications. The NRC has encouraged licensees to propose changes to their Technical Specifications that are consistent with the guidance provided in Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements", dated March 22, 1988.

The content required in the Administrative Controls Section of the Technical Specification is specified in 10CFR50.36.c(5). The regulation requires in part that the Technical Specification contain the controls and provisions that are necessary to assure operation of the facility in a safe manner and does not specifically require inclusion of organization charts in the Technical Specifications.

Enclosed within this amendment request are:

A. Description of Amendment Request

B. Purpose of the Technical Specification

C. Need for Technical Specification Change

D. Basis for No Significant Hazards Consideration

E. Safety Analysis of the Proposed Change Request

F. Environmental Impact Consideration Determination

G. Marked-Up Technical Specification Change Pages

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Pursuant to 10CFR50.91(b)(1), and by copy of this letter and attachment, we have notified the Arizona Radiation Regulatory Agency of this request for a Technical Specification change. In accordance with 10CFR170.12(c), the License Amendment Fee of $150 is enclosed.

If you have any questions or concerns, please call.

Very truly yours,

D. B. Karner
Executive Vice President

DBK/JRP/dlm
Attachments

cc: G. W. Knighton (all w/attachments)
M. J. Davis
J. B. Martin
T. J. Polich
C. E. Tedford

ATTACHMENT

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed Amendment request would change Technical Specification Section 6.2 by deleting Figures 6.2-1 Offsite Organization and 6.2-2 Onsite Organization. The NRC has issued Generic Letter 88-06 "Removal of Organization Charts from Technical Specification Administrative Control Requirements", which provides guidance for removal of organization charts from the administrative control requirements of the Technical Specifications. The changes involve the addition of general requirements that capture the essential aspects of the organizational structure that are defined by existing onsite and offsite organization charts.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of the Technical Specification is to provide administrative controls pursuant to 10CFR50.36. This regulation states: "Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner."

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

Generic Letter 88-06 dated March 22, 1988 provides guidance for the preparation of license amendments for the removal of onsite and offsite organization charts from Technical Specifications. The benefit of this proposal is that it would permit a licensee to implement changes to the structure of the offsite or onsite organizations without first having to obtain NRC approval through the issuance of a license amendment to update organization charts in Technical Specifications.

D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

1. The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10CFR50.92. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

   A discussion of these standards as they relate to the amendment follows:

   Standard 1 - Involves a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed change does not alter the current design of

the facility. The change deletes the onsite and offsite organization charts from the Technical Specifications. Having organization charts in the Technical Specifications duplicates those charts listed in the FSAR. Based on this and the NRC staffs review in Generic Letter 88-06, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Standard 2 - Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change does not vary, effect, or provide any physical changes to the facility. The change is based on NRC recommendation to delete the organization charts from the Technical Specification administrative control requirements. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Standard 3 - Involve a significant reduction in a margin of safety.

The proposed change does not involve a significant reduction in a margin of safety because the proposed change does not affect the design basis of the plant. The proposed change would delete the organization charts from the Technical Specification Administrative Controls. The PVNGS organization is presented in Chapter 13 of the FSAR, having it in the Technical Specifications is a duplication. Therefore, the change does not involve a significant reduction in a margin of safety.

2. The proposed change matches two of the examples given in 51FR7751 of amendments that do not include a significant hazards consideration. Specifically,

   i) The proposed amendment is a change which is an administrative change to the Technical Specifications.

   ii) The proposed change to the Technical Specifications makes the license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. (Examples: i and iv).

E. SAFETY ANALYSIS OF THE PROPOSED CHANGE REQUEST

The proposed Technical Specification change will not increase the probability or occurrence of the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. The change will not make changes in the facility, the change deletes the organization charts from the Technical Specifications. The proposed change wil replace Figures 6.2-1 and 6.2-2 with more general organizational requirements. These general requirements capture the essence of those organizational features shown on the charts.

The proposed Technical Specification change will not create the possibility of an accident or malfunction of equipment of a different type than any evaluated previously in the FSAR. No physical changes are being made to the facility, the change is administrative in nature in that the organization charts, Figures 6.2-1 and 6.2-2 are being deleted as per guidance presented in Generic Letter 88-06.

The proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification. The NRC has determined that this change will not reduce plant safety (Generic Letter 88-06).

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Units 1, 2 and 3 in accordance with this change would not:

1. Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by the staff's testimony to the Atomic Safety and Licensing Board, Supplements to the FES, Environmental Impact Appraisals, or in any decisions of the Atomic Safety Licensing Board: or

2. Result in a significant change in effluents or power levels; or

3. Result in matters not previously reviewed in the licensing basis for PVNGS which may have a significant environmental impact.

G. MARKED-UP TECHNICAL SPECIFICATION PAGE

(See attached pages)

XVI
XIX
6-1
6-3 Figure 6.2-1
6-4 Figure 6.2-2