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SUBJECT: Application for amends to Licenses DPR-58 & DPR-74,proposing to delete organization charts from Section 6.0.

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AEP:NRC:06590

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
GENERIC LETTER 88-06: REMOVAL OF ORGANIZATION CHARTS FROM TECHNICAL SPECIFICATION ADMINISTRATIVE CONTROL REQUIREMENTS

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

Attn: T. E. Murley

September 6, 1988

Dear Dr. Murley:

This letter is in response to Generic Letter (GL) 88-06 and constitutes an application for amendment to the Technical Specifications (T/Ss) for the Donald C. Cook Nuclear Plant Units 1 and 2. Specifically, we are proposing to delete the organization charts from Section 6.0 Administrative Controls as recommended by GL 88-06. A detailed description of the proposed changes and our analyses concerning significant hazards considerations are included in Attachment 1. Attachment 2 contains the proposed revised T/S pages.

We believe that the proposed changes will not result in (1) a significant change in the types of effluents or a significant increase in the amount of any effluents that may be released offsite, or (2) a significant increase in individual or cumulative occupational radiation exposure.

These proposed changes have been reviewed by the Plant Nuclear Safety Review Committee and will be reviewed by the Nuclear Safety and Design Review Committee at their next regularly scheduled meeting.

In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachments have been transmitted to Mr. R. C. Callen of the Michigan Public Service Commission and Mr. G. Bruchmann of the Michigan Department of Public Health.

Pursuant to 10 CFR 170.12(c), we have enclosed an application fee of $150.00 for the proposed amendments.

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This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,

M. P. Alexich
Vice President

ldp

Attachments

cc: D. H. Williams, Jr.
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman
A. B. Davis - Region III

Attachment 1 to AEP:NRC:06590

Reasons and 10 CFR 50.92 Significant Hazards
Evaluation for Changes to the Technical Specifications
for Donald C. Cook Units 1 and 2

The purpose of this change is to eliminate duplicating and maintaining up-to-date organizational charts in both the FSAR and the technical specifications. We, therefore, are proposing to delete the organization charts from the Section 6.0 administrative controls T/Ss. This proposed change would permit us to implement changes to the structure of the onsite and offsite organizations without first having to obtain NRC approval to update the organization charts in the T/Ss. The NRC previously approved similar changes for the McGuire Nuclear Station, Units 1 and 2, on March 16, 1986, and for the Shearon Harris Nuclear Power Plant, Unit 1, on January 27, 1988.

The content required in the administrative controls section of the T/Ss is specified in 10 CFR 50.36C(5). The regulation requires that the T/Ss contain the controls and provisions that are needed to ensure operation of the plant in a safe manner but does not specifically require organizational charts in the T/Ss. In accordance with the guidance provided in Generic Letter 88-06, we have added general requirements that capture the essential aspects of the organizational structure that are defined by existing organization charts.

Per 10 CFR 50.92, a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not:

(1) involve a significant increase in the probability or consequences of an accident previously analyzed,

(2) create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated, or

(3) involve a significant reduction in a margin of safety.

Our evaluation of the proposed change with respect to these criteria is provided below.

Criterion 1

This proposed change does not involve a significant increase in the probability or consequences of an accident previously analyzed because the deletion of the organization charts from the T/Ss does not change plant operation. We will continue to inform the NRC of organizational changes through other required controls. The Code of Federal Regulations, 10 CFR 50.34(b)(6)(i), requires us to have the organizational structure included in the Final Safety Analysis Report (FSAR). A

description of the organization and detailed organization charts are contained in Chapter 1 of the FSAR. As required by 10 CFR 50.71(e), we submit annual updates to the FSAR. Also 10 CFR 50.54(a)(3) and 10 CFR 50, Appendix B govern changes to the organization as described in the Quality Assurance Program. Some of these changes require NRC approval before they can be made.

Criterion 2

This proposed change does not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated because the proposed change is administrative in nature. There are no physical changes to the plant configuration, the setpoints, or operating parameters to be made as a result of this proposed change.

Criterion 3

This proposed change does not involve a significant reduction in a margin of safety for the reasons stated in Criterion 1.

Lastly, we note that the Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14870) of amendments considered not likely to involve a significant hazards consideration. This change is similar to the first example, which refers to changes that are purely administrative. Based on the above, we believe these changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.

Attachment 2 to AEP:NRC:06590

Proposed Revised Technical Specifications Pages