

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- 5.1.1 The Manager - Fort Calhoun Station shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

5.2 Organization

- 5.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR.
- b. The Manager - Fort Calhoun Station shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Senior Vice President - shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Plant Staff

The plant staff organization shall be as described in Chapter 12 of the USAR and shall function as follows:

- a. The minimum number and type of licensed and unlicensed operating personnel required onsite for each shift shall be as shown in Table 5.2-1.

5.0 ADMINISTRATIVE CONTROLS

5.4 Training

- 5.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Manager - Training and shall meet or exceed the requirements of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

5.5 Review and Audit

5.5.1 Plant Review Committee (PRC)

Function

- 5.5.1.1 The Plant Review Committee shall function to advise the Manager - Fort Calhoun Station on all matters related to nuclear safety.

Composition

- 5.5.1.2 The official Plant Review Committee shall consist of at least six but not more than eleven members and shall be composed of the:

~~Chairman: Manager - Fort Calhoun Station~~
~~Member: Supervisor - Operations~~
~~Member: Manager - Training~~
~~Member: Supervisor - Maintenance~~
~~Member: Supervisor - System Engineering~~
~~Member: Reactor Engineer~~
~~Member: Supervisor - Radiation Protection~~
~~Member: Supervisor - Chemistry~~
~~Member: Assistant Plant Manager~~

Chairman: Manager - Fort Calhoun Station

Members: The members shall be Department Heads or supervisory staff representing operations, maintenance, engineering, chemistry, radiation protection and other technical disciplines as determined by the Chairman.

All members shall be qualified to the applicable requirements of Specification 5.3 prior to being appointed by the Chairman.

Alternates

- 5.5.1.3 Alternate members shall be appointed in writing by the Plant Review Committee Chairman to serve on a temporary basis; ~~however, no more than two alternates shall participate in Plant Review Committee activities at any one time.~~

Meeting Frequency

- 5.5.1.4 The Plant Review Committee shall meet at least once per calendar month and as convened by the Plant Review Committee Chairman.

Quorum

5.5.1.5 A quorum of the Plant Review Committee shall consist of the Chairman ~~and four members including alternates~~ or Alternate Chairman and a majority of members including alternates. At any one time, no more than a minority of the quorum shall consist of alternate members participating as voting members in Plant Review Committee activities.

ADMINISTRATIVE CONTROLS

- 5.5.1.7 b. Render determinations in writing with regard to whether or not each item considered under 5.5.1.6(b) through (f) above constitutes an unreviewed safety question.
- c. Provide immediate written notification to the Division Manager - Nuclear Operations and the Safety Audit and Review Committee of disagreement between the Plant Review Committee and the Manager - Fort Calhoun Station; however, the Manager - Fort Calhoun Station shall have responsibility for resolution of such disagreements pursuant to 5.1.1 above.

Records

- 5.5.1.8 The Plant Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Division Manager - Nuclear Operations and Chairperson of the Safety Audit and Review Committee.

5.5.2 Safety Audit and Review Committee (SARC)Function

- 5.5.2.1 The Safety Audit and Review Committee shall function to provide the independent review and audit of designated activities in the areas of:

- a. nuclear power plant operation
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance
- i. fire protection

Composition

- 5.5.2.2 The Safety Audit and Review Committee shall be composed of:

Chairperson: ~~Division Manager - Nuclear Services~~
 Member: ~~Senior Vice President~~
 Member: ~~Vice President~~
 Member: ~~Division Manager - Nuclear Operations~~
 Member: ~~Division Manager - Production Engineering~~
 Member: ~~Manager - Fort Calhoun Station~~
 Member: ~~Other~~ qualified OPPD personnel and/or consultants as required and as determined by the SARC Chairperson

ADMINISTRATIVE CONTROLS

5.5.2.7

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Proposed changes ~~into~~ Technical Specifications ~~or licenses~~ and Facility Operating License DPR-40.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All ~~Reportable Events~~ Licensee Event Reports required by 10 CFR 50.73.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Plant Review Committee.

The Chairperson of the Safety Audit and Review Committee (SARC) may designate subgroups, special working committees, or audit teams as he deems necessary in order to carry out the responsibilities of the SARC. These subgroups, committees, or audit teams will perform the SARC responsibilities and report on their activities for review at the next regularly scheduled SARC meeting following any group's action.

Audit

5.5.2.8 Audits of facility activities shall be performed under the cognizance of the Safety Audit and Review Committee. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The performance, training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, components or method of operation that affect nuclear safety at least once per six months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per two years.

ADMINISTRATIVE CONTROLS

- 5.5.2.8
- e. The Fort Calhoun Station Emergency Plan and implementing procedures at least once every twelve months.
 - f. The Site Security Plan and implementing procedures at least once every twelve months.
 - g. The Safeguards Contingency Plan and implementing procedures at least once every twelve months.
 - h. The Radiological Effluent Program including the Radiological Environmental Monitoring Program and the results thereof, the Offsite Dose Calculation Manual and implementing procedures, and the Process Control Program for the solidifications of radioactive waste at least once per 2 years.
 - i. Any other area of facility operation considered appropriate by the Safety Audit and Review Committee or the Senior Vice President.
 - j. ~~An independent~~ The fire protection and loss prevention inspection and audit shall be performed annually program utilizing either qualified off-site licensee personnel or an outside fire protection firm consultant.
 - k. ~~An inspection and audit of the fire protection and loss prevention program by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.~~

Authority

- 5.5.2.9 The Safety Audit and Review Committee shall report to and advise the Senior Vice President on those areas of responsibility specified in Sections 5.5.2.7 and 5.5.2.8.

Records

- 5.5.2.10 Records of Safety Audit and Review Committee activities shall be prepared, approved and distributed as indicated below:
- a. Minutes of each Safety Audit and Review Committee meeting shall be prepared, approved and forwarded to the Senior Vice President within 30 days following each meeting.
 - b. Reports of reviews encompassed by Section 5.5.2.7e, f, g, h, and i above shall be prepared, approved and forwarded to the Senior Vice President within 30 days following completion of the review.
 - c. Audit reports encompassed by Section 5.5.2.8 above shall be forwarded to the Senior Vice President and to the responsible management positions designated by the Safety Audit and Review Committee within 30 days after completion of the audit.

U.S. Nuclear Regulatory Commission
LIC-94-0223

ATTACHMENT B

DISCUSSION, JUSTIFICATION AND NO SIGNIFICANT HAZARDS CONSIDERATIONS

DISCUSSION AND JUSTIFICATION:

Omaha Public Power District (OPPD) is proposing to revise the Fort Calhoun Station Unit No. 1 Technical Specifications (TS) to implement administrative changes to TS 5.2 and 5.5. The changes are administrative in nature and reflect organizational changes in OPPD Senior Management, delete the specific titles of personnel serving on the Safety Audit and Review Committee (SARC) and Plant Review Committee (PRC), revise the makeup of the PRC quorum, delete SARC audit frequencies and add minor clarifications to the descriptions of SARC reviews and audits. Also, the amendment numbers listed at the bottom of each page were reviewed and revised as necessary to show previous amendments that were inadvertently deleted and correct a typographical error.

Administrative Changes

Specifications 5.2.1, 5.5.2.8, 5.5.2.9 & 5.5.2.10

Due to an organizational change in OPPD Senior Management, the Senior Vice President is no longer responsible for OPPD's nuclear organization. A Vice President has assumed the nuclear related duties and responsibilities heretofore held by the Senior Vice President. Consequently, these Specifications are being changed to reassign these duties and responsibilities from the Senior Vice President to the Vice President.

Specifications 5.5.1.2, 5.5.1.3 & 5.5.1.5

The specific titles of PRC members are proposed for deletion from Specification 5.5.1.2. The titles will be replaced with a statement that the PRC shall contain at least six but not more than eleven members. The members shall be either department heads or "supervisory staff" representing operations, maintenance, engineering, chemistry, radiation protection and other technical disciplines as determined by the PRC Chairman. Supervisory staff consists of professional-technical personnel qualified to ANSI N18.1-1971, Section 4.4 standards, department heads and shift supervisors. The proposed change is similar to changes already approved by the NRC for River Bend Station, Unit No. 1 (Amendment 61 to Operating License NPF-47).

The limitation on the number of alternates (2) allowed to participate in PRC activities is proposed for deletion from Specification 5.5.1.3. Specification 5.5.1.5 is proposed for revision to allow an Alternate Chairman and restrict the number of alternates participating as voting members in PRC activities to a minority of the quorum. These changes will facilitate the conduct of PRC meetings yet assure adequate management oversight by restricting the number of alternates participating as voting members in PRC activities to a minority of the quorum.

DISCUSSION AND JUSTIFICATION: (Continued)

Specification 5.5.2.2

The specific titles of SARC members are proposed for deletion from Specification 5.5.2.2 and will be replaced with a statement that the SARC will be composed of qualified OPPD personnel and/or consultants as determined by the SARC Chairperson.

Specifications 5.5.2.7 & 5.5.2.8

Minor clarifications to the descriptions of SARC reviews and audits are proposed for Specification 5.5.2.7 and 5.5.2.8. Also, the frequencies associated with SARC audits are being deleted from Specification 5.5.2.8. The audit frequencies will be maintained in accordance with the NRC approved Quality Assurance (QA) Program. Any changes that could reduce the effectiveness of the QA Program must be approved by the NRC in accordance with 10 CFR 50.54(a)(3). This proposed change is similar to changes already approved by the NRC for the South Texas Project, Units 1 and 2 (Amendments 56 and 45 to Operating Licenses NPF-76 and NPF-80 respectively).

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION:

The proposed changes do not involve significant hazards considerations because operation of Fort Calhoun Station Unit No. 1 in accordance with these changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes are administrative changes to reflect organizational changes in Omaha Public Power District (OPPD) Senior Management, remove specific titles from the membership of the Plant Review Committee (PRC) and the Safety Audit and Review Committee (SARC), add minor clarifications to SARC reviews and audits and delete statements concerning the frequency of SARC audits from the Technical Specifications (TS).

The proposed change to revise the overall corporate responsibility for plant nuclear safety from the Senior Vice President to Vice President is administrative in nature as it only reflects an organizational change. Section 12 of the Updated Safety Analysis Report describes the management structure and reporting responsibilities of OPPD. Section 12 provides an organizational chart to differentiate the Vice President in charge of nuclear activities from other Vice Presidents within OPPD. Therefore, changing the corporate reporting responsibility does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to the membership of the PRC and SARC are administrative in nature since only the specific titles of the members are being removed from the TS. The management level and expertise of personnel who are PRC or SARC members is not being changed. The review of plant operations is still required to be in compliance with ANSI N18.7-1976 and Regulatory Guide 1.33, Revision 2, as committed to in the Fort Calhoun Station Quality Assurance (QA) Program. Any changes in the QA Program which reduce the effectiveness of the program must be approved by the NRC in accordance with 10 CFR 50.54(a)(3). Therefore, the proposed changes to the membership of the PRC and SARC do not involve a significant increase in the probability or consequences of an accident previously evaluated.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION: (Continued)

Clarifications of SARC reviews and audits and the deletion of SARC audit frequencies from the TS are administrative changes. The audit frequencies are required by the NRC approved QA Program and any changes that could reduce the effectiveness of the QA Program must be approved by the NRC in accordance with 10 CFR 50.54(a)(3). Therefore, the clarifications and deletion of the specific audit frequencies do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed changes are administrative in nature to reflect organizational changes in OPPD Senior Management, remove specific titles from the membership of the P&C and SARC, provide minor clarifications of SARC reviews and audits and delete statements concerning the frequency of SARC audits from the TS. The proposed changes do not revise any equipment setpoints, change the manner in which any plant equipment is operated, or propose any new operating modes. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) Involve a significant reduction in a margin of safety.

The proposed changes revise organizational and administrative requirements contained within the Administrative Controls section of the TS. The proposed changes do not revise any equipment setpoints, change the manner in which any plant equipment is operated, or propose any new operating modes. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Therefore, based on the above considerations, it is OPPD's position that this proposed amendment does not involve significant hazards considerations as defined by 10 CFR 50.92 and the proposed changes will not result in a condition which significantly alters the impact of the Station on the environment. Thus, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared.