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November 10, 1992

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U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Technical Specifications Change Request Implementing
Technical Review and Control Process

Gentlemen:

Attached for your review and approval are proposed Technical Specifications (TS) changes revising the Administrative Control sections as specified in both the Arkansas Nuclear One - Unit 1 (ANO-1) and the Arkansas Nuclear One - Unit 2 (ANO-2) TS. These changes revise the qualifications of the Plant Safety Committee (PSC) to be independent of position titles, incorporate the Technical Review and Control Process to facilitate the procedure revision process, revise the approval authority for procedures to a more appropriate level of management, and correct a typographical error.

The change in PSC qualifications is required in order to base member qualifications upon an appropriate standard. PSC composition will be based upon the qualifications an individual possesses rather than upon a specific management level title. The changes implementing a Technical Review and Control Process will result in reducing the workload on the PSC membership, allowing the members to dedicate more time to those issues important to nuclear safety. The change in procedure approval authority places this authority at an appropriate managerial level with the technical qualifications to review and approve a procedure change.

The proposed changes have been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that the changes involve no significant hazards considerations. The bases for these determinations are included in the attached submittal.

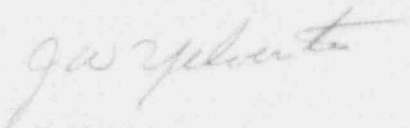
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Entergy Operations requests that the effective date for the changes be 30 days after NRC issuance of the amendment to allow for distribution and implementation of procedures governing the Technical Review and Control Process. Although this request is neither exigent nor emergency, your prompt review is requested.

Very truly yours,



JWY/CWS/jt

Attachments

cc: Mr. James L. Milhoan
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STATE OF ARKANSAS)
)
COUNTY OF POPE)

SS

Affidavit

I, J. W. Yelverton, being duly sworn, subscribe to and say that I am Vice President, Operations ANO for Entergy Operations, that I have full authority to execute this affidavit; that I have read the document numbered 0CAN119205 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

J. W. Yelverton
J. W. Yelverton

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 10th day of November, 1992.

M. Jane Davidson
Notary Public

My Commission Expires:

4-24-2002

M. JANE DAVIDSON
Notary Public
POPE COUNTY, ARKANSAS
Commission Expires 4-24-2002

ATTACHMENT

PROPOSED TECHNICAL SPECIFICATION

IN THE MATTER OF AMENDING

LICENSE Nos. DPR-51 & NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNITS ONE & TWO

DOCKET Nos. 50-313 & 50-368

DESCRIPTION OF PROPOSED CHANGES

The proposed changes to the Arkansas Nuclear One - Unit 1 (ANO-1) and the Arkansas Nuclear One - Unit Two (ANO-2) Technical Specifications (TS) revise the qualifications of the Plant Safety Committee (PSC) membership, implement a Technical Review and Control Process, change the level of procedure approval authority, and correct a typographical error as follows:

ANO-1

TS 6.5.1.2 has been changed to revise the qualifications of the PSC membership. Specifically, "at the superintendent level or above" has been changed to read, "who have the technical experience and competence required by ANSI/ANS 3.1-1981 for Managers, Professional-Technical, or Engineering and Technical Support Personnel." Also a typographical error has been corrected in this specification. The word "and" has been changed to "of."

TS 6.5.1.6.a has been changed from "Review of 1) all procedures required by Specification 6.8" to read "Review of 1) all station administrative procedures recommended in Appendix A of Reg Guide 1.33, November, 1972,." Also, a requirement for the PSC to review changes to the ANO-1 Emergency Operating Procedures has been added, and the phrase "to affect nuclear safety" has been deleted.

TS 6.5.1.6 has an added specification. TS 6.5.1.6.m reads "Review of proposed procedures and changes to procedures which involve an unreviewed safety question as defined in 10CFR50.59."

TS 6.5.1.6.i no longer requires PSC review of the Plant Security Plan implementing procedures.

TS 6.5.1.6.j no longer requires PSC review of the Emergency Plan implementing procedures.

TS 6.5.1.6.l no longer requires PSC review of the Fire Protection Program implementing procedures.

A new page (123a) has been added containing a new specification TS 6.5.3 which specifies the requirements of the Technical Review and Control Process.

TS 6.8.2 has been changed such that "reviewed by the PSC and approved by the General Manager, Plant Operations, Plant Manager, ANO-1 or responsible Major Department Head" now reads "reviewed and approved as required by 6.5."

TS 6.8.3.c has been changed such that "reviewed by the PSC, and approved by the General Manager, Plant Operations, Plant Manager, ANO-1, or responsible Major Department Head," now reads "reviewed and approved as required by 6.5."

ANO-2

TS 6.5.1.2 has been changed to revise the qualifications of the PSC membership. Specifically, "at the superintendent level or above" has been changed to read, "who have the technical experience and competence required by ANSI/ANS 3.1-1981 for Managers, Professional-Technical, or Engineering and Technical Support Personnel."

TS 6.5.1.7.a has been changed from "Review of 1) all procedures required by Specification 6.8" to read "Review of 1) all station administrative procedures recommended in Appendix A of Reg Guide 1.33, November, 1972,." Als, a requirement for the PSC to review changes to the ANO-2 Emergency Operating Procedures and the Core Protection Calculator (GPC) Software has been added, and the phrase "to affect nuclear safety" has been deleted.

TS 6.5.1.7 has an added specification. TS 6.5.1.7.m reads "Review of proposed procedures and changes to procedures which involve an unreviewed safety question as defined in 10CFR50.59."

TS 6.5.1.7.i no longer requires PSC review of the Plant Security Plan implementing procedures.

TS 6.5.1.7.j no longer requires PSC review of the Emergency Plan implementing procedures.

TS 6.5.1.7.l no longer requires PSC review of the Fire Protection Program implementing procedures.

A new specification, TS 6.5.3, has been added which specifies the requirements of the Technical Review and Control Process.

TS 6.8.2 has been changed such that "reviewed by the PSC and approved by the General Manager, Plant Operations, Plant Manager, ANO-2 or responsible Major Department Head" now reads "reviewed and approved as required by 6.5."

TS 6.8.3.c has been changed such that "reviewed by the PSC, and approved by the General Manager, Plant Operations, Plant Manager, ANO-2, or responsible Major Department Head," now reads "reviewed and approved as required by 6.5."

BACKGROUND

Currently, the ANO-1 and ANO-2 specifications require PSC members to be at a management level of superintendent or above. A more appropriate method of setting the minimum level of qualifications is desired. The levels of technical experience and competence defined by ANSI/ANS 3.1-1981 for Managers, Professional-Technical, and Engineering and Technical Support Personnel are equivalent to the levels of technical experience and competence possessed by the PSC under the current TS requirement. Setting the PSC qualifications to a standard focuses on an individual's technical experience and abilities rather than the position held in management. These general requirements and qualifications capture the essential aspects of PSC composition without compromising member function or expertise.

The Technical Review and Control Process change modifies the scope of items required to be reviewed by the PSC by limiting the review of procedures to the station administrative procedures, Emergency Operating Procedures, changes to ANO-2 Core Protection Calculator (CPC) Software, and other procedures as directed by the General Manager, Plant Operations. Procedures which do not require review by the PSC shall be subject to review and approval under the proposed Technical Review and Control Process. The PSC will continue to review the Plant Security Plan, Emergency Plan, and Fire Protection Program. Those procedure revisions which are determined to involve an unreviewed safety question per 10CFR50.59 will be referred to the PSC for disposition.

By limiting the scope of procedures requiring review by the PSC, several benefits will be realized. These benefits include:

- ° The implementation of the Technical Review and Control Process will allow the station to better utilize the wide knowledge base of personnel to effect changes to procedures, while still providing adequate controls to ensure that an acceptable level of independent review is conducted;
- ° Utilization of technical reviewers will expedite the procedure review process by eliminating the requirement for review by the PSC of designated implementation level procedures. Timely procedure approval will benefit the station by allowing procedural enhancements to be implemented in a more timely manner than that achievable under the current process.
- ° The revised process will better enable senior management to focus on maintaining an overall cognizance of station operation, and more effectively deal with emerging issues having the potential of impacting nuclear safety;
- ° Key station personnel assigned to perform the PSC review function will have additional time to conduct critical and thorough reviews of issues affecting nuclear safety;

The Technical Review and Control Process consists of an independent review conducted by a qualified individual knowledgeable in the area affected, other than the individual who prepared the procedure. In addition to ensuring the procedure is technically correct, the technical reviewer will be responsible for determining if a cross-disciplinary review is required. The technical reviewer has the authority to increase discipline review requirements as necessary to assure an adequate review is performed.

The requirement for a cross-disciplinary review ensures a comprehensive review is provided by qualified technical reviewers from other disciplines while not burdening these personnel with review requirements for which they can provide no added expertise. To assist the technical reviewer, administrative controls will be established for determining if a cross-disciplinary review is required. For example, any procedure which requires active interface with another department will require a cross-disciplinary review.

Qualified technical reviewers to be used in the technical review process shall be designated by the General Manager, Plant Operations. This designation shall include the disciplines and procedure categories for which the reviewer is qualified. Each individual designated to perform these reviews shall meet the appropriate qualifications of ANSI/ANS 3.1-1981, Selection, Qualification and Training of Personnel for Nuclear Power Plants, Section 4, excluding subsections 4.3.2 and 4.5, for the specified areas. The appropriate qualifications for those areas not specified in the standard will be set at a level commensurate with those in the standard. These qualifications will ensure the technical reviewer provides a level of technical experience and expertise equivalent to that provided by the PSC, as these reviewers will have the technical knowledge and familiarity with their areas of review.

Procedures which do not require a review by the PSC will be approved by the department head responsible for the affected procedure, as specified in the station administrative procedures. Department head approval for these changes is an acceptable level of authority since all department heads are required to meet minimum acceptable qualifications of ANSI N18.1-1971 for comparable positions. This places the approval authority for procedures at a level consistent with the responsibility for implementation of the procedure.

Record keeping requirements will be provided for procedure reviews conducted in accordance with the Technical Review and Control Process. The requirements will be consistent with those established for the existing procedure review process. Overview of the Technical Review function will be provided by the ANO Quality Assurance organization. The initial evaluation will be incorporated into the Quality Assurance audit schedules following the administrative implementation of the Technical Review and Control Process.

The Technical Review and Control process, department head approval authority, and the change in PSC member qualifications are consistent with the requirements specified in NUREG 1430 Rev 0 and NUREG 1432 Rev 0, Revised Standardized Technical Specifications (RSTS). Similar review functions have been approved by the NRC for several facilities which include Limerick, Peach Bottom, Byron, Braidwood, LaSalle, and Zion.

DISCUSSION OF CHANGE

Under these proposed changes, the TS regarding PSC composition continue to define the number and qualifications of the PSC members. The level and quality of PSC review will be unaltered by the proposed changes. The PSC is currently composed of eight members and a chairman from the ANO onsite operating organization and this is not altered by the changes. A review of the levels of technical experience and competence defined by ANSI/ANS 3.1-1981 for Managers, Professional-Technical, and Engineering and Technical Support Personnel shows them to be equivalent to the levels of technical experience and competence possessed by the PSC under the current TS requirement. In addition to the ANO-1 and ANO-2 TS, the PSC composition is controlled by ANO Station Administrative Procedure 1000.002, "Plant Safety Committee Operations."

The addition of the Technical Review and Control Process to the TS provides an additional method for the technical review and approval of selected station procedures, while maintaining an equivalent level of thoroughness consistent with that established by the PSC. An independent technical review, conducted by an individual whose qualification and knowledge encompass the area affected by the procedure, combined with the added expertise contributed by the cross-disciplinary review would establish an equivalent level of review to that provided by the PSC.

Approval of procedures reviewed by the Technical Review and Control Process may be performed by the department head responsible for the affected procedure, after ensuring all necessary procedure reviews and cross-disciplinary reviews have been completed. Additionally, the General Manager, Plant Operations has the option of designating a higher approval authority for any procedure or block of procedures.

The Technical Review and Control Process will be controlled by station administrative procedures which will continue to be reviewed by the PSC and approved by the General Manager, Plant Operations or Plant Manager. The Technical Review and Control Process only applies to procedures and programs, as designated in the specifications, but not to modifications, tests and experiments.

The implementation procedures for the Security Plan, Emergency Plan, and Fire Protection Program will be reviewed under the Technical Review and Control Process. This places the level of review and approval for these procedures at a level consistent with other implementation level procedures. The PSC will continue to review the Plant Security Plan, Emergency Plan, and Fire Protection Program.

Implementation of the proposed review methodology will allow ANO to optimize the utilization of its management resources by permitting the PSC to focus on those items having a greater potential for affecting nuclear safety.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards considerations using the standards in 10CFR50.92(c). A discussion of these standards as they relate to this amendment request follows:

Criterion 1 - Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.

The change in the PSC composition qualification requirements is administrative in nature. The proposed changes do not affect assumptions contained in the plant safety analyses, the physical design or operation of the plants. TS that preserve the safety analyses assumptions of ANO-1 and ANO-2 are not affected by the changes. The same level of expertise applied to the PSC review function will remain with the approval of the proposed changes. There will be no loss in PSC effectiveness due to the proposed changes. The typographical error correction in the ANO-1 TS is purely administrative in nature, and has no affect on plant safety.

The addition of the Technical Review and Control Process to the TS provides an additional method for the technical review and approval of selected station procedures, while maintaining an equivalent level of thoroughness consistent with that established by the PSC. An independent technical review, conducted by an individual whose qualification and knowledge encompass the area affected by the procedure, combined with the added expertise contributed by the cross-disciplinary review will establish an equivalent level of review to that provided by the PSC. The Technical Review and Control Process will be controlled by station administrative procedures which will continue to be reviewed by the PSC, thereby allowing PSC oversight of the process.

Approval of procedures reviewed by the Technical Review and Control Process may be performed by the department head responsible for the affected procedure, after ensuring all necessary procedure reviews and cross-disciplinary reviews have been completed. Additionally, the General Manager, Plant Operations has the option of designating a higher approval authority for any procedure or block of procedures.

The procedures governing plant operation will continue to ensure that the plant parameters are maintained within acceptable limits. Procedure changes will be reviewed and approved at a level commensurate with their importance to nuclear safety and, where appropriate, an interdisciplinary review will be required. All modifications, tests, and experiments that affect nuclear safety will continue to be reviewed by the PSC. Also, the PSC will continue to review the Plant Security Plan, Emergency Plan, and Fire Protection Program.

Therefore, this change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

Criterion 2 - Does Not Create the Possibility of a New or Different Kind of Accident from Any Previously Evaluated.

The proposed changes are administrative in nature. No physical alterations of plant configuration or changes to setpoints or operating parameters are proposed. The level of position qualifications of the PSC members are not reduced in the TS. The same quality of PSC review is maintained by this proposed change.

Because no new equipment is being introduced, and no equipment is being operated in a manner inconsistent with its design, the probability of equipment malfunction is not increased. The applicable procedures governing the operation of installed equipment will receive reviews and approvals at a level commensurate with their importance to nuclear safety and, where appropriate, an interdisciplinary review will be required. This provides an equivalent level of review to that provided by the PSC. The PSC will continue to review all modifications, tests, and experiments that affect nuclear safety ensuring a continuing commitment to nuclear safety by ANO management.

Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes are administrative in nature and do not relate to or modify the safety margins defined in and maintained by the TS. The change does not alter ANO's commitment to maintain a management structure that contributes to the safe operation and maintenance of the plants. No position qualifications are being reduced in the TS. The level and quality of PSC review is maintained because there will be no change in the collective expertise on the PSC. The independent review of those items important to nuclear safety by the PSC will continue with these changes.

The initial conditions utilized in the accident analyses remain unchanged. The methodologies used for the safety analyses are not affected by this change. Sufficient controls are included in the proposed review methodology to ensure that the plant conditions and equipment availability required to support the integrity of the analyses, and hence the margin to safety, will continue to be maintained.

Therefore, this change does not involve a significant reduction in the margin of safety.

Therefore, based upon the reasoning presented above and the discussion of the amendment request, Entergy Operations has determined that the requested change does not involve a significant hazards consideration.