



ARKANSAS POWER & LIGHT COMPANY

FIRST COMMERCIAL BUILDING/P.O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 371-7901

December 20, 1985

T. GENE CAMPBELL  
Vice President  
Nuclear Operations

2CAN128507

Director of Nuclear Reactor Regulation  
ATTN: Mr. Edward J. Butcher, Acting Chief  
Operating Reactors Branch #5  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Unit 2  
Docket No. 50-368  
License No. NPF-6  
Proposed Changes to Specifications 6.5.1.2,  
6.5.2.2, 6.5.2.8, figures 6.2-1 and 6.2-2

Gentlemen:

This letter transmits proposed changes to the Arkansas Nuclear One - Unit 2 Technical Specification as listed below:

1. Changes to Specification 6.5.2.2 are purely administrative and are being made to clarify the responsibility for SRC appointments and total membership of the committee. This change replaces job titles referenced in the current Technical Specification with functional descriptions, thus reducing the need for future Technical Specification changes due to minor restructuring of the organization;
2. Proposed Changes to Specification 6.5.2.8.j and k are submitted to make the section consistent with the Standard Technical Specification;
3. Changes to Figures 6.2-1 and 6.2-2 are requested due to reorganization and position title changes; and
4. Changes to Specifications 6.1.1, 6.4.1, 6.4.2, 6.5.1, 6.8.2, and 6.8.3 are proposed to reflect the changes in PSC membership and position titles due to reorganization and to make these sections consistent with the Arkansas Nuclear One - Unit 1 Technical Specifications.

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PDR ADOCK 05000368  
P PDR

*Adol w/check 150<sup>00</sup>  
# 12-8539*

*Add:*

AD - D. CRUTCHFIELD (ltr only)  
EB (W. JOHNSTON)  
RSB (THOMAS)  
EICSB (PARR)  
FOB (W. HEGAN)

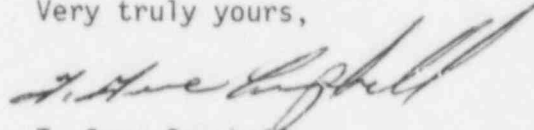
December 20, 1985

Attachments to this letter include the Significant Hazards Consideration (SHC) with basis for determination and revised Technical Specification pages.

In accordance with 10CFR50.92(c), we have determined the proposed amendment as having no Significant Hazards Consideration. A copy of this proposed amendment is being forwarded to Mr. E. Frank Wilson, Director, Division of Environmental Health.

Pursuant to 10CFR170.12(c), we are including a check in the amount of \$150.00 as an application fee.

Very truly yours,



T. Gene Campbell

TGC/SAB/lw

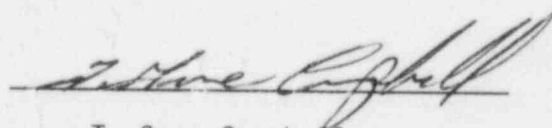
Attachments

cc: Mr. E. Frank Wilson, Director  
Division of Environmental Health Protection  
State Department of Health  
4815 West Markham Street  
Little Rock, AR 72201

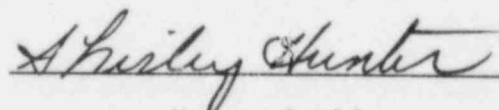
STATE OF ARKANSAS    )  
                              )  
COUNTY OF PULASKI    )

SS

I, T. Gene Campbell, being duly sworn, subscribe to and say that I am Vice President, Nuclear Operations, for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 2CAN128507 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

  
T. Gene Campbell

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 20<sup>th</sup> day of December, 1985.

  
Notary Public

My Commission Expires:

3-1-91

## Description of Amendment Request

This Technical Specification change request is submitted as a result of a proposed reorganization of AP&L's Nuclear Operations Department. This reorganization change will result in changes to figures 6.2-1 and 6.2-2 as well as the title references in the text of the Technical Specifications. Changes to Specification 6.5.2.2 will result in referencing the functional descriptions of the personnel required on the SRC rather than the job titles as is now done. This will reduce the need for future Technical Specification changes due to minor restructuring of the organization and title changes. Additionally Specification 6.5.2.8 is being changed to be consistent with the Standard Technical Specification.

One change in the organization that should be noted is the consolidation of the three (3) quality organizations at ANO and the general offices in Little Rock. The current ES Quality Assurance Section reporting to the Director, Energy Supply Services, the ANO Construction Quality Control Section reporting to the ANO Field Construction Manager, and the Nuclear Quality Control Section reporting to the ANO General Manager will all now report to the Nuclear Quality General Manager, who will report directly to the Vice President, Nuclear Operations.

These changes eliminate fragmented responsibilities for quality activities and elevate the reporting level of the quality organization to a higher level of management. In order to increase the involvement of the quality organization in plant activities, the Nuclear Quality General Manager will have interface with the Director, Site Nuclear Operations for day to day activities. However, in order to maintain the independence of the quality organization, the Nuclear Quality General Manager will administratively report to the Vice President, Nuclear Operations. The proposed changes provide for the on-site QA group to perform all internal audits including those of the other quality groups. Independence of the auditors will be retained by directing the audit reports to the Nuclear Quality General Manager and the Vice President, Nuclear Operations.

The other changes which are of interest affect the ANO Organization. The position of ANO General Manager has been replaced by the position of Director, Site Nuclear Operations. This individual will have four positions reporting directly to him rather than the current six, thus reducing the span of control and enhancing the ability of the Director, Site Nuclear Operations to carry out his duties.

Of the four proposed positions reporting to the Director, Site Nuclear Operations, three are new. These positions are Plant Modifications Manager, General Manager Plant Operations, and General Manager Plant Support. The Plant Modifications Manager will be responsible for the implementation of all ANO construction projects. The General Manager Plant Operations will combine the management of Operations, Maintenance and the Work Control Center under one General Manager. Each of these positions previously reported directly to the ANO General Manager. Finally, the General Manager Plant Support will combine the supervision for Engineering, Training,

Technical Support and Administration under one individual. These changes in organization will combine areas of responsibility that are related and decrease the direct supervision role of the Director, Site Nuclear Operations.

## Basis For No Significant Hazards Consideration Determination

The proposed Technical Specification change is purely administrative in nature and is being made for the following reasons:

1. To clarify the responsibility of Safety Review Committee appointments and total membership of the committee by replacing titles referenced in the current Technical Specification with functional descriptions, thus reducing the need for future Technical Specification changes due to minor restructuring of the organization;
2. to make Section 6.5.2.8 (audits) consistent with the standard Technical Specifications;
3. to update the Technical Specification to reflect the organization and mode of operation which will be placed into effect in early 1986; and
4. to reflect title changes and change in makeup of the ANO Plant Safety Committee (PSC) due to reorganization.

This change does not reduce the effectiveness of the PSC, SRC, or ANO plant management organization. The appropriate technical disciplines necessary to carry out the functions of the PSC and SRC would still be represented on those committees. Additionally the effectiveness of the ANO management organization will be enhanced. Thus, no change to the operation or configuration of Arkansas Nuclear One will result from this proposed Technical Specification change. Therefore this change does not involve a significant increase in the probability or consequences of an accident previously evaluated nor does it create the possibility of a new or different kind of accident.

The proposed change is an administrative change which results from Nuclear Operations reorganization and improves Technical Specification consistency with the Standard Technical Specifications. These changes do not involve a significant reduction in a margin of safety.

Based on the above, AP&L has determined that this change does not involve a significant hazards consideration.

The Commission has provided guidance concerning the application of these standards by providing certain examples (DLOP 228, Federal Register, Vol. 48, P. 14870). The proposed amendment matches example (i), "a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specification, correction of an error, or a change in nomenclature."