



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 140 TO FACILITY OPERATING LICENSE NO. NPF-1

PORTLAND GENERAL ELECTRIC COMPANY

THE CITY OF EUGENE, OREGON

PACIFIC POWER AND LIGHT COMPANY

TROJAN NUCLEAR PLANT

DOCKET NO. 50-344

1.0 INTRODUCTION

By letter dated January 15, 1988 as revised February 15, 1988, Portland General Electric Company (PGE) requested changes to the Offsite and Facility Organization Charts in Trojan Technical Specification (TS) Section 6.2, "Organization," Figures 6.2-1 and 6.2-2.

More specifically, Figure 6.2-1, "Offsite Organization" would be revised by:

- (a) Deleting from the Figure, those positions which do not directly or indirectly, report to the President;
- (b) Moving those positions which are part of the Facility Organization from Figure 6.2-1 to Figure 6.2-2, "Facility Organization;"
- (c) Indicating that the General Manager of Corporate Security will report to the Vice President, Nuclear;
- (d) Deleting the position of Vice President, Operating Services, and Manager, Control Systems; and
- (e) Implementing various changes to titles and reporting structure for those positions outside the responsibility of the Vice President, Nuclear.

Figure 6.2-2, "Facility Organization" would be revised by:

- (a) Adding the positions of Vice President, Nuclear, and General Manager, Technical Functions to the Figure to illustrate the interface of the Offsite Organization with the Facility Organization;
- (b) Deleting staff level positions (with the exception of Operations) from the Figure so that only the supervisory positions are shown;

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- (c) Illustrating the newly created positions of Manager, Personnel Protection, System Engineering Branch Manager, Surveillance and Test Engineering Branch Manager, Procurement Supervisor, Quality Assurance Operations Branch Manager, and Quality Control Supervisor;
- (d) Illustrating the line of reporting of the Performance Monitoring/Events Assessment group;
- (e) Indicating title changes to numerous existing positions (e.g., Branch Manager instead of Supervisor);
- (f) Changing the line of reporting for the Manager, Plant Modifications from the Plant General Manager to General Manager, Technical Functions;
- (g) Changing the line of reporting for the Shift Technical Advisor from the Reactor Engineer to the Manager, Technical Services;
- (h) Changing the lines of reporting for the Chemistry Supervisor and Radiation Supervisor from the Manager, Technical Services to the newly created Manager, Personnel Protection; and
- (i) Illustrating an existing position (Plant Safety Coordinator) on the Figure, and indicating the line of reporting for that position.

DISCUSSION AND EVALUATION

Proposed Changes to Figure 6.2-1 "Offsite Organization"

The divisional responsibility for the safe operation of Trojan Nuclear Plant lies with the Nuclear Division within Portland General Electric Company. This responsibility is shouldered by the position, Vice President, Nuclear. As such, any organizational information shown in Figure 6.2-1 that is external to the Vice President, Nuclear is provided to illustrate the corporate organization relative to the Vice President, Nuclear. These external positions are required for overall corporate structure, but do not affect the day to day operations of the Nuclear Division.

As such, the a) removal of those positions which do not directly or indirectly report to the President, and b) deletion of positions and implementation of various changes to titles and reporting structure for those positions outside the responsibility of the Vice President, Nuclear, are acceptable since the safe operation of the plant is not affected, and since the clarity of Figure 6.2-1 is improved.

The relocation of those positions which are part of the Facility Organization from Figure 6.2-1 to Figure 6.2-2 is acceptable since this revision more accurately illustrates the Offsite and Onsite Organizations.

The change which indicates the General Manager of Corporate Security reporting the Vice President, Nuclear was proposed since the majority of security related activities is associated with Trojan Nuclear Plant. This change would enhance the implementation and control of security

measures that require technical support and regulatory interface. Thus, this proposed change is acceptable.

Proposed Changes to Figure 6.2-2, "Facility Organization"

Change No.

Description

- a) The intent of Figure 6.2-2 is to illustrate the major departments and positions onsite, and to
- b) illustrate its interface with the offsite organization.

Therefore, the proposed addition of the offsite positions of Vice President, Nuclear and General Manager, Technical functions to the Figure, to illustrate interface between corporate and onsite management, is acceptable. The proposed deletion of staff level positions within the major onsite departments with the exception of Operations is acceptable since it clarifies the figure and in no way affects the management organization at the facility.

- c.1) The proposed position of Manager, Personnel Protection, is a new position which assumes overall responsibility for chemistry, radiation protection, and safety. This change provides greater management oversight in these three areas which support the safe operation of Trojan. The Plant Safety Coordinator, which would report to the Manager, Personnel Protection, coordinates the onsite industrial safety program. This is not a new position at Trojan, but is now being reflected in the organization chart in the Technical Specifications.

Since one individual responsible for personnel protection should provide consistent guidance and oversight to those disciplines for which the Manager, Personnel Protection is responsible, the overall level of safety should be enhanced. Therefore, the proposed position of Manager, Personnel Protection, and the change in line of reporting for the Chemistry and Radiation Protection Supervisors, and Plant Safety Coordinator are acceptable.

- c.2) The duties of the existing Engineering Supervisor are proposed to be divided between two new positions: the System Engineering Branch Manager and the Surveillance and Test Engineering Branch Manager.

The System Engineering Branch Manager will be responsible for providing technical support for plant operations through the evaluation and resolution of issues related to primary and balance-of-plant systems, and electrical systems. The manager will also be responsible for operational experience reviews as they relate to plant system performance, engineering for plant modifications, safety and operability analyses and procedure development.

The Surveillance and Test Engineering Branch Manager will be responsible for monitoring plant performance through the use of test and surveillance procedures in order to ensure that the plant performance conforms to license requirements, applicable codes and standards, and goals for efficient operation. The manager will also be responsible for the American Society of Mechanical Engineers (ASME) Section XI Inservice Inspection Program, Inservice Testing Program for Pumps and Valves, and Repair and Replacement Program.

The proposed division of responsibility should provide greater management oversight and effectiveness of plant engineering activities. Therefore, the proposed positions of System Engineering Branch Manager, and Surveillance and Test Engineering Branch Manager are acceptable.

- c.3) The proposed position of Procurement Supervisor would designate an individual to be responsible for ordering plant equipment and materials. This includes material for warehouse inventory, plant modifications and maintenance.

The addition of this position would relieve the Materials Supervisor of procurement responsibilities, thus allowing greater attention to be placed on other responsibilities including the receiving, handling, storage, shipping, and issuing of plant equipment and materials. Therefore, the proposed creation of Procurement Supervisor is acceptable.

- c.4) The proposed positions of Quality Assurance (QA) Operations Branch Manager and Quality Control (QC) Supervisor reflect a division of QA and QC responsibilities within the onsite QA organization. The previous position of QA Supervisor had responsibility for both QA and QC functions.

The position of QA Operations Branch Manager would have responsibility for coordinating and scheduling audits, surveillances, and review of Trojan Nuclear Plant operations and onsite support organizations; reviewing and concurring with onsite-prepared quality-related purchase requisitions; functioning as the QA representative on the Plant Review Board; issuing and tracking all onsite Nonconforming Activity Reports (NCARs); and reviewing and concurring with all onsite quality-related procedures.

QC functions which would be performed by the QC Supervisor include providing QA/Nondestructive Examination (NDE) coverage of construction, maintenance, and modification activities; tracking all Nonconformance Reports (NCRs) conducting material receipt inspections; and developing,

maintaining and approving QC/NDE procedures and guidelines for observation of in-process work.

This division of responsibility should enhance the effectiveness of the QA organization since its efforts would not be distracted by QC responsibilities. In addition, a potential conflict of interest situation regarding the auditing of QC functions by QA will be removed. Therefore, the proposed positions of QA Operations Branch Manager and QC Supervisor are acceptable.

- d) Performance Monitoring/Event Analysis (PM/EA) is an existing group responsible for supporting line management in trending, event analysis, review, and performance monitoring of activities that effect the safe and reliable operation of the Trojan Nuclear Plant. PM/EA activities are directed by the Vice President, Nuclear to ensure the most effective utilization of resources to monitor Nuclear Division activities.

This group is added to Figure 6.2-2 to illustrate its location within the organization. This addition is considered to be an administrative change to the Technical Specification, and is acceptable.

- e) PGE has proposed that current positions designated as department Supervisors be retitled as Branch Managers. Various other editorial changes in position titles are also proposed.

Since the qualification requirements of the positions involved have not been altered, nor have the functions and responsibilities of the positions been changed, we find this proposed change to be acceptable.

- f) Currently, the Manager, Plant Modification reports directly to the Plant General Manager. It is proposed that the position report instead to the General Manager, Technical Functions (Offsite).

This shift in reporting would centralize responsibility and control of the design and installation of plant design changes with the General Manager, Technical Functions, since the offsite organization is also responsible for plant engineering. As such, we find this proposed change to be acceptable.

- g) The current organizational chart indicates the position of Shift Technical Advisor (STA) reporting to a Reactor Engineer. It is now proposed to show the STA as reporting to the Manager, Technical Services.

The change in reporting for the STAs clarifies overall program responsibility under the Manager, Technical Services. This change does not reflect any shift in responsibility. The Reactor Engineer, who also serves as an STA, continues to have support

responsibilities such as scheduling watch rotations. However, since the Reactor Engineer is a staff position below the Supervisor level, it has been removed from the organization chart. As such we find this proposed change to be acceptable.

- h) The acceptability of this change is discussed in Item C.1 above.
- i) The existing position of Plant Safety Coordinator is proposed to be indicated on Figure 6.2-2. Since this position deals with a matter involving personnel protection it is logical that this position report to the Manager, Personnel Protection, the acceptability of which is discussed in item C.1 above.

2.0 CONTACT WITH STATE OFFICIAL

The NRC staff has notified the Oregon Department of Energy of the proposed issuance of this amendment along with the proposed determination of no significant hazards consideration. No comments were received.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(10). Pursuant to 10 CFR §51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

PRINCIPAL CONTRIBUTOR:
T. Chan

Dated: April 11, 1988