

## INDEX

### 3/4.2 CRANE TRAVEL - SPENT FUEL PIT

#### BASES

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The restriction on movement of loads in excess of the nominal weight of a fuel assembly over fuel assemblies in the spent fuel pit ensures that in the event this load is dropped (1) the activity release will be limited to that contained in a single fuel assembly, and (2) any possible distortion of the fuel in the storage racks will not result in a critical array. This assumption is consistent with the activity release assumed in the accident analysis.

Handling of the present Spent Fuel Storage Building roof hatches under administrative control will assure safe handling of the roof hatches. The restriction of movement of the spent fuel inspection stand, the spent fuel assembly nondestructive test equipment, the cask hatch cover, the volume reduction equipment, the shipping cask liners over spent fuel ensures that these items cannot be dropped on spent fuel. Dropping any one of these items from its maximum height will not result in loss of integrity of the spent fuel pit floor. Handling of the fuel handling equipment for infrequent maintenance under administrative control will ensure the safe handling of any fuel handling components.

The use of a single-failure-proof crane provides assurance that a credible single failure will not result in the shipping and/or transfer cask, the cask set-down pad, the cask hatch cover, and the cask components and associated lifting devices having an adverse effect on the spent fuel pit or the irradiated fuel in the spent fuel pit. The restriction on movement of the shipping and/or transfer cask, the cask set-down pad, the cask hatch cover, and the cask components and lifting devices further ensures that these items cannot be dropped on spent fuel in the spent fuel pit storage racks. The use of a single-failure-proof crane ensures that the cask hatch cover and the cask components and associated lifting devices, which are permitted over the spent fuel in the cask, cannot be dropped on the spent fuel. The safe load path is established to support the defense-in-depth approach to safety concerning heavy loads over the spent fuel pit. Deviations from or changes to the safe load path shall be performed in accordance with approved written procedures which have been reviewed by an Independent Safety Reviewer and approved by the Decommissioning Manager or designee.

6.0 ADMINISTRATIVE CONTROLS (Continued)

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6.3 FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility management/supervisory staff shall meet or exceed the minimum qualifications of ANSI 18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall also meet the minimum qualifications of Regulatory Guide 1.8, Revision 1.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the facility Certified Fuel Handlers shall be conducted in accordance with an NRC approved training program. A training program for the unit staff shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971.

6.5 DELETED

Pages 6-6 through 6-12 have been deleted.

## 6.0 ADMINISTRATIVE CONTROLS (Continued)

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### 6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by an Independent Safety Reviewer and the results of this review shall be submitted to the Independent Review and Audit Committee (IRAC) and the Decommissioning Manager.

### 6.7 DELETED

Pages 6-14 through 6-15 have been deleted.

## 6.0 ADMINISTRATIVE CONTROLS (Continued)

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### 6.8 REPORTING REQUIREMENTS

The following identified reports shall be submitted pursuant to 10 CFR 50.4. The reporting requirements of 6.8.1, 6.8.2 and 6.8.3 are in accordance with Revision 4 of Regulatory Guide 1.16, "Reporting of Operating Information - Appendix A Technical Specifications."

- 6.8.1 Annual Report Annual reports covering the activities of the unit as described below for the previous year shall be submitted prior to March 1 of each year.

Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, (a) e.g., operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), and waste processing.

6.0 ADMINISTRATIVE CONTROLS (Continued)

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- a. Sealed Source leakage in excess of limits,  
Specification 3.5.

6.9 DELETED

6.0 ADMINISTRATIVE CONTROLS (Continued)

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6.10 RADIATION PROTECTION PROGRAM

- 6.10.1 Procedures for personnel radiation protection shall be prepared consistent with requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposures.

## 6.0 ADMINISTRATIVE CONTROLS (Continued)

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### 6.12 PROCESS CONTROL PROGRAM (PCP)

#### 6.12.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as specified by YDQAP Appendix D (Record Retention). This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s), and
  - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of federal, state, or other applicable regulations.
- b. Shall become effective after review and acceptance by an Independent Safety Reviewer and the approval of the Decommissioning Manager (or a designee).

6.0 ADMINISTRATIVE CONTROLS (Continued)

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6.13 OFF-SITE DOSE CALCULATION MANUAL (ODCM)

6.13.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as specified by YDQAP Appendix D (Record Retention). This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s), and
  - 2) A determination that the change will maintain the level of the radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by an Independent Safety Reviewer and the approval of the Decommissioning Manager (or a designee).
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.