

- 6.5.1.9 The Emergency Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.
- 6.5.1.10 A knowledgeable individual(s)/group shall review every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports to the Vice President-TMI Unit 1 covering evaluations, recommendations and disposition of the corrective action to prevent recurrence.
- 6.5.1.11 Major changes to radwaste systems shall be reviewed by a knowledgeable individual(s)/group other than the individuals(s)/group which prepared them.
- 6.5.1.12 Individuals responsible for reviews performed in accordance with 6.5.1.1 through 6.5.1.4 shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate personnel. Individuals responsible for reviews considered under 6.5.1.1, 6.5.1.3, and 6.5.1.4 shall render determinations in writing with regard to whether or not NRC approval is required pursuant to 10CFR50.59.

RECORDS

- 6.5.1.13 Written records of activities performed under Specifications 6.5.1.1 through 6.5.1.11 shall be maintained.

QUALIFICATIONS

- 6.5.1.14 Responsible Technical Reviewers shall meet or exceed the qualifications of ANSI/ANS 3.1 of 1978 Section 4.6, or 4.4 for applicable disciplines, or have 7 years of appropriate experience in the field of his specialty. Credit toward experience will be given for advanced degrees on a one-to-one basis up to a maximum of two years. Responsible Technical Reviewers shall be designated in writing.

6.5.2 INDEPENDENT SAFETY REVIEW FUNCTION

- 6.5.2.1 The director of each department shall be responsible for ensuring the independent safety review of the subjects described in 6.5.2.5 within his assigned area of safety review responsibility, as assigned in the Review and Approval Matrix.
- 6.5.2.2 Independent safety review shall be completed by an individual/group not having direct responsibility for the performance of the activities under review, but who may be from the same functionally cognizant organization as the individual/group performing the original work.
- 6.5.2.3 The licensee shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Nondestructive testing
- f. Instrumentation and control
- g. Radiological safety
- h. Mechanical engineering
- i. Electrical engineering
- j. Administrative controls and quality assurance practices
- k. Emergency plans and related organization, procedures and equipment
- l. Other appropriate fields associated with the unique characteristics of TMI-1.

6.5.2.4 Consultants may be utilized as determined by the cognizant department director to provide expert advice.

RESPONSIBILITIES

6.5.2.5 The following subjects shall be independently reviewed by the functionally assigned divisions:

- a. Written evaluations of changes in the facility as described in the Updated Final Safety Analysis Report (UFSAR), of changes in procedures as described in the UFSAR, and of tests or experiments not described in the UFSAR, which are completed without prior NRC approval under the provisions of 10CFR50.59(c)(1). This review is to verify that such changes, tests or experiments did not involve a change in the Technical Specifications or require NRC approval pursuant to 10CFR50.59. Such reviews need not be performed prior to implementation.
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or requires NRC approval pursuant to 10CFR50.59. Matters of this kind shall be reviewed prior to submittal to the NRC.
- c. Proposed changes to Technical Specifications or license amendments related to nuclear safety shall be reviewed prior to submittal to the NRC for approval.
- d. Violations, deviations, and reportable events which require reporting to the NRC in writing. Such reviews are performed after the fact. Review of events covered under this subsection shall include results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.
- e. Written summaries of audit reports in the areas specified in Section 6.5.3 and involving safety related functions.