

### 6.5.3 AUDITS

6.5.3.1 Audits of facility activities shall be performed in accordance with the Quality Assurance Topical Report (QATR). These audits shall encompass:

- a. The conformance of facility operations to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.
- d. The Facility Emergency Plan and implementing procedures.
- e. The Facility Security Plan and implementing procedures.
- f. The Fire Protection Program and implementing procedures.
- g. The performance of activities required by the QATR to meet the criteria of Appendix 'B', 10 CFR 50.
- h. The radiological environmental monitoring program and the results thereof.
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for radioactive wastes.
- k. Any other area of facility operation considered appropriate by the Chief Nuclear Officer.

6.5.3.2 Audits of the following shall be performed under the cognizance of the department director responsible for technical support.

- a. An independent fire protection and loss prevention program inspection and audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.

## RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 30 days after completion of the audit. Upper management shall be informed per the QATR.

6.5.4 DELETED

## 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 Section 50.73 to 10 CFR Part 50; and
- b. Each REPORTABLE EVENT shall be reported to the cognizant manager and the cognizant department director and the Vice President – Oyster Creek. The functionally cognizant department staff shall prepare a Licensee Event Report (LER) in accordance with the guidance outlined in 10 CFR 50.73(b). Copies of all such reports shall be submitted to the functionally cognizant department director and the Vice President - Oyster Creek.

## 6.7 SAFETY LIMIT VIOLATION

### 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. If any Safety Limit is exceeded, the reactor shall be shut down immediately until the Commission authorizes the resumption of operation.
- b. The Safety Limit violation shall be reported to the Commission and the Vice President-Oyster Creek.
- c. A Safety Limit Violation Report shall be prepared. The report shall be submitted to the Vice President-Oyster Creek. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components systems or structures, (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission within ten days of the violation.

## 6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the items referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 as referenced in the QATR.
- b. Surveillance and test activities of equipment that affects nuclear safety and radioactive waste management equipment.
- c. Refueling Operations.
- d. Security Plan Implementation.
- e. Fire Protection Program Implementation.
- f. Emergency Plan Implementation.
- g. Process Control Plan Implementation.
- h. Offsite Dose Calculation Manual Implementation.
- i. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 4.15, Revision 1.
- j. Plant Staff Overtime pursuant to Technical Specification 6.2.2.2(i), above.

6.8.2 Each procedure required by 6.8.1 above, and substantive changes thereto, shall be reviewed and approved as described in 6.5.1 prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1, above, may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the licensee's management staff qualified in accordance with 6.5.1.14 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision holding a Senior Reactor Operator's License on the unit.
- c. The change is documented, reviewed and approved as described in 6.5.1 within 14 days of implementation.

## 6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principle maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All Licensee Event Reports.
- d. Records of surveillance activities, inspections and calibrations required by these technical specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to operating procedures.
- g. Deleted.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of doses received by all individuals for whom monitoring was required entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to these technical specifications.
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- j. Deleted.

- k. Records of Environmental Qualification which are covered under the provisions for paragraph 6.14.
- l. Records of the service lives of all snubbers, including the date which the service life commences, and associated installation and maintenance records.
- m. Records of results of analyses required by the Radiological Environmental Monitoring Program.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PLAN.
- o. Records of radioactive shipments

6.10.3 Quality Assurance Records shall be retained as specified by the QATR.

#### 6.11 RADIATION PROTECTION PROGRAM

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

6.12 (Deleted)

#### 6.13 HIGH RADIATION AREA

6.13.1 In lieu of the "control device" or "alarm signal" required by Section 20.1601 of 10 CFR 20, each high radiation area in which the intensity of radiation at 30 cm (11.8 in.) is greater than deep dose equivalent of 100 mRem/hr but less than 1,000 mRem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

NOTE: Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are following plant radiation protection procedures for entry into high radiation areas.

An individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a pre-set integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive exposure control over the activities within the area and who will perform periodic radiation surveillance at the frequency in the RWP. The surveillance frequency will be established by the management position responsible for radiological controls.

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- f. Any other matters involving safe operation of the nuclear power plant which a reviewer deems appropriate for consideration, or which is referred to the independent reviewers.

#### 6.5.2.6 QUALIFICATIONS

The independent reviewer(s) shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the area being reviewed or have 9 years of appropriate experience in the field of his specialty. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

#### RECORDS

6.5.2.7 Reports of reviews encompassed in Section 6.5.2.5 shall be prepared, maintained and transmitted to the cognizant department director and the Vice President-TMI Unit 1.

#### 6.5.3 AUDITS

6.5.3.1 Audits of unit activities shall be performed in accordance with the Quality Assurance Topical Report (QATR). These audits shall encompass:

- a. The conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the entire unit staff.
- c. The verification of the non-conformances and corrective actions program to be properly implemented and documented as related to action taken to correct deficiencies occurring in unit equipment, structures, systems or methods of operation that affect nuclear safety.
- d. The performance of activities required by the QATR to meet the criteria of Appendix "B" 10 CFR 50.
- e. The Emergency Plan and Implementing procedures.
- f. The Security Plan and implementing procedures.
- g. The Fire Protection Program and implementing procedures.
- h. The Offsite Dose Calculation Manual (ODCM) and implementing procedures.



- i. The Process Control Program and implementing procedures for solidification of radioactive wastes.
- j. The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December, 1977.
- k. Any other area of unit operation considered appropriate by the Chief Nuclear Officer.

6.5.3.2 Audits of the following shall be performed under the cognizance of the department director responsible for technical support.

- a. An independent fire protection and loss prevention program inspection and audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.

#### RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 60 days after completion of the audit. Upper management shall be informed per the QATR.

6.5.4 DELETED

DELETED

6.10.2 The following records shall be retained for the duration of Operating License DPR-50 unless otherwise specified in 6.10.1 above.

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Routine unit radiation surveys and monitoring records.
- d. Records of doses received by all individuals for whom monitoring was required.
- e. Records of radioactive liquid and gaseous wastes released to the environment, and records of environmental monitoring surveys.
- f. Records of transient or operational cycles for those facility components which affect nuclear safety for a limited number of transients or cycles as defined in the Final Safety Analysis Report.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QATR.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Deleted.
- l. Records of analyses required by the radiological environmental monitoring program.
- m. Records of the service lives of all safety related hydraulic snubbers including the date at which the service life commences and associated installation and maintenance records.
- n. Records of solid radioactive shipments.
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.