



Crystal River Nuclear Plant
15760 W. Power Line Street
Crystal River, FL 34428

Docket 50-302
Operating License No. DPR-72

May 7, 2015
3F0515-01

10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-001

Subject: Crystal River Unit 3 – License Amendment Request #317, Revision 0, Revision to Improved Technical Specifications Administrative Controls Section to Establish Permanently Defueled Technical Specifications

- References:
1. CR-3 to NRC letter dated September 4, 2013, "Crystal River Unit 3 – License Amendment Request #313, Revision 1, Revision to Improved Technical Specifications Administrative Controls for Permanently Defueled Conditions and Response to Requests for Additional Information" (ADAMS Accession No. ML13255A056)
 2. CR-3 to NRC letter dated April 25, 2013, "Crystal River Unit 3 – License Amendment Request #313, Revision 0, Revision to Improved Technical Specifications Administrative Controls for Permanently Defueled Conditions" (ADAMS Accession No. ML13128A286)
 3. NRC to CR-3 letter dated July 11, 2014, "Crystal River Unit 3 – Issuance of Amendment to Facility Operating License Regarding Changes to the Administrative Controls Section of the Technical Specifications" (ADAMS Accession No. ML14097A145)

Dear Sir:

Pursuant to 10 CFR 50.90, Duke Energy Florida, Inc. (DEF) hereby provides License Amendment Request (LAR) #317, Revision 0, for the Crystal River Unit 3 (CR-3) Improved Technical Specifications (ITS) Administrative Controls Section that reflects organizational changes associated with placing CR-3 in a permanently defueled safe condition. In Reference 1, CR-3 responded to Requests for Additional Information (RAIs), and replaced in its entirety, the proposed changes provided in Reference 2. LAR #313, Revision 0, provided changes to reflect the CR-3 organization and functions associated with the decommissioning of the plant (Reference 2). In Reference 3, the NRC approved these changes to the CR-3 ITS Administrative Controls Section, issuing License Amendment No. 244.

LAR #317 provides replacement pages for the CR-3 ITS Administrative Controls Sections: 5.1.1; 5.2.1.b; 5.3.2; and 5.6.2.3, changing the title of the position with overall responsibility for the safe handling and storage of nuclear fuel and licensee initiated changes to the Offsite Dose Calculation Manual from either the 'Plant Manager' or the 'Decommissioning Director' to the 'General Manager Decommissioning.'

There are no new regulatory commitments made within this submittal.

A001
NRR

The CR-3 Plant Nuclear Safety Committee has reviewed this LAR and recommended it for approval.

If you have any questions regarding this submittal, please contact Mr. Phil Rose, Lead Engineer, Nuclear Regulatory Affairs, at (352) 563-4883.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 7, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald R.", followed by a large, stylized capital letter "B".

Ronald R. Reising, Senior Vice President
Operations Support

RRR/faw

Attachments: A. Description of Proposed License Amendment Request, Proposed
 Changes, and Regulatory Analysis
 B. Proposed Technical Specification Page Changes, Strikeout and
 Shadowed Text Format
 C. Proposed Technical Specification Page Changes, Revision Bar Format

xc: NRR Project Manager
 Regional Administrator, Region I

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DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

**LICENSE AMENDMENT REQUEST #317, REVISION 0,
REVISION TO IMPROVED TECHNICAL SPECIFICATIONS
ADMINISTRATIVE CONTROLS SECTION TO ESTABLISH
PERMANENTLY DEFUELED TECHNICAL SPECIFICATIONS**

ATTACHMENT A

**DESCRIPTION OF PROPOSED LICENSE AMENDMENT
REQUEST, PROPOSED CHANGES, AND REGULATORY
ANALYSIS**

**LICENSE AMENDMENT REQUEST #317, REVISION 0, REVISION TO IMPROVED
TECHNICAL SPECIFICATIONS ADMINISTRATIVE CONTROLS SECTION TO ESTABLISH
PERMANENTLY DEFUELED TECHNICAL SPECIFICATIONS**

1.0 DESCRIPTION

By letter dated September 4, 2013 (Reference 4.1), Duke Energy Florida, Inc. (DEF) requested a revision to the Administrative Controls Section of the Crystal River Unit 3 (CR-3) Improved Technical Specifications (ITS) based upon responses to Requests for Additional Information resulting from the submittal of License Amendment Request (LAR) #313 (Reference 4.2). LAR #313 requested changes to the Administrative Controls Section based upon organizational changes associated with placing the plant in the permanently defueled safe condition.

By letter dated July 11, 2014 (Reference 4.3), the NRC provided License Amendment No. 244 to the CR-3 ITS Administrative Controls Section to reflect changes to the CR-3 organization and functions associated with the decommissioning of the plant.

Since the issuance of License Amendment No. 244, additional organizational changes associated with decommissioning and placing CR-3 in a permanently defueled safe condition have occurred. LAR #317, Revision 0, provides replacement pages for Improved Technical Specifications Administrative Controls Sections: 5.1.1; 5.2.1.b; 5.3.2; and 5.6.2.3, where the title of 'Plant Manager' or 'Decommissioning Director' is consolidated and changed to 'General Manager Decommissioning.' The CR-3 Plant Manager position is being eliminated and will not be in effect once CR-3 enters the SAFSTOR phase of decommissioning. All responsibilities, as delineated in the CR-3 ITS, are being transferred to the General Manager Decommissioning. The Decommissioning Director position underwent a title change to General Manager Decommissioning with no change in duties or responsibilities.

2.0 Proposed Changes

LAR #317 provides replacement pages for the CR-3 ITS revising Administrative Controls Sections: 5.1.1; 5.2.1.b; 5.3.2; and 5.6.2.3, changing the title of the position with overall responsibility for the safe handling and storage of nuclear fuel and licensee initiated changes to the Offsite Dose Calculation Manual (ODCM) from either the 'Plant Manager' or the 'Decommissioning Director' to the 'General Manager Decommissioning.' The Plant Manager and Decommissioning Director have been consolidated into the General Manager Decommissioning and reflect DEF organizational changes associated with decommissioning and placing CR-3 in a permanently defueled safe condition. The responsibility, review and approval authority for these Administrative Controls remains at the same or higher level. These changes are consistent with 10 CFR 50.36.(c).(6), *Decommissioning*, in that Technical Specifications involving Administrative Controls will be developed on a case-by-case basis, and NUREG-1430, "Standard Technical Specifications - Babcock and Wilcox Plants," which states that special titles may be specified for those unit staffs with unique organizational structures.

Several of these LAR #317 changes affect proposed revisions that were made in LAR #316, Revision 0, "Revise and Remove License Conditions and Revision to Improved Technical Specifications to Establish Permanently Defueled Technical Specifications," (ADAMS Accession No. ML13316C083) that was submitted on October 29, 2013. As a result, some of these changes reflected herein are presented on pages with LAR #316 changes.

Specifically:

Section 5.1.1

The current wording for Section 5.1.1 states:

"The Plant Manager shall be responsible for overall facility functions and shall delegate in writing the succession to this responsibility during his absence."

"The Plant manager or his designee shall approve, prior to implementation, each proposed test, experiment, or modifications to systems or equipment that affect stored nuclear fuel."

The proposed revisions state:

"The General Manager Decommissioning shall be responsible for overall facility functions and shall delegate in writing the succession to this responsibility during his absence."

"The General Manager Decommissioning or his designee shall approve, prior to implementation, each proposed test, experiment, or modifications to systems or equipment that affect stored nuclear fuel."

Section 5.2.1.b

The current wording for Section 5.2.1.b states:

"The Decommissioning Director shall have overall responsibility for the safe handling and storage of nuclear fuel, and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure the safe handling and storage of nuclear fuel."

"The Plant Manager shall be responsible to control those onsite activities necessary for the safe handling and storage of nuclear fuel; and"

The proposed revisions state:

"The General Manager Decommissioning shall have overall responsibility for the safe handling and storage of nuclear fuel, and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure the safe handling and storage of nuclear fuel."

"The General Manager Decommissioning shall be responsible to control those onsite activities necessary for the safe handling and storage of nuclear fuel; and"

Section 5.3.2

The current wording for Section 5.3.2 states:

"A training and retraining program for the Certified Fuel Handler positions shall be maintained under the direction of the Plant Manager."

The proposed revision states:

"A training and retraining program for the Certified Fuel Handler positions shall be maintained under the direction of the General Manager Decommissioning."

Section 5.6.2.3

The current wording for Section 5.6.2.3 states:

"Licensee initiated changes to the Offsite Dose Calculation Manual (ODCM):

2. Shall become effective after review and acceptance by the on-site review function and the approval of the Plant Manager; and"

The proposed revision states:

"Licensee initiated changes to the Offsite Dose Calculation Manual (ODCM):

2. Shall become effective after review and acceptance by the on-site review function and the approval of the General Manager Decommissioning; and"

3.0 Regulatory Analysis

No Significant Hazards Consideration

Criterion 1: Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The consolidation of Plant Manager and Decommissioning Director to General Manager Decommissioning changes to the Administrative Controls sections of the CR-3 Improved Technical Specifications has no effect on the performance of these defined responsibilities. The overall responsibility for these Administrative Controls sections remains at the same level or higher: (1) delegating in writing the succession to this responsibility during any absence; (2) approving, prior to implementation, any change to tests, experiments or modifications to systems or equipment that affect stored nuclear fuel; (3) ensuring the acceptable performance of the staff involved in operating, maintaining, and providing technical support to ensure the safe handling and storage of the nuclear fuel; (4) ensuring that the training and retraining of the Certified Fuel Handler positions are in accordance with the applicable standards; and (5) ensuring that any licensee initiated changes to the ODCM are effective only after acceptance by the General Manager Decommissioning.

The proposed CR-3 ITS Administrative Controls sections consolidation of Plant Manager and Decommissioning Director to General Manager Decommissioning are administrative in nature, and have no direct effect on any plant system, the operation and maintenance of CR-3 or any previously evaluated accident. These changes reflect DEF hierarchical changes associated with CR-3 decommissioning and placing the unit in the permanently defueled safe storage condition.

Criterion 2: Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed CR-3 ITS Administrative Controls sections consolidation of Plant Manager and Decommissioning Director to General Manager Decommissioning are administrative in nature, and have no direct effect on any plant system, the operation and maintenance of CR-3 or any previously evaluated accident. The consolidation of Plant Manager and Decommissioning Director to General Manager Decommissioning changes to the Administrative Controls sections of the CR-3 ITS have no effect on the performance of these previously delineated responsibilities. The overall responsibility for these Administrative Controls sections remains at the same level or higher. These changes reflect DEF hierarchical changes associated with CR-3 decommissioning and placing the unit in the permanently defueled safe storage condition.

Criterion 3: Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed CR-3 ITS Administrative Controls sections consolidation of Plant Manager and Decommissioning Director to General Manager Decommissioning are administrative in nature, have no direct effect on any plant system, does not involve any physical plant limits or parameters, License Condition, Technical Specification Limiting Condition of Operability, or operating philosophy, and therefore cannot affect any margin of safety.

The consolidation of Plant Manager and Decommissioning Director to General Manager Decommissioning changes to the Administrative Controls sections of the CR-3 ITS have no effect on the performance of these previously delineated responsibilities. The overall responsibility for these Administrative Controls sections remains at the same level or higher. These changes reflect DEF hierarchical changes associated with CR-3 decommissioning and placing the unit in the permanently defueled safe storage condition.

Therefore, a no significant hazards consideration conclusion is reached.

Environmental Impact Evaluation

10 CFR 51.22(c) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if the amendment changes a requirement with respect to changing the name, position or title of an officer of the licensee or permit holder, including but limited to, the radiation safety officer or quality assurance manager provided that (i) the amendment involves no significant hazards consideration, (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

CR-3 has reviewed this LAR and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10)(iv). Pursuant to 10 CFR 51.22(c), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the proposed license amendment. The following is the basis for this determination:

(i) The proposed license amendment does not involve a significant hazards consideration, as described in the significant hazards evaluation.

(ii) As discussed in the Justification for the Request and the No Significant Hazards Consideration, this change does not result in a significant change or significant increase in the release associated with any Design Basis Accident. The proposed amendment is associated with changing the titles of responsible managers in the Administrative Controls sections of the CR-3 Improved Technical Specifications with all responsibilities remaining the same. There will be no significant change in the types or a significant increase in the amounts of any effluents released offsite during normal operation since no structures, system or components (SSCs) are associated with the proposed amendment. There will be no significant change in the types or increase in the amounts of any effluents that may be released offsite and does not involve irreversible environmental consequences beyond those already associated with the CR-3 Final Environmental Statement since no SSCs are associated with the proposed amendment.

(iii) The proposed LAR does not result in a significant increase to the individual or cumulative occupational radiation exposure because the proposed amendment is a change to titles of managers' responsibilities in the Administrative Controls sections of the CR-3 Improved Technical Specifications and does not affect components that interface with radiologically contaminated SSCs, and does not affect operator or other actions that could increase occupational radiation exposure. Therefore, the proposed LAR does not result in a significant increase to the individual or cumulative occupational radiation exposure.

This application and the accompanying administrative changes for CR-3 are exempt from environmental review because they fall within the categorical exclusion of 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," paragraph (c)(10)(iv), "Changes the name, position, or title of an officer of the licensee or permit holder, including but not limited to, the radiation safety officer or quality assurance manager".

The proposed General Manager Decommissioning change to ODCM Section 5.6.2.3 reflects a more conservative level of management organizational change for reviewing and approving changes to the ODCM. There are no proposed changes to the ODCM reflected in this submittal. The proposed change does not involve an increase in the amounts or change the types, of any radiological effluents that may be allowed to be released offsite, and do not involve any increase in the amounts or change in the types of any non-radiological effluents that may be released offsite as it is strictly an administrative change. Further, no increase in the individual or cumulative occupational radiation exposure is involved.

Therefore, the more conservative General Manager Decommissioning proposed change to ODCM Section 5.6.2.3 is administrative in nature and supports the conclusion that the change is exempt from an environmental considerations review.

Applicable Regulatory Requirements/Criteria

10 CFR 50.82(a)(1) requires that when a licensee has determined to permanently cease operations the licensee shall, within 30 days, submit a written certification to the NRC, consistent with the requirements of §50.4(b)(8), and once fuel has been permanently removed from the reactor vessel, the licensee shall submit a written certification to the NRC that meets the requirements of §50.4(b)(9). CR-3 submitted the required certifications by letter dated February 20, 2013 (ADAMS Accession No. ML13056A005). The NRC acknowledged receipt of

the required certifications by letter dated March 13, 2013 (ADAMS Accession No. ML13058A380).

10 CFR 50.36 establishes the requirements for Technical Specifications. §50.36(c)(5), Administrative Controls, identifies that an Administrative Controls section shall be included in the Technical Specifications and shall include provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. This LAR is proposing changes to the Administrative Controls section consistent with the decommissioning status of the plant. This LAR applies the principles identified in §50.36(c)(6), Decommissioning, for a facility which has submitted certification required by §50.82(a)(1) and proposes changes to the Administrative Controls appropriate for the CR-3 permanently defueled condition. As §50.36(c)(6) states, this type of change should be considered on a case-by-case basis.

4.0 References

- 4.1 CR-3 to NRC letter dated September 4, 2013, "Crystal River Unit 3 – License Amendment Request #313, Revision 1, Revision to Improved Technical Specifications Administrative Controls for Permanently Defueled Conditions and Response to Requests for Additional Information" (ADAMS Accession No. ML13255A056)
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CRYSTAL RIVER UNIT 3

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ATTACHMENT B

**PROPOSED TECHNICAL SPECIFICATION PAGE CHANGES,
STRIKEOUT AND SHADOWED TEXT FORMAT**

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The ~~Plant~~ General Manager Decommissioning shall be responsible for overall facility functions and shall delegate in writing the succession to this responsibility during his absence.

The ~~Plant~~ General Manager Decommissioning or his designee shall approve, prior to implementation, each proposed test, experiment or modifications to systems or equipment that affect stored nuclear fuel.

5.1.2 The Shift Supervisor shall be responsible for the shift command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions responsible for activities affecting the safe handling and storage of nuclear fuel.

- a. Lines of authority, responsibility, and communications shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These shall be documented in the FSAR;
- b. The General Manager Decommissioning ~~Director~~ shall have overall responsibility for the safe handling and storage of nuclear fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure the safe handling and storage of nuclear fuel. The General ~~Plant~~ Manager Decommissioning shall be responsible to control those onsite activities necessary for the safe handling and storage of nuclear fuel; and
- c. The individuals who train the Certified Fuel Handlers, carry out health physics or perform quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. Each duty shift shall be composed of at least one Shift Supervisor and one Non-certified Operator.
- b. Shift crew composition may be less than the minimum requirement of 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1, 1971 for comparable positions, except for the Radiation Protection Manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- 5.3.2 A training and retraining program for the Certified Fuel Handler positions shall be maintained under the direction of the Plant General Manager Decommissioning.
-

5.6 Procedures, Programs and Manuals

5.6.2.3 ODCM (continued)

2. For Iodine-131, Iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to a dose rate of 1500 mrems/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

Licensee Initiated Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
 - b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent dose, or setpoint calculations.
2. Shall become effective after review and acceptance by the on-site review function and the approval of the Plant General Manager Decommissioning; and

(continued)

DUKE ENERGY FLORIDA, INC.

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REVISION BAR FORMAT**

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- b. The General Manager Decommissioning shall have overall responsibility for the safe handling and storage of nuclear fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure the safe handling and storage of nuclear fuel. The General Manager Decommissioning shall be responsible to control those onsite activities necessary for the safe handling and storage of nuclear fuel; and
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(continued)

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(continued)