

Thomas D. Gatlin
Vice President, Nuclear Operations
803.345.4342



July 22, 2015
RC-15-0109

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
LICENSE AMENDMENT REQUEST - LAR 14-02981
PROPOSED REVISION TO TECHNICAL SPECIFICATION 6.0
"ADMINISTRATIVE CONTROLS"

South Carolina Electric & Gas Company (SCE&G), acting for itself and as an agent for South Carolina Public Service Authority pursuant to 10 CFR 50.90, hereby submits a request for amendment to Technical Specifications (TS). The proposed amendment will change TS Section 6.0, "Administrative Controls" by revising the Shift Supervisor title to Shift Manager. The bases and evaluation for the proposed change are included as an Enclosure.

SCE&G requests approval of the proposed amendment by June 1, 2016. Once approved, the amendment shall be implemented within 30 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated South Carolina Official.


This proposed change has been reviewed and approved by both the VCSNS Plant Safety Review Committee and Nuclear Safety Review Committee.

The proposed change does not include any new commitments. If you have any questions or require additional information, please contact Bruce Thompson at (803) 931-5042.

A001
NRR

I certify under penalty of perjury that the information contained herein is true and correct.

7/22/2015
Executed on


Thomas D. Gatlin

BJH/TDG/wt

Enclosure: Evaluation of the Proposed Revision to Technical Specification 6.0,
"Administrative Controls"

Attachments:

1. Proposed Technical Specification Change (MARK-UP)
2. Proposed Technical Specification Change (RETYPE)
3. List of Regulatory Commitments

c: K. B. Marsh
S. A. Byrne
J. B. Archie
N. S. Carns
J. H. Hamilton
J. W. Williams
W. M. Cherry
V. M. McCree
S. A. Williams
NRC Resident Inspector
K. M. Sutton
P. Ledbetter
S. E. Jenkins
NSRC
RTS (CR-14-02981)
File (813.20)
PRSF (RC-15-0109)

VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12

Enclosure

Evaluation of the Proposed Revision to Technical Specification 6.0, "Administrative Controls"

Subject: This evaluation supports a request to amend South Carolina Electric & Gas Company (SCE&G), Technical Specifications (TS) Section 6.0, "Administrative Controls" by revising the Shift Supervisor title to Shift Manager.

1.0 SUMMARY DESCRIPTION

These proposed changes are to be implemented based on recommendations from Institute of Nuclear Power Operations (INPO) within Significant Operating Experience Report (SOER) 96-1, Control Room Supervision Operational Decision-Making and Teamwork dated September 27, 1996 and ACAD 97-004, Guidelines for Shift Manager Selection, Training and Qualification, and Professional Development dated April 1997. The requested change is administrative in nature and will not alter the qualifications, functions, responsibilities or authorizations previously established by 10 CFR 50.36, 10 CFR 50.54 and 10 CFR 55.

SCE&G requests approval of the proposed amendment by June 1, 2016. Once approved, the amendment shall be implemented within 30 days or less.

2.0 DETAILED DESCRIPTION

This amendment request is to revise TS section 6.0, "Administrative Controls," for the generic position title Shift Supervisor to Shift Manager. Specifically, the title of Shift Supervisor is being changed to Shift Manager in the following TS sections: 6.1.2, Table 6.2-1, 6.2.4, and 6.12.2. This change has been

recommended by INPO within SOER 96-1 dated September 27, 1996. The SOER discusses events caused by deficiencies in supervisory oversight, reactivity control, teamwork, and crew decision-making. Observations of control room operating crews showed that performance is affected by the leadership of the Shift Supervisor and Control Room Supervisor. The individuals filling the roles of supervisors must function as team leaders and maintain close oversight of control room activities to detect errors or lapses in judgment or a breakdown in role responsibilities by other crew members. The supervisors must remain fully involved in all control room evolutions and be prepared to assert their authority for command and control whenever high standards are not being maintained. The change in position title Shift Supervisor to Shift Manager is intended to integrate the senior licensed shift crew member into the plant management team.

As a member of station management, the Shift Supervisor is central to the operating organization's ability to safely operate the station and meet the demands of the operations mission in accordance with station management's expectations. Shift Supervisors fully integrated into the management team are better able to internalize the station's goals, articulate those goals to their operating crews, and ensure all on-shift operations and support personnel work toward achieving those goals. The Shift Supervisor's management role is to facilitate and champion the practical application of the principles of safe and reliable station operation while holding operations and support personnel accountable to the high standards of performance expected by station management. The change in generic title to Shift Manager is still representative for the title of the senior licensed shift crewmember. This proposed change reflects the practice adopted by several licensees to emphasize the scope and significance of the responsibilities for this position.

3.0 TECHNICAL EVALUATION

Organizational structure and the conduct of operations of South Carolina Electric & Gas Company are discussed in the Final Safety Analysis Review (FSAR) Chapter 13. The Virgil C. Summer Nuclear Station is operated from one central control room. The Shift Supervisor is directly responsible for the safe and efficient operation of the plant. For the operation of one unit, each shift is normally manned by one Shift Supervisor (Licensed Senior Reactor Operator), one Control Room Supervisor (Licensed Senior Reactor Operator), one Nuclear Reactor Operator (Licensed Senior Reactor Operator or Licensed Reactor Operator), and Reactor Operators and Auxiliary Operators (no license required, but desirable). At least one of the Reactor Operators and Auxiliary Operators will have a Reactor Operator's License. There shall be a total of at least two licensed Senior Reactor Operators and two licensed Reactor Operators per shift.

In addition to the "operations" shift crew as stated above, there shall be one shift engineer and at least one Health Physics Specialist onsite at all times.

The Shift Supervisor, who reports to the Manager, Operations via the Operations Supervisor, is in direct charge of the plant, including startup, power operations, and shutdown. The Shift Supervisor will initiate immediate action in the event of an upset situation to avoid exceeding the Technical Specifications limitations, to avert possible injury or undue radiation exposure to personnel, or to prevent damage to plant equipment. The Shift Supervisor has the responsibility of supervising the actions of the station operators (Control Room Supervisor, Senior Reactor Operator, Reactor Operator, and Auxiliary Operators) to assure safe and prudent operation of the facility. The Shift Supervisor initiates immediate corrective action in any upset situation until assistance, if required, arrives. Other responsibilities include; ensuring plant operating procedures are kept current, and when deemed necessary, initiating changes to these procedures; ensuring that his or her shift is properly manned and other groups are called in to work when necessary; coordinating all maintenance and testing being performed during his or her shift; and ensuring that the training of personnel assigned to his or her shift as required by the overall training and retraining programs is conducted. FSAR section 13.1.3.1.5 provides a general guideline of the qualification requirements for the Shift Supervisor that meet the minimum requirements set forth in Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants" Revision 2.

SCE&G is committed to NQA-1-1994, Parts I, II, and III. The Shift Supervisor position is discussed within various types of procedures used by SCE&G to govern the design, operation, and maintenance of its nuclear generating plants. SCE&G follows the guidance of Appendix A to Regulatory Guide 1.33 Revision 2 in identifying the types of activities that should have procedures or instructions to control the activity. Quality Assurance Program Description (QAPD) reflects the Shift Supervisor responsibilities and the requirement that a directive be established that contains clear delineation of the management chain of authority. The proposed changes for this amendment impacts the title only and, therefore, the change will not alter the qualifications, functions, responsibilities or authorizations previously established. Needed changes to the QAPD would not be a reduction in effectiveness, therefore, changes can be processed under a 10 CFR 50.54(a) Evaluation.

This proposed change will not lower the safety or effectiveness of the organization. The title change from Shift Supervisor to Shift Manager does not change the intent of the Technical Specifications or the qualifications, functions, responsibilities and authorizations previously established by 10 CFR 50.36, 10 CFR 50.54 and 10 CFR 55. This proposed change reflects the practice

adopted by several licensees to emphasize the scope and significance of the responsibilities for this position.

4.0 REGULATORY EVALUATION

For reactor operators, senior reactor operators, fuel handlers, fire protection personnel, and positions specified in 10 CFR 50.120, programs are developed, established, implemented and maintained using a systems (or systematic) approach to training (SAT) as defined by 10 CFR 55.4 and ANSI/ANS-3.1-1993 as endorsed by Regulatory Guide (RG)-1.8. The title of Shift Supervisor is categorized within 10 CFR 50.120 but is never defined and within RG 1.8, Sections 4.3.1.1, the generic title of "Shift Supervisor," of ANSI/ANS-3.1-1981 is endorsed. NUREG-0578 makes a reference to the Shift Supervisor's command function or position as that of a "manager" or "commander" of shift operations and the latest draft revision of the Standard Review Plan Chapter 13.1.2 (Draft Revision 7) section 3.C.iii uses the title interchangeably with shift manager.

4.1 Applicable Regulatory Requirements / Criteria

10 CFR 50.34

(b)(6)(i) requires that the FSAR for a license to operate a nuclear power plant include information concerning the organizational structure, personnel qualifications, and related matters.

10 CFR 50.36

(c)(5) requires administrative controls related to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner to be in the Technical Specifications. The details of the organization and management that are required to be in the Technical Specifications were delineated in Generic Letter (GL) 88-06, "Removal of Organization Charts From Technical Specifications Administrative Control Requirements," dated March 22, 1988. These details included the "Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license."

10 CFR 50.54

(l) The licensee shall designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators pursuant to part 55 of this chapter.

10 CFR 55.4 Definitions

Senior operator means any individual licensed under this part to manipulate the controls of a facility and to direct the licensed activities of licensed operators.

SRP-800 Chapter 13.1.2 (Draft Revision 7)
3.C.iii operating Shift Supervisors/managers.

NUREG-0578

"TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations," section 2.2 "Operations."

NUREG-0737 and Supplement 1,
"Clarification of TMI Action Plan Requirements," Items I.A.1.1, "Shift Technical Advisor," and I.A.1.3, "Shift Manning."

NUREG-1791

"Guidance for Assessing Exemption Requests from the Nuclear Power Plant Licensed Operator Staffing Requirements Specified in 10 CFR 50.54(m)".

4.2 Precedent

- 4.2.1 Letter from K. Young (Calloway Plant) to Document Control Desk (NRC), "Proposed Revision to Technical Specification 5.0 'Administrative Controls' (License Amendment Request OL 1267)," dated March 28, 2006 [ML061020060]. Calloway received their SER on July 11, 2006 [ML061250207].

The changes proposed within the Calloway submittal are similar in the change in title for the Shift Supervisor to Shift Manager. Within this submittal Calloway also requested a change to the title for the Health Physics organization that does not apply to VC Summer. Another delta is the Quality Assurance Program in that VC Summer has been approved for NQA-1 (1994) Quality Assurance Requirements for Nuclear Applications. VC Summer has incorporated the administrative control requirements of American National Standards Institute (ANSI) N18.7-1976/American Nuclear Society (ANS) 3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants as endorsed by RG 1.33 revision 2.

4.3 No Significant Hazards Consideration

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes to the Technical Specifications (TS) regarding Shift Supervisor to Shift Manager are administrative changes. It has no impact on accident initiators or plant equipment and thus does not affect the probability or consequences of an accident.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not involve a change to the physical plant or operations. This is an administrative title change that does not contribute to accident initiation. Therefore, it does not produce a new accident scenario or produce a new type of equipment malfunction.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Since the change is administrative and changes no previously evaluated accidents or creates no possibility for any new unevaluated accidents to occur, there is no reduction in the margin of safety. This change also does not affect plant equipment or operation and therefore does not affect safety limits or limiting safety systems settings.

4.4 Conclusions

Based on the above, SCE&G concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

5.0 ENVIRONMENTAL CONSIDERATIONS

SCE&G has determined that this proposed amendment involves no significant hazardous considerations and no significant change in the types of any effluents that may be released off-site and that there is no significant rise in individual or cumulative occupational radiation exposure. Accordingly, this proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environment assessment need be prepared in connection with this amendment.

6.0 REFERENCES

- 6.1 10 CFR 50.36, Technical Specifications
- 6.2 10 CFR 50.54, Conditions of Licenses
- 6.3 10 CFR 55.4, Definitions
- 6.4 ACAD 97-004 Guidelines for Shift Manager Selection, Training and Qualification, and Professional Development
- 6.5 Callaway Plant ULNRC-05267, Proposed Revision to Technical Specification 5.0, "Administrative Controls" (License Amendment Request OL 1267)
- 6.6 Generic Letter 88-06, Removal of Organization Charts from Technical Specification Administrative Control Requirements
- 6.7 NUREG 0578, TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations
- 6.8 NUREG-0800 13.1.2-13.1.3, Standard Review Plan, Operating Organization
- 6.9 NUREG 1431, Section 5.0, "Administrative Controls"
- 6.10 Regulatory Guide 1.8, Qualification and Training of Personnel for Nuclear Power Plants
- 6.11 Regulatory Guide 1.33, Quality Assurance Program Requirements
- 6.12 Regulatory Guide 1.114, Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit

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- 6.13 Safety Evaluation to QAPD, Virgil C. Summer Nuclear Station, Unit 1, Approval of Quality Assurance Program Description
- 6.14 SOER 96-1, Control Room Supervision, Operational Decision-Making, and Teamwork
- 6.15 TSTF-65-A, Improved Standard Technical Specifications Change Traveler
- 6.16 WANO OP.1-1, 2014 WANO Area for Improvement

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Attachment 1

Proposed Technical Specification Change (MARK-UP)

Proposed Technical Specification Changes Summary

Replace the following pages of the Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove Pages</u>	<u>Insert Pages</u>
6-1, 6-2, 6-3, 6-18	6-1, 6-2, 6-3, 6-18

<u>Page</u>	<u>Affected Section</u>	<u>Bar #</u>	<u>Description of Change</u>	<u>Reason for Change</u>
6-1	6.1.2	1	Remove Supervisor and replace with Manager	SOER 96-1
6-2	Table 6.2-1	1	Replace SS with SM	SOER 96-1
6-2	Table 6.2-1	2	Replace SS with SM; Replace Supervisor with Manager	SOER 96-1
6-2	Paragraph 1	3	Remove Supervisor and replace with Manager	SOER 96-1
6-2	Paragraph 2	4	Remove Supervisor and replace with Manager	SOER 96-1
6-3	6.2.4	1	Remove Supervisor and replace with Manager	SOER 96-1
6-18	6.12.2	1	Remove Supervisor and replace with Manager	SOER 96-1

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager, Nuclear Plant Operations shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence. Manager

6.1.2 The Shift ~~Supervisor~~ ^{Manager} shall be responsible for unit operations. A management directive to this effect, signed by the Vice President, Nuclear Operations, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Offsite and Onsite organizations shall be established for unit operation and corporate management, respectively. The offsite and onsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. The organizational charts will be documented in the FSAR and updated in accordance with 10 CFR 50.71(e).
- b. The General Manager, Nuclear Plant Operations, shall be responsible for overall unit safe operation and shall have control over onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President, Nuclear Operations, shall have corporate responsibility for overall plant nuclear safety 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 nuclear safety.
- d. The individuals who train the operating staff and those who carry out the health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

SUMMER UNIT 1

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODES 1, 2, 3, & 4	MODES 5 & 6
SS	1	1
CRF	1	None
RO	2	1
AO	2	1
STA	1	None

SM

Manager

SM

Manager

SS - Shift Supervisor with a Senior Reactor Operators License on Unit 1
 CRF - Control Room Supervisor with a Senior Reactor Operators License on Unit 1
 RO - Individual with a Reactor Operators License on Unit 1
 AO - Auxiliary Operator
 STA - Shift Technical Advisor

Except for the Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 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 of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Control Room Supervisor from the Control Room while the unit is in MODE 1, 2, 3 or 4, an individual (other than the Shift Technical Advisor) with a valid SRO license shall be designated to assume the Control Room command function. During any absence of the Shift Supervisor from the Control Room while the unit is in MODE 5 or 6, an individual with a valid RO or SRO license shall be designated to assume the Control Room command function.

Manager

ADMINISTRATIVE CONTROLS

6.2.3 NOT USED

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide technical support to the Shift ~~Supervisor~~ ^{Manager} in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 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.

6.4 NOT USED

ADMINISTRATIVE CONTROLS

Manager

6.12.2 In addition to the requirements of 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mrem/hr* but less than 500 rads/hr** shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the duty Shift Supervisor and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area. The maximum allowable stay time for individuals in that area shall be established prior to entry. In lieu of the stay time specification of the RWP, direct or remote continuous surveillance (such as closed circuit TV cameras) shall be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

For individual areas accessible to personnel with radiation levels greater than 1000 mrem/hr* but less than 500 rads/hr** that are located within larger areas (such as PWR containment) where no enclosure can be reasonably constructed around the individual areas, then those areas shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained for the duration of the Unit Operating License. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations 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 the PSRC and approval of the General Manager, Nuclear Plant Operations.

* Measurement made at 30 cm (12 in.) from the radiation source or from any surface penetrated by the radiation.

** Measurement made at 1 meter from the radiation source or from any surface penetrated by the radiation.

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Attachment 2

Proposed Technical Specification Change (RETYPE)

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager, Nuclear Plant Operations shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Manager shall be responsible for unit operations. A management directive to this effect, signed by the Vice President, Nuclear Operations, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Offsite and Onsite organizations shall be established for unit operation and corporate management, respectively. The offsite and onsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. The organizational charts will be documented in the FSAR and updated in accordance with 10 CFR 50.71(e).
- b. The General Manager, Nuclear Plant Operations, shall be responsible for overall unit safe operation and shall have control over onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President, Nuclear Operations, shall have corporate responsibility for overall plant nuclear safety 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 nuclear safety.
- d. The individuals who train the operating staff and those who carry out the health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

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TABLE 6.2-1
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SM - Shift Manager with a Senior Reactor Operators License on Unit 1
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Except for the Shift Manager, the Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 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 of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

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ADMINISTRATIVE CONTROLS

6.2.3 NOT USED

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor shall provide technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 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.

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ADMINISTRATIVE CONTROLS

6.12.2 In addition to the requirements of 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mrem/hr* but less than 500 rads/hr** shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the duty Shift Manager and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area. The maximum allowable stay time for individuals in that area shall be established prior to entry. In lieu of the stay time specification of the RWP, direct or remote continuous surveillance (such as closed circuit TV cameras) shall be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

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 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s); and
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Attachment 3

List of Regulatory Commitments

There are no regulatory commitments created due to this License Amendment Request. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Bruce L. Thompson at (803) 931-5042.

Commitment	Due Date
NONE	N/A