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 AUTH. NAME AUTHOR AFFILIATION
 PARKER, W.O. DUKE POWER CO.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. OFFICE OF NUCLEAR REACTOR REGULATION
 REID, R.W. OPERATING REACTORS BRANCH 4

SUBJECT: FORWARDS PROPOSED REVISION TO TECH SPECS RE QUALIFICATIONS
 OF SITE HEALTH PHYSICIST. LICENSE FEES ARE NOT PROVIDED.
 W/AFFIDAVIT.

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DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE: AREA 704
373-4083

March 21, 1979

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. R. W. Reid, Chief
Operating Reactors Branch #4

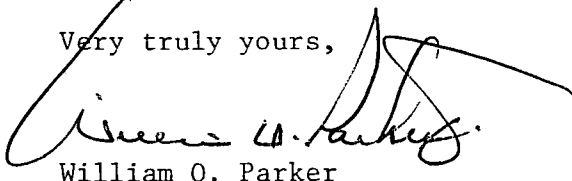
Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

Pursuant to an NRC request, the attached proposed revision to the Oconee Nuclear Station Technical Specification is provided. This proposal concerns the qualifications of the Site Health Physicist (Radiation Protection Manager) and has been the subject of recent discussions with the NRC Staff.

Inasmuch as this proposal is being submitted in response to a written NRC request and pursuant to 10CFR 170, §170.22, (Note 2) no license fees are provided.

Very truly yours,



William O. Parker

RLG:scs
Attachment

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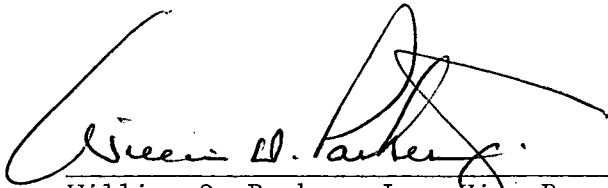
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Mr. Harold R. Denton

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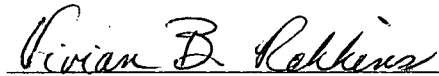
March 21, 1979

WILLIAM O. PARKER, JR., being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this request for amendment of the Oconee Nuclear Station Technical Specifications, Appendix A to Facility Operating Licenses DPR-38, DPR-47 and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



William O. Parker, Jr., Vice President

Subscribed and sworn to before me this 21st day of March, 1979.



Notary Public

My Commission Expires:

February 15, 1982

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, AND AUDIT

6.1.1 Organization

- 6.1.1.1 The station Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.1.2 In all matters pertaining to actual operation and maintenance and to these Technical Specifications, the station Manager shall report to and be directly responsible to the Vice President, Steam Production, through the Manager, Nuclear Production. The organization is shown in Figure 6.1-2.
- 6.1.1.3 The station organization for Operations, Technical Services and Maintenance shall be functionally as shown in Figure 6.1-1. Minimum operating shift requirements are specified in Table 6.1-1.
- 6.1.1.4 Incorporated in the staff of the station shall be personnel meeting the minimum requirements encompassing the training and experience described in Section 4 of ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel" except for the Site Health Physicist.

The Site Health Physicist shall have a bachelor's degree in a science or engineering subject or the equivalent in experience, including some formal training in radiation protection, and shall have at least five years of professional experience in applied radiation protection of which three years shall be in applied radiation protection work in one of Duke Power Company's nuclear stations.

A qualified individual who does not meet the above requirements, but who has demonstrated the required radiation protection management capabilities and has professional experience in applied radiation protection work at one of Duke Power Company's multi-unit nuclear stations, may be appointed to the position of Site Health Physicist by the station Manager, based on the recommendations of the System Health Physicist and as approved by the Manager, Nuclear Production.

- 6.1.1.5 Retraining and replacement of station personnel shall be in accordance with Section 5.5 of ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel."
- 6.1.1.6 A training program for the fire brigade shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions may be held quarterly.

6.1.2 Technical Review and Control

6.1.2.1 Activities

- a. Procedures required by Technical Specification 6.4 and other procedures which affect station nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared by a qualified individual/organization. Each such procedure, or procedure change, shall be reviewed by an individual/group other than the individual/group which prepared the procedure, or procedure change, but who may be from the same organization as the individual/group which prepared the procedure, or procedure change. Such procedures and procedure changes may be approved for temporary use by two members of the station staff, at least one of whom holds a Senior Reactor Operator's License on the unit(s) affected. Procedures and procedure changes shall be approved prior to use or within seven days of receiving temporary approval for use by the station Manager; or by the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent, as previously designated by the station Manager.
- b. Proposed changes to the Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specifications change shall be reviewed by an individual/group other than the individual/group which prepared the proposed change, but who may be from the same organization as the individual/group which prepared the proposed change. Proposed changes to the Technical Specifications shall be approved by the station Manager.
- c. Proposed modifications to station nuclear safety-related structures, systems and components shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to station nuclear safety-related structures, systems and components shall be approved prior to implementation by the station Manager; or by the Operating Superintendent, the Technical Services Superintendent, or the Maintenance Superintendent, as previously designated by the station Manager.
- d. Individuals responsible for reviews performed in accordance with 6.1.2.1.a, 6.1.2.1.b, and 6.1.2.1.c shall be members of the station supervisory staff, previously designated by the station Manager to perform such reviews. Each such review 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 designated station review personnel.
- e. Proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications shall be reviewed by the station Manager; or by the Operating Superintendent, the Technical Services Superintendent or the Maintenance Superintendent, as previously designated by the station Manager.

- f. Incidents reportable pursuant to Technical Specification 6.6.2.1 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the Director of the Nuclear Safety Review Board.
- g. The station Manager shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President, Steam Production.
- h. The station security program, and implementing procedures, shall be reviewed at least annually. Changes determined to be necessary as a result of such review shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the Director of the Nuclear Safety Review Board.
- i. The station emergency plan, and implementing procedures, shall be reviewed at least annually. Changes determined to be necessary as a result of such review shall be approved by the station Manager and transmitted to the Vice President, Steam Production, or his designee; and to the Director of the Nuclear Safety Review Board.
- j. The station manager shall assure that an independent fire protection and loss prevention inspection and audit shall be performed annually utilizing qualified off-site personnel and that an inspection and audit by a qualified fire consultant shall be performed at intervals no greater than three years.

6.1.2.2 Records

Records of the above activities shall be maintained.

6.1.3 Nuclear Safety Review Board

6.1.3.1 Function

The NSRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear Engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Administrative control and quality assurance practices

6.1.3.2 Organization

- a. The Director, members and alternate members of the NSRB shall be formally appointed by the Vice President, Steam Production, and shall have an academic degree in an engineering or physical science field; and in

addition, shall have a minimum of five years technical experience, of which a minimum of three years shall be in one or more areas given in 6.1.3.1.

- b. The NSRB shall be composed of at least five members, including the Director, Members of the NSRB may be from the Steam Production Department, from other departments within the Company or from external to the Company. A maximum of one member of the NSRB may be from the Oconee Nuclear Station staff.
- c. Consultants may be utilized by the NSRB to provide expert advice to the NSRB, as determined necessary by the Director of the NSRB.
- d. Staff assistance may be provided to the NSRB in order to promote the proper, timely and expeditious performance of its functions.
- e. The NSRB shall meet at least once per six months. The period between such meetings shall not exceed eight months.
- f. A quorum of the NSRB shall consist of the Director, or his designated alternate, and at least two other NSRB members or alternate members. No more than a minority of the quorum shall have line responsibility for operation of Oconee Nuclear Station.

6.1.3.3 Subjects Requiring Review

The following subjects shall be reported to and reviewed by the NSRB:

- a. The safety evaluations for (1) changes to procedures, equipment or systems, and (2) tests or experiments completed under the provisions of 10 CFR 50.59(a)(1) to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Proposed changes in Technical Specifications or the Facility Operating Licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of station equipment that affect nuclear safety.
- g. Incidents that are the subject of non-routine reports submitted to the Commission.
- h. Quality Assurance Department audits relating to station operations and actions taken in response to these audits.

6.1.3.4 Audits

Audits of station activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of station operation to provisions contained within the Technical Specifications and applicable facility operating license conditions at least once per year.
- b. The performance, training and qualifications of the station staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in equipment, structures, systems or methods of operation that affect nuclear safety at least once per six months.
- d. The performance of activities required by the quality assurance program to meet the criteria of Appendix B to 10 CFR 50 at least once per two years.
- e. The station emergency plan and implementing procedures at least once per two years.
- f. The station security plan and implementing procedures at least once per two years.
- g. Any other area of station operation considered appropriate by the NSRB or the Vice President, Steam Production.
- h. The station fire protection program and implementing procedures at least once per 24 months.

6.1.3.5 Responsibilities and Authorities

- a. The NSRB shall report to and advise the Vice President, Steam Production on those areas of responsibility specified in Specifications 6.1.3.3 and 6.1.3.4.
- b. Minutes shall be prepared and forwarded to the Vice President, Steam Production, and to the Senior Vice President, Production and Transmission, within 14 days following each formal meeting of the NSRB.
- c. Records of activities performed in accordance with Specifications 6.1.3.3 and 6.1.3.4 shall be maintained.
- d. Audit reports encompassed by Section 6.1.3.4 shall be forwarded to the Vice President, Steam Production, and to the Senior Vice President, Production and Transmission and to the management position responsible for the areas audited within 30 days of completion of each audit.