

Duke Power Company
Oconee Nuclear Station

Attachment 1

Proposed Technical Specification Revision

Pages

6.1-1
6.1-1a
6.1-2
6.1-3
6.1-4
6.1-5
6.1-7
6.1-8
6.2-1
6.3-1

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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, Nuclear Production Department, through the General Manager, Nuclear Stations. 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 Superintendent of Operations and the Operating Engineer.

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 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 General Manager, Nuclear Stations.

The Superintendent of Operations shall have a minimum of eight years of responsible nuclear or fossil station experience, of which a minimum of three years shall be nuclear station experience. A maximum of two years of the remaining five years of experience may be fulfilled by academic training, or related technical training, on a one-for-one time basis. The Superintendent of Operations shall hold or have held a Senior Reactor Operator license.

The Operating Engineer shall have a minimum of eight years of responsible nuclear or fossil station experience, of which a minimum of three years shall be nuclear station experience. A maximum of two

years of the remaining five years of experience may be fulfilled by academic training, or related technical training on a one-for-one time basis. The Operating Engineer shall hold a Senior Reactor Operator license.

- 6.1.1.5 Retraining and replacement of station personnel shall be in accordance with Section 5.5 of the 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.
- 6.1.1.7 The two functions of the Shift Technical Advisor, namely accident assessment and operating experience assessment, are fulfilled in the following manner:

- a. An experienced SRO, who has been instructed in additional academic subjects, will be assigned on-shift to provide the accident assessment capability.
- b. The operating experience assessment function will be provided by the Station Safety Review Group.

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 designated 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, Nuclear Production Department, or his designee, and 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, Nuclear Production Department.
- 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, Nuclear Production Department, or his designee, and 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, Nuclear Production Department, or his designee, and 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, Nuclear Production Department, 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 Nuclear 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 meeting 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.

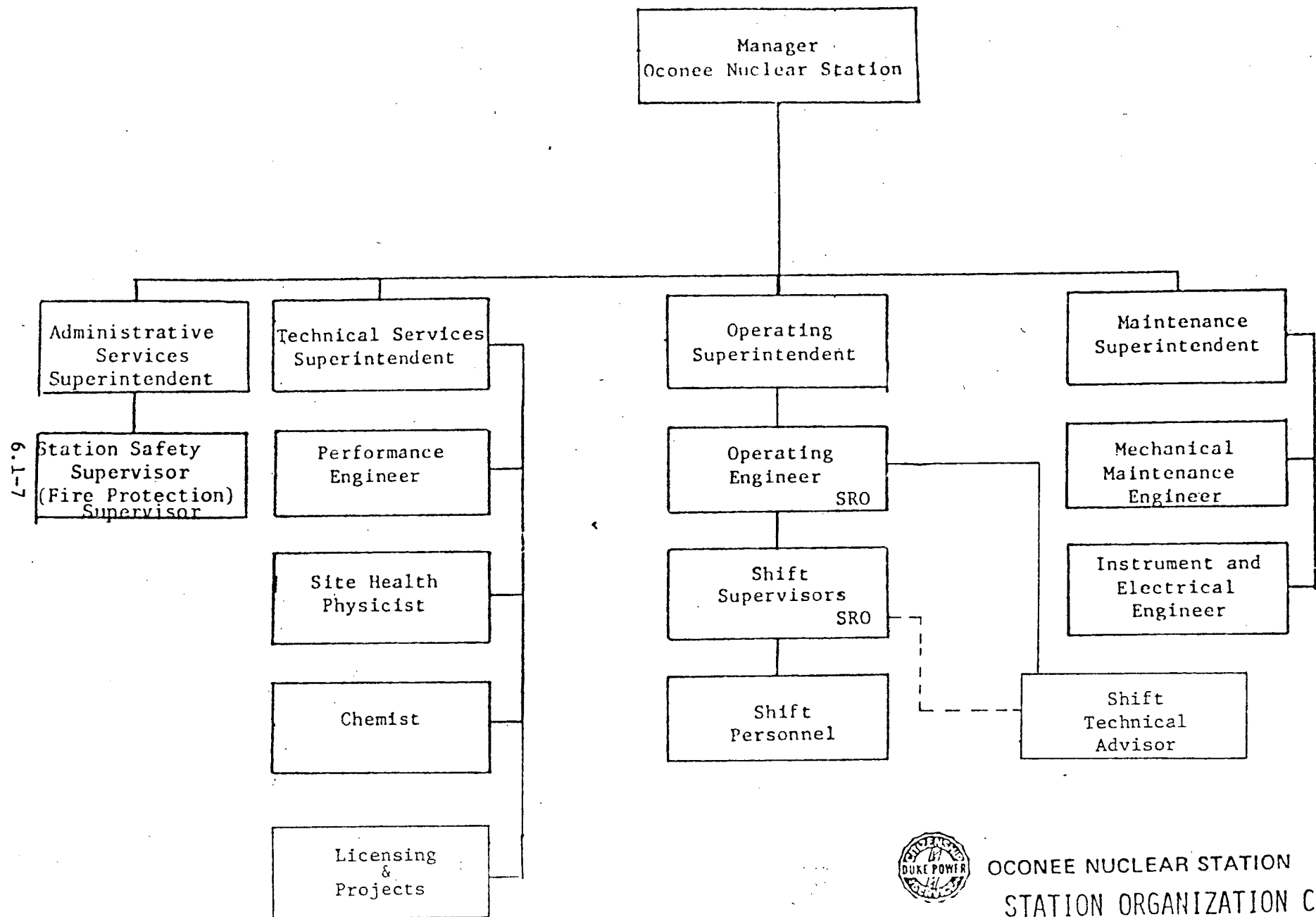
6.1.3.4 Audits

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

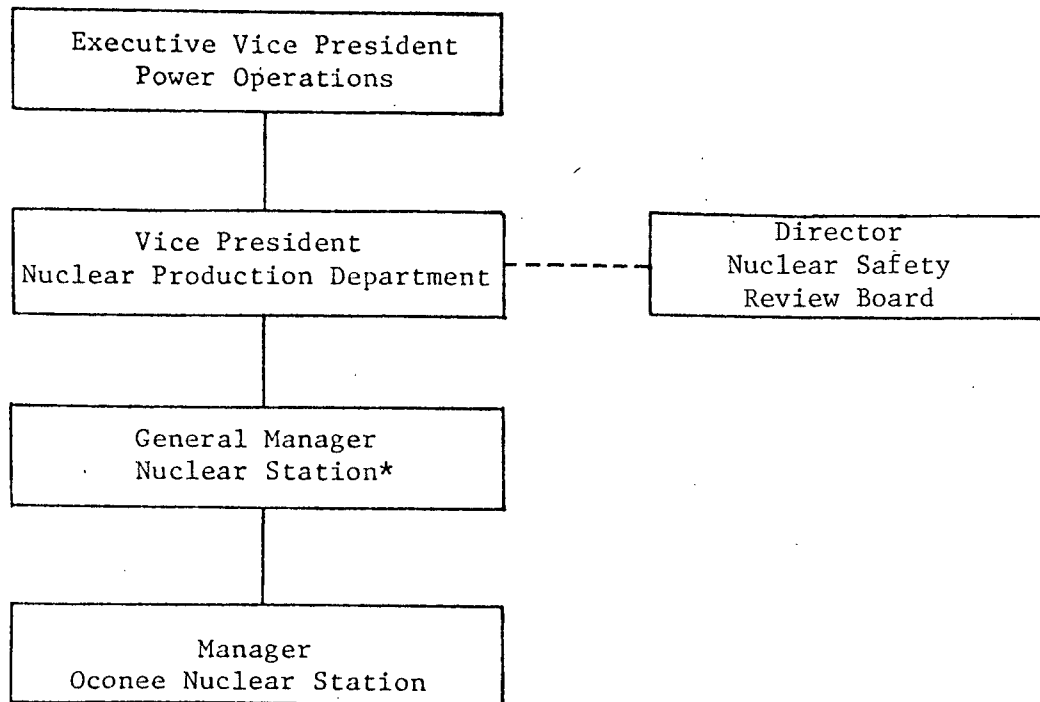
- a. The conformance of station operation to provisions contained within the Technical Specifications and applicable facility operating license conditions at least once per year.
- b. The performance, training and qualifications of the station staff at least once per year.
- c. The results of actions 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, Nuclear Production Department.
- 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, Nuclear Production Department 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, Nuclear Production Department, and to the Executive Vice President, Power Operations, 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, Nuclear Production Department and to the Executive Vice President, Power Operations, and to the management position responsible for the areas audited within 30 days of completion of each unit.



OCONEE NUCLEAR STATION
STATION ORGANIZATION CHART
FIGURE 6.1-1



*Responsible for Fire Protection Program



OCONEE NUCLEAR STATION

MANAGEMENT ORGANIZATION CHART

Figure 6.1-2

6.2 ACTION TO BE TAKEN IN THE EVENT OF A REPORTABLE OCCURRENCE

6.2.1 Any reportable occurrence shall be investigated promptly by the station Manager.

6.2.2 The Vice President, Nuclear Production Department shall be notified of any reportable occurrence. A written report shall be prepared which describes the circumstances leading up to and resulting from the incident and shall recommend appropriate action to prevent or minimize the probability of a recurrence. The report shall be submitted to the Vice President, Nuclear Production Department, and the Director of the Nuclear Safety Review Board.

6.2.3 The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.6.2.

6.3 ACTION TO BE TAKEN IN THE EVENT A SAFETY LIMIT IS EXCEEDED

- 6.3.1 If a safety limit is exceeded, the reactor shall be shut down immediately and maintained in a safe shutdown condition until the Commission authorizes resumption of operation.
- 6.3.2 The violation of a safety limit shall be reported to the Commission, the Vice President, Nuclear Production Department, and the Director of the Nuclear Safety Review Board.
- 6.3.3 - A report shall be prepared which describes (1) applicable circumstances preceding the violation, (2) effects of the violation upon structures, systems or components, and (3) corrective action taken to prevent recurrence. The report shall be reviewed by the Operating Superintendent and the station Manager. The report shall be submitted to the Vice President, Nuclear Production Department, and the Director of the Nuclear Safety Review Board.
- 6.3.4 A report of the violation, with appropriate analyses and corrective action to prevent recurrence shall be submitted to the Commission within 10 days of the violation.

Attachment 2

Duke Power Company Oconee Nuclear Station

Discussion of Proposed Technical Specification Revisions

Specification 6.0 through 6.3

As of August 1, 1982 Duke Power Company will reorganize the Steam Production Department into three separate departments along functional lines: Nuclear Production Department, Fossil Production Department, and Production Support Department. The Nuclear Production Department will be organized as indicated in the diagram which is attached for your information. The changes proposed in the Technical Specifications mainly involve the title changes to be incorporated into the reorganization.

At Oconee Nuclear Station the operating experience assessment per Specification 6.1.1.7 will be performed by the Station Safety Review Group. In essence this change formally names the group of engineers who were designated to provide this function.

Specification 6.1.1.3

The organizational chain with plant operations has been revised in Figure 6.1-1. Under the proposed revision the Shift Supervisors report to an Operating Engineer. The Operating Engineers have the responsibility for directing the actual day-to-day operation of the units. The Operating Engineers report to the Superintendent of Operations who has the responsibility for operation of all Oconee Nuclear Station units. The requirement for the Superintendent of Operations to maintain a Senior Reactor Operator license has been deleted.

Within the multi-unit Oconee Nuclear Station, an Operating Engineer, as the direct supervisor of the Shift Supervisors, will have and maintain a Senior Reactor Operator license. However, the duties of the Superintendent of Operations do not require him to maintain a Senior Reactor Operator license, and the training required to maintain this license actually detracts from time that should be spent in managing the overall operations of the multi-unit Oconee Nuclear Station. This organization chart and the Senior Reactor Operator license requirements will be consistent with other Duke Power Company nuclear stations.

Specification 6.1.1.4

The qualifications for the Superintendent of Operations are the same as the qualifications specified in ANSI/ANS-3.1-1978 (referenced in this specification) except the Superintendent of Operations will not have to maintain a Senior Reactor Operator license. With Operating Engineers responsible for directing the actual day-to-day operation of the units, the duties of the Superintendent of Operations do not require that the Senior Reactor Operator license be maintained and the training required to maintain this license actually detracts from efficient operations management.

The qualifications of the Operating Engineers are the same as the ANSI/ANS-3.1-1978 qualifications listed for the Superintendent of Operations. This is consistent with the duties and responsibilities of the Operating Engineers.

