
**Advanced Passive 1000 (AP1000)
Generic Technical Specification Traveler (GTST)**

Title: Changes Related to Section 5.2, Organization

I. Technical Specifications Task Force (TSTF) Travelers, Approved Since Revision 2 of STS NUREG-1431, and Used to Develop this GTST

TSTF Number and Title:

GTS Subsection 5.2.1: Onsite and Offsite Organizations

TSTF-65-A, Rev.1: Use of generic titles for utility positions (Note: This TSTF applies to WOG STS Rev. 1 - see comment in Section IV of this GTST)

GTS Subsection 5.2.2: Unit Staff

TSTF-511-A, Rev. 0: Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26

STS NUREGs Affected:

TSTF-65-A, Rev. 1: NUREG-1430, -1431, -1432, -1433, -1434

TSTF-511-A, Rev. 0: NUREG-1430, -1431, -1432, -1433, -1434

NRC Approval Date:

TSTF-65-A, Rev. 1: 02-Dec-97

TSTF-511-A, Rev. 0: 30-Dec-08

TSTF Classification:

TSTF-65-A, Rev. 1: Improve Specifications

TSTF-511-A, Rev. 0: Technical Change

II. Reference Combined License (RCOL) Standard Departures (Std. Dep.), RCOL COL Items, and RCOL Plant-Specific Technical Specifications (PTS) Changes Used to Develop this GTST

RCOL Std. Dep. Number and Title:

None

RCOL COL Item Number and Title:

VEGP COL Application, Rev. 3 (Ref. 2):

Bracketed site-specific information in GTS Subsection 5.2.1, Onsite and Offsite Organizations

COL Item 5.2.1.a, regarding the document title “[FSAR/QA Plan]”

COL Item 5.2.1.b, regarding the position title “[Plant Manager]”

Bracketed site-specific information in GTS Subsection 5.2.2, Unit Staff

COL Item 5.2.2, regarding the bracketed Reviewer’s Note

COL Item 5.2.2, regarding the brackets around Specification 5.2.2 paragraphs a, b, c, d, e, and f

RCOL PTS Change Number and Title:

None

III. Comments on Relations Among TSTFs, RCOL Std. Dep., RCOL COL Items, and RCOL PTS Changes

This section discusses the considered changes that are: (1) applicable to operating reactor designs, but not to the AP1000 design; (2) already incorporated in the GTS; or (3) superseded by another change.

GTS Subsection 5.2.2, Unit Staff

TSTF-65-A, Rev. 1, removes the brackets from around the utility staff title “[Plant Manager]” in WOG STS 5.2.1.b, Rev. 1, and changes the title to lower case “plant manager.” This change is also included in WOG STS 5.2.1.b, Rev. 4. GTS 5.2.1.b, Rev. 19, does not include this change. Other changes made by TSTF-65-A, Rev. 1, in WOG STS Section 5.2, Rev. 1, are not discussed in this GTST because they have already been implemented in GTS Section 5.2, Rev. 19.

VEGP COL application Rev. 3 completed COL Item 5.2.1.a by replacing the bracketed document title “[FSAR/QA Plan]” with “FSAR.” Since this change is VEGP-specific, it is not included in TSTF-65-A, GTS 5.2.1.a, or WOG STS 5.2.1.a, Rev. 4. Therefore, AP1000 STS 5.2.1.a, Rev. 0, will also not include this change.

VEGP COL application Rev. 3 completed COL Item 5.2.1.b by replacing the bracketed position title “[Plant Manager]” with lower case “plant manager”; this is a change also made by TSTF-65-A, Rev. 1, to WOG STS 5.2.1.b. However, APOG recommends retaining the brackets associated with the [Plant Manager] title.

GTS Subsection 5.2.2, Unit Staff

TSTF-511-A, Rev. 0, deletes item 5.2.2.d from WOG STS 5.2.2, Rev. 3. Subsequent items are renumbered as shown in WOG STS 5.2.2, Rev. 4. The deleted item deals with the administrative procedures for the working hours of personnel who perform safety related functions. These changes are not included in GTS 5.2.2, Rev. 19.

VEGP COL application Rev. 3 completed COL Item 5.2.2 by not including item 5.2.2.d and renumbering the subsequent items in PTS 5.2.2, Rev. 0.

VEGP COL application Rev. 3 also completed COL Item 5.2.2 by not including the square brackets around the information in GTS 5.2.2, items a, b, c, d, e, and f. This change is consistent with WOG STS 5.2.2, Rev. 4.

These two COL Items also deleted the bracketed “Reviewer’s Note” information at the beginning of section 5.2.2 of the AP1000 GTS Rev. 19.

IV. Additional Changes Proposed as Part of this GTST (modifications proposed by NRC staff and/or clear editorial changes or deviations identified by preparer of GTST)

APOG Recommended Changes to Improve Specification 5.2

Retain the brackets associated with the [Plant Manager] title in section 5.2.1.

Remove the "Reviewer's Note" added under STS 5.2.2.a, Rev. 0.

V. Applicability

Affected Generic Technical Specifications and Bases:

Section 5.2, Organization

Changes to the Generic Technical Specifications and Bases:

GTS Subsection 5.2.1, Onsite and Offsite Organizations

No changes; retain the brackets around “Plant Manager” since it is a GTS COL item which is completed by COL applicants on a plant-specific basis, and thus may vary from site to site. (APOG Comment)

GTS Section 5.2.2, Unit Staff

Delete the bracketed “Reviewer’s Note” below the title of Section 5.2.2. (COL Item 5.2.2 and to match WOG STS 5.2.2, Rev. 4)

Delete item 5.2.2.d and renumber subsequent items. (TSTF-511-A, Rev. 0, change to WOG STS 5.2.2, Rev. 3, COL Item 5.2.2, and to match WOG STS 5.2.2, Rev. 4)

Delete the square brackets around the text in GTS 5.2.2, items a, b, c, d, e, and f. (COL Item 5.2.2 and to match WOG STS 5.2.2, Rev. 4)

VI. Traveler Information

Description of TSTF changes:

GTS Subsection 5.2.1, Onsite and Offsite Organizations

TSTF-65-A, Rev. 1, and COL Item 5.2.1.b, removed the brackets from around the utility staff title “[Plant Manager]” in WOG STS 5.2.1.b, Rev. 1, and VEGP PTS, respectively. The title “Plant Manager” was also changed to lower case “plant manager.” However, based on APOG recommendation, the GTS presentation “[Plant Manager]” is retained in STS Rev. 0.

COL Item 5.2.1.a was completed by replacing the bracketed document title “[FSAR/QA Plan]” with “FSAR.” This change is not included in TSTF-65-A, GTS 5.2.1.a, or WOG STS 5.2.1.a, Rev. 4. Therefore, AP1000 STS 5.2.1.a, Rev. 0, will not include this change.

GTS Subsection 5.2.2, Unit Staff

TSTF-511-A, Rev. 0, deletes item 5.2.2.d from WOG STS 5.2.2, Rev. 3. Subsequent items are renumbered as shown in WOG STS 5.2.2, Rev. 4. The deleted item deals with the administrative procedures for the working hours of personnel who perform safety related functions. Since this change is not included in GTS 5.2.2, but was included in VEGP PTS 5.2.2, it will be implemented by this GTST in AP1000 STS 5.2.2, Rev. 0.

VEGP COL application Rev. 3 also completed COL Item 5.2.2 by not including the square brackets around the information in GTS 5.2.2, items a, b, c, d, e, and f. This change is consistent with WOG STS 5.2.2, Rev. 4.

VEGP COL Item 5.2.2 also deleted the bracketed “Reviewer’s Note” information at the beginning of Subsection 5.2.2 of the AP1000 GTS Rev. 19, because WOG STS 5.2.2, Rev. 4 does not include it.

Rationale for TSTF changes:

GTS Subsection 5.2.1, Onsite and Offsite Organizations

According to TSTF-65-A, Rev. 1, the change of “[Plant Manager]” to “plant manager” in WOG STS 5.2.1.b, Rev. 1 allows the use of generic personnel titles as provided by ANSI/ANS 3.1 in lieu of plant specific personnel titles. This change does not eliminate any of the qualifications, responsibilities, or requirements for the position. In addition, a bracketed “Reviewer’s Note” is placed at the beginning of STS Chapter 5.0, before Section 5.1, detailing the use of the generic titles and title changes. However, since this is a site-specific title, APOG recommended retaining “[Plant Manager]” in AP1000 STS 5.2.1.b, and omitting the Reviewer’s Note, which is not a part of the GTS or RCOL PTS.

GTS Subsection 5.2.2, Unit Staff

TSTF-511-A, Rev. 0 deleted GTS 5.2.2.d. According to this TSTF, "Removal of the plant-specific Technical Specification requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart I, requirements.... Work hour controls and fatigue management requirements have been incorporated into NRC's regulations; therefore, it is unnecessary to have work hour control requirements in the Technical Specifications." Also this TSTF "recommends that the model application for this Traveler contain a commitment for licensees to comply with 10 CFR Part 26 concurrent with the implementation of the Technical Specification change."

Based on TSTF-511-A, Rev. 0, GTS 5.2.2.d is eliminated by this GTST and will not be included in AP1000 STS 5.2.2, Rev. 0.

Description of changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:**GTS Subsection 5.2.1, Onsite and Offsite Organizations**

VEGP COL application Rev. 3 completed COL Item 5.2.1.a by changing the bracketed document title "[FSAR/QA Plan]" to "FSAR." However, staff recommends retaining the GTS presentation of "[FSAR/QA Plan]" because this is a site specific document title.

VEGP COL application Rev. 3 completed COL Item 5.2.1.b by changing the bracketed title from "[Plant Manager]" to lower case un-bracketed title "plant manager." As discussed before, this change is consistent with TSTF-65-A, Rev. 1 and WOG STS 5.2.1.b, Rev. 4. However, APOG recommends retaining the brackets associated with the [Plant Manager] title.

GTS Subsection 5.2.2, Unit Staff

VEGP COL application Rev. 3 completed COL Item 5.2.2 by adopting the changes also made by TSTF-65-A, by deleting item 5.2.2.d from the PTS and by renumbering the subsequent items e and f as d and e.

COL Item 5.2.2 was also completed by deleting the brackets from around GTS Subsection 5.2.2. This deletion is consistent with the text in WOG STS 5.2.2, Rev. 4.

These two COL Items also delete the bracketed "Reviewer's Note" information at the beginning of GTS 5.2.2.

Rationale for changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:**GTS Subsection 5.2.1, Onsite and Offsite Organizations**

The VEGP COL application's justification for replacing "[FSAR/QA Plan]" with "FSAR" to complete COL item 5.2.1.a is that the requirement for the staff and their titles will be documented in the FSAR. However, since this is site-specific information, AP1000 STS 5.2.1.a, Rev. 0, will retain the bracketed document title, consistent with WOG STS 5.2.1.a.

GTS Subsection 5.2.2, Unit Staff

The VEGP COL application's justification for deleting item 5.2.2.d from GTS 5.2.2 and renumbering the subsequent items, to complete COL item 5.2.2, is that the "removal of GTS 5.2.2.d is consistent with TSTF-511 identified by NRC as an appropriate change to implement the revisions to Part 26."

The VEGP COL application's deletion of the brackets from around GTS Subsection 5.2.2 is acceptable because "the generic TS bracketed information is applicable" to AP1000 and is consistent with WOG STS 5.2.2, Rev. 4. Therefore, AP1000 STS 5.2.2, Rev. 0 omits the brackets.

Deleting the bracketed "Reviewer's Note" information at the beginning of GTS Subsection 5.2.2 is consistent with WOG STS 5.2.2, Rev. 4. The VEGP COL application's justification for deleting the "Reviewer's Note" is that this note, as implemented by GTS 5.2.2, is not intended to be a part of plant-specific technical specifications.

Description of additional changes proposed by NRC staff/preparer of GTST:**APOG Recommended Changes to Improve Specification 5.2**

Retain the brackets around the position title "Plant Manager" in Section 5.2.1.b. (APOG Comment)

Remove the "Reviewer's Note" added under section 5.2.2.a. (APOG Comment)

Rationale for additional changes proposed by NRC staff/preparer of GTST:

APOG recommended retaining the brackets associated with the [Plant Manager] title (GTS COL Item 5.2.1.b and TSTF-65-A, Rev. 1 removed the brackets). APOG commented that this GTS COL item should be retained in the AP1000 STS because it is a site specific title.

APOG recommended the removal of the "Reviewer's Note" proposed for Specification 5.2.2.a (even though it exists in WOG STS 5.2.2.a, Rev. 4). The note states, "Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units." APOG commented that the added Reviewer's Note is not associated with any COL Item or bracketed options. Both VEGP Units 3 and 4 and V.C. Summer Units 2 and 3 COL plant-specific TS were issued with no "Reviewer's Note" or change to the content of GTS 5.2.2.a. APOG, therefore, concluded that the note is not applicable to AP1000 STS. Furthermore, APOG commented that adding the "Reviewer's Note" using the argument of consistency with WOG STS Rev. 4 is not an appropriate basis for adding this Reviewer's Note.

VII. GTST Safety Evaluation

Technical Analysis:

GTS Subsection 5.2.1, Onsite and Offsite Organizations

TSTF-65-A, Rev. 1, changed the bracketed staff title in WOG STS 5.2.1.b to improve the STS. The removal of the brackets around the staff title in STS 5.2.1.b allows the use of generic personnel titles, such as “plant manager” as provided by ANSI/ANS 3.1. However, APOG recommended retaining the brackets associated with the [Plant Manager] title, since this title is site specific. Maintaining the GTS provision in AP1000 STS 5.2.1.b is acceptable.

GTS Subsection 5.2.2, Unit Staff

According to TSTF-511-A, Rev. 0, the removal of item 5.2.2.d, which deals with the unit staff working hours, from the WOG STS “will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart I, requirements.... Work hour controls and fatigue management requirements have been incorporated into NRC’s regulations; therefore, it is unnecessary to have work hour control requirements in the Technical Specifications.” Also, this TSTF “recommends that the model application for this Traveler contain a commitment for licensees to comply with 10 CFR Part 26 concurrent with the implementation of the Technical Specification change.” By referencing this TSTF in the VEGP Units 3 and 4 COL application’s information to satisfy COL Item 5.2.2, the VEGP licensee adopted this recommendation. Therefore, omitting item 5.2.2.d from AP1000 STS 5.5.2, Rev. 0, is acceptable.

Omitting the Reviewer’s Note, which states “Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.” from STS Specification 5.2.2.a, even though it is included in WOG STS 5.2.2.a, Rev. 4, is acceptable because it is consistent with GTS 5.5.2.a and the licensing basis for VEGP Units 3 and 4. Proposed AP1000 STS 5.2.2.a would only require two non-licensed operators when both units are shutdown (MODES 5 and 6), one non-licensed operator when one unit is shutdown and one unit is defueled, and no non-licensed operators when both units are defueled. Maintaining the GTS provision in AP1000 STS 5.2.2.a is acceptable.

Having found that this GTST’s proposed changes to the GTS are acceptable, the NRC staff concludes that AP1000 STS Section 5.2 is an acceptable model Specification for the AP1000 standard reactor design.

References to Previous NRC Safety Evaluation Reports (SERs):

None

VIII. Review Information**Evaluator Comments:**

None

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Review Information:

Availability for public review and comment on Revision 0 of this traveler approved by NRC staff on 5/22/2014.

APOG Comments (Ref. 7) and Resolutions:

- 1 (Internal #506) 5.2.1, APOG indicates that the GTST describes the change to the COL Item regarding the position title “[Plant Manager],” which was completed in the VEGP PTS, Rev. 0, by removing the brackets and changing the title to lower case; this is the same as the change made by TSTF-65-A, Rev. 1. However, as APOG indicates this COL Item should not be removed in the AP1000 STS NUREG with disposition as done in VEGP COL. This issue is resolved by retaining the brackets around the position title “Plant Manager.”
- 2 (Internal #507) 5.2.2, Rev. 0 of this GTST proposed adding a “Reviewer's Note” under Section 5.2.2.a, as it exists in WOG STS Rev. 4. The NRC staff notes that the requirement of this Note has been included in NUREG-1431 beginning with Rev. 0 (1992) as Footnote (e) to Table 5.2.2-1, “Minimum Shift Crew Composition [Two Units With Two Control Rooms] (Numbers for Each Unit)” for the auxiliary operator (AO), which is equivalent to “non-licensed operator”; with one unit in Mode 5 or 6, other unit in Mode 5 or 6 or defueled. The AP1000 design review record is unclear why AP1000 GTS 5.2.2.a does not include the Reviewer's Note, or why the WOG STS calls it a “Reviewer's Note” and not just a “Note.” APOG recommended the removal of this “Reviewer's Note” commenting that it is not associated with any GTS COL Item or bracketed options. Both VEGP Units 3 and 4 and V.C. Summer Units 2 and 3 COL plant-specific TS were issued without the “Reviewer's Note” or change to the content of GTS 5.2.2.a. APOG concluded, therefore, that the note is applicable to neither VEGP Units 3 and 4, nor any other AP1000 facility. Furthermore, APOG commented that adding the “Reviewer's Note” using the argument of consistency with WOG STS Rev. 4 is not an appropriate basis for adding the “Reviewer's Note.” Accordingly, this issue is resolved by omitting the “Reviewer's Note” as recommended.
- 3 (Internal #508) 5.2.2.a, APOG recommends inserting the missing introductory sentence for section 5.2.2, “The unit staff organization shall include the following:” This error was inadvertent; therefore, it is resolved by making the recommended change.

Furthermore, APOG and SPSB agreed to revisit how the AP1000 STS should present COL information, bracketed TSTF provisions, and any associated reviewer's notes following completion of STS Rev. 0.

NRC Final Approval Date: 12/14/2015

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IX. Evaluator Comments for Consideration in Finalizing Technical Specifications and Bases

None.

X. References Used in GTST

1. AP1000 DCD, Revision 19, Section 16, "Technical Specifications," June 2011 (ML11171A500).
2. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Technical Specifications Upgrade License Amendment Request, February 24, 2011 (ML12065A057).
3. NRC Safety Evaluation (SE) for Amendment No. 13 to Combined License (COL) No. NPF-91 for Vogtle Electric Generating Plant (VEGP) Unit 3, and Amendment No. 13 to COL No. NPF-92 for VEGP Unit 4, September 9, 2013, ADAMS Package Accession No. ML13238A337, which contains:

ML13238A355	Cover Letter - Issuance of License Amendment No. 13 for Vogtle Units 3 and 4 (LAR 12-002).
ML13238A359	Enclosure 1 - Amendment No. 13 to COL No. NPF-91
ML13239A256	Enclosure 2 - Amendment No. 13 to COL No. NPF-92
ML13239A284	Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13)
ML13239A287	Enclosure 4 - Safety Evaluation (SE), and Attachment 1 - Acronyms
ML13239A288	SE Attachment 2 - Table A - Administrative Changes
ML13239A319	SE Attachment 3 - Table M - More Restrictive Changes
ML13239A333	SE Attachment 4 - Table R - Relocated Specifications
ML13239A331	SE Attachment 5 - Table D - Detail Removed Changes
ML13239A316	SE Attachment 6 - Table L - Less Restrictive Changes

The following documents were subsequently issued to correct an administrative error in Enclosure 3:

- | | |
|-------------|---|
| ML13277A616 | Letter - Correction To The Attachment (Replacement Pages) - Vogtle Electric Generating Plant Units 3 and 4-Issuance of Amendment Re: Technical Specifications Upgrade (LAR 12-002) (TAC No. RP9402) |
| ML13277A637 | Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13) (corrected) |
4. TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," June 2005.
 5. RAI Letter No. 01 Related to License Amendment Request (LAR) 12-002 for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses, September 7, 2012 (ML12251A355).
 6. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Response to Request for Additional Information Letter No. 01 Related to License Amendment Request LAR-12-002, ND-12-2015, October 04, 2012 (ML12286A363 and ML12286A360).

7. APOG-2014-008, APOG (AP1000 Utilities) Comments on AP1000 Standardized Technical Specifications (STS) Generic Technical Specification Travelers (GTSTs), Docket ID NRC-2014-0147, September 22, 2014 (ML14265A493).
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XI. MARKUP of the Applicable GTS Subsection for Preparation of the STS NUREG

The entire section of the Specifications and the Bases associated with this GTST is presented next.

Changes to the Specifications and Bases are denoted as follows: Deleted portions are marked in strikethrough red font, and inserted portions in bold blue font.

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 for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the [FSAR/QA Plan];
- b. The [Plant Manager] shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. A specified corporate officer 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; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operation pressures.

5.2.2 Unit Staff

REVIEWER'S NOTE

~~[Determination of the unit staff positions, numbers, and qualifications are the responsibility of the COL applicant. Input provided in WCAP-14694, Revision 0, for the MCR staff and WCAP-14655, Revision 1, for other than the MCR staff will be used in the determination. Each of the following paragraphs may need to be corrected to specify the plant staffing requirements.]~~

5.2 Organization

5.2.2 Unit Staff (continued)

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODE 1, 2, 3, or 4.
- b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f 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.
- c. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- ~~d. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), health physicists, auxiliary operators, and key maintenance personnel).~~
- ~~— The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~
- ~~— Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.~~
- ~~— Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not be assigned.~~
- de. The operations manager or assistant operations manager shall hold an SRO license.
- ef. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall

5.2 Organization

5.2.2 Unit Staff (continued)

meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

XII. Applicable STS Subsection After Incorporation of this GTST's Modifications

The entire subsection of the Specifications and the Bases associated with this GTST, following incorporation of the modifications, is presented next.

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 for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the [FSAR/QA Plan];
- b. The [Plant Manager] shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. A specified corporate officer 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; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operation pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODE 1, 2, 3, or 4.
- b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty

5.2 Organization

5.2.2 Unit Staff (continued)

shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

- c. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
 - d. The operations manager or assistant operations manager shall hold an SRO license.
 - e. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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