

ATTACHMENT B

Marked Up Copy of R.E. Ginna Nuclear Power Plant  
Technical Specification 6.0

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3.1.4 Maximum Coolant Activity

Specifications

3.1.4.1 Whenever the reactor is critical or the reactor coolant average temperature is greater than 500°F:

a. The total specific activity of the reactor coolant shall not exceed  $84/\bar{E}$   $\mu\text{Ci/gm}$ , where  $\bar{E}$  is the average beta and gamma energies per disintegration in Mev.

b. The I-131 equivalent of the iodine activity in the reactor coolant shall not exceed 0.2  $\mu\text{Ci/gm}$ .

c. The I-131 equivalent of the iodine activity on the secondary side of a steam generator shall not exceed 0.1  $\mu\text{Ci/gm}$ .

3.1.4.2 If the limit of 3.1.4.1.a is exceeded, then be subcritical with reactor coolant average temperature less than 500°F within 8 hours.

3.1.4.3 a. If the I-131 equivalent activity in the reactor coolant exceeds the limit of 3.1.4.1.b but is less than the allowable limit shown on Figure 3.1.4-1, operation may continue for up to 168 hours.

If the I-131 equivalent activity in the reactor coolant exceeds the limit of 3.1.4.1.b for more than 500 hours in any consecutive 6-month period, then prepare and submit a report to the Commission pursuant to Specification 6.9.2.

C.2.i

3.5.5.2 If the setpoint for a radioactive effluent monitor alarm and/or trip is found to be higher than required, one of the following three measures shall be taken immediately:

- (i) the setpoint shall be immediately corrected without declaring the channels inoperable; or
- (ii) immediately suspend the release of effluents monitored by the effected channel; or.
- (iii) declare the channel inoperable.

3.5.5.3 If the number of channels which are operable is found to be less than required, take the action shown in Table 3.5-5. Exert best efforts to return the instruments to OPERABLE status within 31 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.

3.5.6 Control Room HVAC Detection Systems

3.5.6.1 During all modes of plant operation, detection systems for chlorine gas, ammonia gas and radioactivity in the control room HVAC intake shall be operable with setpoints to isolate air intake adjusted as follows:



100

100



100



### Basis:

The reactor coolant system conditions of cold shutdown assure that no steam will be formed and hence there would be no pressure buildup in the containment if the reactor coolant system ruptures.

The shutdown margins are selected based on the type of activities that are being carried out. The (2000 ppm) boron concentration provides shutdown margin which precludes criticality under any circumstances. When the reactor head is not to be removed, a cold shutdown margin of  $1\Delta k/k$  precludes criticality in any occurrence.

Regarding internal pressure limitations, the containment design pressure of 60 psig would not be exceeded if the internal pressure before a major steam break accident were as much as 1 psig.<sup>(1)</sup> The containment is designed to withstand an internal vacuum of 2.5 psig.<sup>(2)</sup> The 2.0 psig vacuum is specified as an operating limit to avoid any difficulties with motor cooling.

C.3.vi In order to minimize containment leakage during a design basis accident involving a significant fission product release, penetrations not required for accident mitigation are provided with isolation boundaries. These isolation boundaries consist of either passive devices or active automatic valves and are listed in a procedure under the control of Technical Specification 6.8. Closed manual valves, deactivated automatic valves secured in their closed position (including check valves with flow through the valve secured), blind flanges and closed systems are considered passive devices. Automatic isolation valves designed to close following an accident without operator action, are considered active devices. Two isolation devices are provided for each mechanical penetration, such that no single credible failure or malfunction of an active component can cause a loss of isolation, or result in a leakage rate that exceeds limits assumed in the safety analyses<sup>(3)</sup>.

In the event that one isolation boundary is inoperable, the affected penetration must be isolated with at least one boundary that is not affected by a single active failure. Isolation boundaries that meet this criterion are a closed and deactivated automatic containment isolation valve, a closed manual valve, or a blind flange.

The opening of closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an individual qualified in accordance with station procedures, who is in constant communication with the control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to isolate the boundary and that this action will prevent the release of radioactivity outside the containment.

*The Quality Assurance Program*

6.9-2 when averaged over any calendar quarter, a Special Report shall be submitted to the Commission within thirty days which includes an evaluation of any release conditions, environmental factors or other aspects which caused the reporting levels of Table 6.9-2 to be exceeded.

When more than one of the radionuclides in Table 6.9-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{concentration (1)}}{\text{limit level (1)}} + \frac{\text{concentration (2)}}{\text{limit level (2)}} + \dots \geq 1.0$$

When radionuclides other than those in Table 6.9-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose to an individual is greater than the calendar year limit of Specifications 3.9.1.2.a or 3.9.2.2.b. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

- 3.16.1.4 If milk or fresh leafy vegetable samples are unavailable for more than one sample period from one or more of the sampling locations indicated by the ODCM, a discussion shall be included in the ~~Semiannual~~ <sup>Release</sup> Radioactive Effluent Report which identifies the cause of the unavailability of samples and identifies locations for

C.2.vii





6.2

ORGANIZATION

6.2.1

Onsite and Offsite Organization

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization 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 management levels through intermediate levels to and including all Plant management positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts. These organization charts will be documented in the UFSAR and updated in accordance with 10CFR50.71.

b. The Senior Vice President, <sup>Customer Operations</sup> ~~Production and Engineering~~, shall have corporate responsibility for overall Plant nuclear safety, and shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the Plant so that continued nuclear safety is assured.

c. The Plant Manager, Ginna Station shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the Plant.

(A.2)

Insert ① →

Insert 1

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- \* An alternate title may be designated for this position in accordance with 10 CFR 50.54(a)(3). All requirements of these Technical Specifications apply to the position with the alternate title as apply with the specified title. Alternate titles shall be specified in the Updated Final Safety Analysis Report.

A-2

- d. The persons responsible for the training, health physics and quality assurance functions may report to an appropriate manager onsite, but shall have direct access to responsible corporate management at a level where action appropriate to the mitigation of training, health physics and quality assurance concerns can be accomplished.

6.2.2 Facility Staff

The Facility organization shall <sup>(include)</sup> ~~be subject to~~ the following:

Insert ② →

(C.2.ii)

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recover from reactor trips caused by transients or emergencies.
- d. All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

- d.e. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.



Insert 2

- (A.3)
- a. An auxiliary operator shall be assigned to the shift crew with fuel in the reactor. An additional auxiliary operator shall be assigned to the shift crew above Cold Shutdown.
  - b. At least one licensed operator shall be present in the control room when fuel is in the reactor. In addition, above Cold Shutdown, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.
  - c. Shift crew composition may be less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 6.2.2.a and 6.2.2.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 shift crew composition to within the minimum requirement.

C.7.V

~~F.~~ (DELETED)

e g. Adequate shift coverage shall be maintained without routine heavy use of overtime. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions including senior reactor operators, reactor operators, health physicists\*, auxiliary operators, and key maintenance personnel. Changes to the guidelines for the administrative procedures shall be submitted to the NRC for review.

A.2

F. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall be assigned to the shift crew above Cold Shutdown.

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Insert 3

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-  \*
- An alternate title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternate title as apply with the specified title. Alternate titles shall be specified in the Updated Final Safety Analysis Report.

Table 6.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	RCS Above Cold Shutdown	Cold Shutdown & Refueling
SS	1	1
SRC	1	None
RO	2	1
AO	2	1
STA	1	None

SS - Shift Supervisor with a Senior Reactor Operators License  
 SRO - Individual with a Senior Reactor Operators License  
 RO - Individual with a Reactor Operators License  
 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 Shift Supervisor from the Control Room while the unit is above Cold Shutdown, 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 Cold Shutdown or Refueling, an individual with a valid SRO or RO license shall be designated to assume the Control Room command function.

6.4

TRAINING

6.4.1

A retraining and replacement training program for the facility staff shall be maintained under the direction of the Division Training Manager<sup>②</sup> and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.

(A.2)

6.4.2

The training program shall meet or exceed NFPA No. 27, 1975 Section 40, except that (1) training for salvage operations need not be provided and (2) the Fire Brigade training sessions shall be held at least quarterly. Drills are considered to be training sessions.

(A.2)

Insert ③ →

6.5

REVIEW AND AUDIT

Three separate organizational units shall be established for the purpose of review and audit of plant operations and safety-related matters. One of these will be an on-site operations review group, the Plant Operations Review Committee (PORC). A second is the Quality Assurance (Q.A.) group, responsible for the audit of safety-related activities associated with plant operations. A third is the independent audit and review group, the Nuclear Safety Audit and Review Board (NSARB). This group is responsible for the periodic review of the activities of the Plant Operations Review Committee, for directing audits and evaluating their results, and for the management evaluation of the status and adequacy of the Quality Assurance program.

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC) FUNCTION

6.5.1.1 The Plant Operations Review Committee shall function to advise the Plant Manager, Ginna Station on all matters related to nuclear safety and for referral of appropriate matters to the Nuclear Safety Audit and Review Board.

6.5 (Deleted)

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### COMPOSITION

6.5.1.2 The PORC shall be composed of the;

Chairman: Superintendent, Ginna Production

Vice Chairman/Member: Superintendent, Ginna Support Services

Vice Chairman/Member: Operations Manager

Member: Maintenance Manager

Member: Maintenance Planning/Scheduling Manager

Member: Instrument & Control Supervisor

Member: Technical Manager

Member: Results and Test Supervisor

Member: Reactor Engineer

Member: Health Physics and Chemistry Manager

Member: Nuclear Assurance Manager

Member: Quality Control Engineer

### ALTERNATES

6.5.1.3 Alternate members shall be designated by name, in writing by the Chairman.

### MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman.

### QUORUM

6.5.1.5 A quorum of the PORC shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two shall be alternates.



## RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager, Ginna Station to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Senior Vice President, Production and Engineering, and to the Chairman of the Nuclear Safety Audit and Review Board.
- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Nuclear Safety Audit and Review Board.

RESPONSIBILITIES (Continued)

- h. Review of the Plant Security Plan and shall submit recommended changes to the Chairman of the Nuclear Safety Audit and Review Board.
- i. Review of the Radiation Emergency Plan and shall submit recommended changes to the Chairman of the Nuclear Safety Audit and Review Board.
- j. Review of implementing procedures for the Plant Security Plan and the Radiation Emergency Plan and proposed changes thereto.
- k. Review of all Reportable Events.
- l. Review of the Fire Protection Program and Implementing Procedures and submittal of recommended Program changes to the Chairman of the Nuclear Safety Audit and Review Board (NSARB).

AUTHORITY

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager, Ginna Station approval or disapproval of items considered under 6.5.1.6(a) through (d) and (1) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (d) and (1) above constitutes an unreviewed safety question as defined in 10 CFR Section 50.59.



- c. Provide immediate written notification to the Senior Vice President, Production and Engineering, and the Nuclear Safety Audit and Review Board of disagreement between the PORC and the Plant Manager, Ginna Station; however, the Plant Manager, Ginna Station shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8

The PORC shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President, Production and Engineering, the Chairman of the Nuclear Safety Audit and Review Board, and such others as the Chairman may designate.

(C.3.iv)

## 6.5.2 NUCLEAR SAFETY AUDIT AND REVIEW BOARD (NSARB)

### FUNCTION:

6.5.2.1 The NSARB 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. quality assurance practices

C.3.iv

### COMPOSITION

6.5.2.2 The composition of the NSARB shall be established as follows:

- a. Chairman and Vice Chairman appointed by name by the Chairman of the Board and Chief Executive Officer of the Corporation or officer of his designation.
- b. At least four technically qualified persons who are not members of the plant staff to provide expertise in the functional areas described in 6.5.2.1.

### COMPOSITION (Continued)

- c. At least one qualified non-company affiliated technical consultant and others as required. Duly appointed consultant members shall have equal vote with company affiliated members of the Board.
- d. Three members from the staff of the B.E. Ginna Nuclear Power Plant.
- e. Members in (b) and (d) above to be designated by the Chairman of the Board and Chief Executive Officer.

### ALTERNATES

6.5.2.3 Alternate members shall be appointed in writing by the NSARB Chairman to serve on a temporary basis; however, no more than two alternates shall participate in NSARB activities at any one time.

### QUALIFICATIONS

6.5.2.4 The minimum qualifications of the Nuclear Safety Audit and Review Board with regard to the individual members shall be maintained at a level equal to or higher than the following:

- a. Reactor Engineering  
Engineering graduate or equivalent with over eight years experience in the nuclear power field and over four years responsible engineering management.

QUALIFICATIONS (Continued)

(b) Utility Operations

Engineering graduate or equivalent with over eight years experience in utility operations and with over four years responsible engineering management.

(c) Reactor Physics

Physics graduate or equivalent with over five years experience in reactor physics work.

(d) Heat and Fluid Flow

Engineering or Physics graduate or equivalent with four years experience in heat and fluid flow analysis.

(e) Environmental Analysis

Engineering graduate or equivalent with over five years experience in environmental hazard analysis.

(f) Reactor Control and Instrumentation

Engineering graduate or equivalent with over five years experience in nuclear engineering.

(g) Power Plant Operations

Engineering graduate or equivalent with over five years experience in power plant operations.

(h) Safety Analysis

Engineering graduate or equivalent with over five years experience in nuclear engineering.

(i) Chemistry and Radiochemistry

Engineering graduate or equivalent with over five years experience in nuclear engineering

(j) Radiological Safety

Engineer graduate or equivalent with over five years experience in health physics and/or radiological safety.

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#### MEETING FREQUENCY

6.5.2.5 At least semi-annually and as required on call of the Chairman.

#### QUORUM

6.5.2.6 A quorum shall consist of a majority of the principals and will include the Chairman or Vice Chairman. At least one of the quorum shall be a non-company affiliated technical consultant and no more than a minority of the quorum shall be members of the Plant staff.

#### REVIEW

6.5.2.7 The NSARB shall review:

- C.3 iv
- a. The safety evaluations for 1) changes to procedures, equipment or systems as described in the safety analysis report and 2) tests or experiments completed under the provision of 10CFR Section 50.59 to verify that such actions did not constitute an unreviewed safety question.
  - b. Proposed changes to procedures, equipment or systems which have been determined by the PORC to involve an unreviewed safety question as defined in 10CFR Section 50.59.
  - c. Proposed tests or experiments which have been determined by the PORC to involve an unreviewed safety question as defined in 10CFR Section 50.59.
  - d. Proposed changes in Technical Specifications or 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 plant equipment that affect nuclear safety.
- g. All Reportable Events.

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### REVIEW (Continued)

- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Plant Operations Review Committee.

### AUDITS

6.5.2.8 The NSARS shall direct the establishment of an audit program and evaluate audits performed to ensure safe facility operation. Audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The performance, training and qualifications of the operating and technical staff at least once a year.
- c. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The performance of all activities required by the Quality Assurance Program for R. E. Ginna Nuclear Power Plant to meet the criteria of Appendix B, 10 CFR 50, at least once per 24 months.
- e. The Radiation Emergency Plan and implementing procedures at least at the frequency required by 10 CFR 50.54(t).
- f. The Station Security Plan and implementing procedures at least at the frequency required by 10 CFR 73.40(d).





AUDITS (Continued)

- g. The Facility Fire Protection Program and implementing procedures at least once per two years.
- h. An independent fire protection and loss prevention program inspection and audit performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program performed by non-licensee personnel at least once per 36 months. The personnel may be representatives of ANI, an insurance brokerage firm, or other qualified individuals.
- j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
- l. The Process Control Program and implementing procedures at least once per 24 months.
- m. Any other area of facility operation considered appropriate by the NSARB or the Senior Vice President, Production and Engineering.

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#### AUTHORITY

- 6.5.2.9 a. The Chairman of the Nuclear Safety Audit and Review Board is responsible to the President on all activities for which the Review Board is responsible.
- b. The NSARB shall report to and advise the Senior Vice President, Production and Engineering, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

#### RECORDS

- 6.5.2.10 Records of NSARB activities shall be prepared, approved, and distributed as indicated below:
- a. Minutes shall be recorded of all meetings of this Board. Copies of the minutes shall be forwarded within 14 days following each meeting to the Corporate Chairman of the Board, Senior Vice President, Production and Engineering and such others as the Chairman of the NSARB may designate.
- b. Reports of reviews encompassed by Section 6.5.2.7 e,f,g and h above shall be prepared, approved and forwarded to the Senior Vice President, Production and Engineering within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President, Production and Engineering and to the management positions responsible for the areas audited within 30 days after completion of the audit.

PROCEDURES

6.5.2.11 Written administrative procedures for committee operation shall be prepared and maintained describing the method of submission and the content of presentations to the committee, provisions for use of subcommittees, review and approval by members of written committee evaluations and recommendations, distribution of minutes, and such other matters as may be appropriate.

6.5.3 QUALITY ASSURANCE GROUP

6.5.3.1 The organization, qualifications, responsibilities and training of quality assurance personnel for audits of safety related activities are described in the Quality Assurance Program.



6.6

REPORTABLE EVENT ACTION

6.6.1

The following actions shall be taken for Reportable Events:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each Reportable Event shall be reviewed by the PORC and the results of this review shall be submitted to the NSARB and the Senior Vice President, Production and Engineering.

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6.6 (Deleted)

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6.7

# SAFETY LIMIT VIOLATION

6.7.1

The following actions shall be taken in the event a Safety Limit is violated:

(A)

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a. The provisions of 10 CFR Section 50.36(c)(1)(i) shall be complied with immediately.

A. 2 -

b. The Safety Limit violation shall be reported to the Customer Operations\* Senior Vice President, Production and Engineering, to the

C. 3. iv

Offsite review function

NSARP, and to the Commission immediately.

NRC

C. 3. iv

c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the onsite review function PORE. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.

C. 3. iv

d. The Safety Limit Violation Report shall be submitted to the NRC Offsite review function the Commission, the NSARP, and the Senior Vice President,

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Production and Engineering within two weeks of the violation.

Customer Operations\*

A. 2

Insert ① →





6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented, and maintained covering the following activities referenced below:

- C.4.v a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972.
- C.1.iv b. Refueling operations. Revision 2, Appendix A, February 1978.
- C.2.iv c. Surveillance and test activities of safety related equipment.
- C.2.v d. Security Plan implementation.
- C.2.v e. Emergency Plan implementation.
- b. f. Fire Protection Program implementation.
- c. g. The radiological environmental monitoring program.
- d. h. Offsite Dose Calculation Manual implementation.
- e. i. Process Control Program implementation.

C.3.vi 6.8.2 Each procedure and administrative policy of 6.8.1 above, the changes thereto, shall be reviewed by the PORC and approved by the Plant Manager, Ginna Station prior to implementation and reviewed periodically as set forth in the applicable procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedures is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom is the Shift Supervisor who holds a Senior Reactor Operator's License.

C.3.vi

c. The change is documented, reviewed by the PORC, and approved by the Plant Manager, Ginna Station within 10 days of implementation.

and directions from the reactor, and the results of the participation in an interlaboratory comparison program.

6.9.1.4 ~~Semiannual~~ Radioactive Effluent Release Report

(A.5) Routine radioactive effluent release reports covering the operation of the unit during the previous ~~six~~ twelve months of operation shall be submitted by May 1 ~~within 60 days~~ after January 1 and July 1 of each year. This report shall include a summary, on a quarterly basis, of the quantities of radioactive liquid and gaseous effluents and solid waste released as outlined in Regulatory Guide 1.21, Revision 1.

(C.2.vii) The radioactive effluent release report submitted within 60 days of January 1 This report shall include an assessment of radiation doses from the radioactive liquid and gaseous effluents released from the unit during each of the previous four calendar quarters as outlined in Regulatory Guide 1.21, Revision 1. In addition, the site boundary maximum noble gas gamma air and beta air doses shall be evaluated. The assessment of radiation doses shall be performed in accordance with the ODCM. This same report shall include an annual summary of hourly meteorological data collected over the previous calendar year. Alternatively, the licensee has the option of retaining this summary on site in a file that shall be provided to the NRC upon request.

Also, the ~~semiannual~~ report shall include any new location(s) identified by the land use census which

6.9.2 Unique Reporting Requirements

6.9.2.1 Annually: Results of required leak test performed on sources if the tests reveal the presence of 0.005 microcurie or more of removable contamination.

6.9.2.2 Annually: A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions, e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions. (NOTE: This tabulation supplements the requirements of Section 20.407 of 10CFR Part 20.)

6.9.2.3 Deleted. Annually: The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.1.4.1.a and b. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit.

C.2.i

C.2.i

~~results of analyses while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include the date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration as a function of time for the duration of the specific activity above the steady-state level, and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.~~

#### 6.9.2.4 Reactor Overpressure Protection System Operation

In the event either the PORVs or the RCS vent(s) are used to mitigate a RCS pressure transient, a Special Report shall be prepared and submitted to the Commission within thirty days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or vent(s) on the transient and any other corrective action necessary to prevent recurrence.

6.9.2.5 ~~Special reports shall be submitted to the Director of the NRC with 10 CFR 50.4 Regional Office listed in Appendix D, 10CFR Part 20, with a copy to the Director, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555 within the time period specified for each report.~~ *in accordance*

C.2.ix



6.10 (Deleted)

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6.10

RECORD RETENTION

In accordance with Rochester Gas and Electric Corporation policy, operating charts for the first year's operation will be permanently stored.

6.10.1

The following records shall be retained for at least five years:

- a. Records and logs of facility operation, including power levels and periods of operation at each power level.
- b. Records and logs of principal maintenance activities, including inspection, repair, substitution or replacement of principal items of equipment pertaining to nuclear safety.
- c. Reportable Event Reports.
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.
- e. Records of reactor tests or experiments.
- f. Records of changes made in the Operating Procedures.
- g. Records of sealed source leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.2

The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report;

C.3.vii

changes shall also be periodically incorporated into the as-built file.

- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of plant radiation and contamination surveys.
- d. Records of off-site environmental monitoring surveys.
- e. Records of radiation exposure of all plant personnel, including all contractors and visitors to the plant who enter radiation control areas.
- f. Records of radioactivity in liquid and gaseous material released to the environmental and radioactive waste shipments.
- g. Records of transient or operational cycles for those facility components designed for limited number of transients or cycles.
- h. Records of training and qualification for current station technical and operations staff members.
- i. Records of in-service inspections performed pursuant to these Technical Specifications.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Section 50.59.
- k. Records of meetings of the PORC and the NSARB.
- l. Records of Quality Assurance activities as required by the QA Manual not listed in 6.10.1.

C.3.vii





m. Records of the service lives of all hydraulic and mechanical snubbers listed in the Inservice Inspection Program including the date at which the service life commences and associated installation and maintenance records.

C. 3.vii

6.11 RADIATION PROTECTION PROGRAM

Radiation control procedures shall be prepared and made available to all station personnel or other persons who may be subject to radiation exposure at the station. These procedures shall show permissible radiation exposure, and shall be consistent with the requirements of 10 CFR Part 20. The radiation protection program shall be organized and maintained to meet the requirements of 10 CFR Part 20, with exceptions set forth in Section 6.13 of these Technical Specifications. The program shall be adhered to for all operations involving personnel radiation exposure.

C.2.x

6.11 (Deleted)

(Intentionally Left Blank)

## 6.13 HIGH RADIATION AREA

### 6.13.1

In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR Part 20:

- A.4
- a. Each High Radiation Area in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by, requiring issuance of a <sup>Radiation</sup> ~~Health Physics~~ Work Permit. \* (RWPP) Any individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

- (1) A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- (2) A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- A.2
- (3) A qualified health physicist<sup>\*\*</sup> (i.e., qualified in radiation protection procedures) with

A.4

A.2

\* <sup>Radiation Protection</sup> ~~Health Physics~~ personnel shall be exempt from the <sup>RWPP</sup> ~~CPWP~~ issuance requirement during the performance of their assigned radiation protection duties, providing they are following plant radiation protection procedures for entry into high radiation areas.

a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and who will perform periodic radiation surveillance at the frequency specified in the HPWP. The surveillance frequency will be established by a plant Health Physicist.\*

(A.2)

- b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1 a. above, and in addition locked doors shall be provided to prevent unauthorized entry into these areas and the keys to unlock these locked doors shall be maintained under the administrative control of the Shift Supervisor on duty.

(A.2)

Insert ③ →



6.15 Offsite Dose Calculation Manual (ODCM)

6.15.1 Any changes to the ODCM shall be made by the following method:

6.15.1.a Licensee initiated changes shall be submitted to the Commission with the C.2.vii ~~Semi-annual~~ Radioactive Effluent Release Report for the period in which the change(s) was made and shall contain:

- (i) sufficiently detailed information to support the rationale for the change.
- (ii) a determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
- (iii) documentation of the fact that the change has been reviewed and found acceptable by the C.3.iv ~~PORC~~.

6.15.1.b Licensee initiated changes shall become effective after review and acceptance by the C.3.iv ~~PORC~~ on a date specified by the licensee.

onsite review function

6.16 Process Control Program (PCP)

6.16.1 Any changes to the PCP shall be made by the following method:

6.16.1.a Licensee initiated changes shall be submitted to the Commission with the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made and shall contain:

- (i) sufficiently detailed information to support the rationale for the change;
- (ii) a determination that the change will not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
- (iii) documentation of the fact that the change has been reviewed and found acceptable by the PORC.

6.16.1.b Licensee initiated changes shall become effective after review and acceptance by the PORC on a date specified by the licensee.

Onsite review function



6.17 Major Changes to Radioactive Waste Treatment Systems  
(Liquid, Gaseous and Solid)

FUNCTION

6.17.1 The radioactive waste treatment systems (liquid, gaseous and solid) are those systems defined in Technical Specification 5.5.

6.17.2 Major changes to the radioactive waste systems (liquid and gaseous) shall be reported by the following method. For the purpose of this specification, "major changes" is defined in Specification 6.17.3 below.

6.17.2.1 The Commission shall be informed of all major changes by the inclusion of a suitable discussion or by reference to a suitable discussion of each change in the Semiannual Radioactive Effluent Release Report for the period in which the changes were made. The discussion of each change shall contain:

- a) a summary of the evaluation that led to the determination that the change could be made (in accordance with 10 CFR 50.59);
- b) sufficient detailed information to support the reason for the change;
- c) a detailed description of the equipment, components and processes involved and the interfaces with other plant systems;

ATTACHMENT C

Proposed Revised R.E. Ginna Nuclear Power Plant  
Technical Specification 6.0

Revise the pages as follows:

<u>Remove</u>	<u>Insert</u>
ii	ii
3.1-21	3.1-21
3.5-2a	3.5-2a
3.6-3	3.6-3
3.16-2	3.16-2
6.2-1	6.2-1
6.2-2	6.2-2
6.2-3	6.2-3
6.2-4	-----
6.4-1	6.4-1
6.5-1	6.5-1
6.5-2	-----
6.5-3	-----
6.5-4	-----
6.5-4a	-----
6.5-5	-----
6.5-6	-----
6.5-7	-----
6.5-8	-----
6.5-8a	-----
6.5-9	-----
6.5-10	-----
6.5-11	-----
6.5-12	-----
6.6-1	6.6-1
6.7-1	6.7-1
6.8-1	6.8-1
6.8-2	-----
6.9-4	6.9-4
6.9-6	6.9-6
6.9-7	6.9-7
6.10-1	6.10-1
6.10-2	-----
6.10-3	-----
6.11-1	6.11-1
6.13-1	6.13-1
6.13-2	6.13-2
6.15-1	6.15-1
6.16-1	6.16-1
6.17-1	6.17-1



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3.1.4 Maximum Coolant Activity

Specifications

3.1.4.1 Whenever the reactor is critical or the reactor coolant average temperature is greater than 500°F:

- a. The total specific activity of the reactor coolant shall not exceed  $84/\bar{E}$   $\mu\text{Ci/gm}$ , where  $\bar{E}$  is the average beta and gamma energies per disintegration in Mev.
- b. The I-131 equivalent of the iodine activity in the reactor coolant shall not exceed 0.2  $\mu\text{Ci/gm}$ .
- c. The I-131 equivalent of the iodine activity on the secondary side of a steam generator shall not exceed 0.1  $\mu\text{Ci/gm}$ .

3.1.4.2 If the limit of 3.1.4.1.a is exceeded, then be subcritical with reactor coolant average temperature less than 500°F within 8 hours.

3.1.4.3 a. If the I-131 equivalent activity in the reactor coolant exceeds the limit of 3.1.4.1.b but is less than the allowable limit shown on Figure 3.1.4-1, operation may continue for up to 168 hours.



3.5.5.2 If the setpoint for a radioactive effluent monitor alarm and/or trip is found to be higher than required, one of the following three measures shall be taken immediately:

- (i) the setpoint shall be immediately corrected without declaring the channels inoperable; or
- (ii) immediately suspend the release of effluents monitored by the effected channel; or
- (iii) declare the channel inoperable.

3.5.5.3 If the number of channels which are operable is found to be less than required, take the action shown in Table 3.5-5. Exert best efforts to return the instruments to OPERABLE status within 31 days and, if unsuccessful, explain in the next Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.

#### 3.5.6 Control Room HVAC Detection Systems

3.5.6.1 During all modes of plant operation, detection systems for chlorine gas, ammonia gas and radioactivity in the control room HVAC intake shall be operable with setpoints to isolate air intake adjusted as follows:





Basis:

The reactor coolant system conditions of cold shutdown assure that no steam will be formed and hence there would be no pressure buildup in the containment if the reactor coolant system ruptures.

The shutdown margins are selected based on the type of activities that are being carried out. The (2000 ppm) boron concentration provides shutdown margin which precludes criticality under any circumstances. When the reactor head is not to be removed, a cold shutdown margin of  $1\Delta k/k$  precludes criticality in any occurrence.

Regarding internal pressure limitations, the containment design pressure of 60 psig would not be exceeded if the internal pressure before a major steam break accident were as much as 1 psig.<sup>(1)</sup> The containment is designed to withstand an internal vacuum of 2.5 psig.<sup>(2)</sup> The 2.0 psig vacuum is specified as an operating limit to avoid any difficulties with motor cooling.

In order to minimize containment leakage during a design basis accident involving a significant fission product release, penetrations not required for accident mitigation are provided with isolation boundaries. These isolation boundaries consist of either passive devices or active automatic valves and are listed in a procedure under the control of the Quality Assurance Program. Closed manual valves, deactivated automatic valves secured in their closed position (including check valves with flow through the valve secured), blind flanges and closed systems are considered passive devices. Automatic isolation valves designed to close following an accident without operator action, are considered active devices. Two isolation devices are provided for each mechanical penetration, such that no single credible failure or malfunction of an active component can cause a loss of isolation, or result in a leakage rate that exceeds limits assumed in the safety analyses<sup>(3)</sup>.

In the event that one isolation boundary is inoperable, the affected penetration must be isolated with at least one boundary that is not affected by a single active failure. Isolation boundaries that meet this criterion are a closed and deactivated automatic containment isolation valve, a closed manual valve, or a blind flange.

The opening of closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an individual qualified in accordance with station procedures, who is in constant communication with the control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to isolate the boundary and that this action will prevent the release of radioactivity outside the containment.



6.9-2 when averaged over any calendar quarter, a Special Report shall be submitted to the Commission within thirty days which includes an evaluation of any release conditions, environmental factors or other aspects which caused the reporting levels of Table 6.9-2 to be exceeded.

When more than one of the radionuclides in Table 6.9-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{concentration (1)}}{\text{limit level (1)}} + \frac{\text{concentration (2)}}{\text{limit level (2)}} + \dots \geq 1.0$$

When radionuclides other than those in Table 6.9-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose to an individual is greater than the calendar year limit of Specifications 3.9.1.2.a or 3.9.2.2.b. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

- 3.16.1.4 If milk or fresh leafy vegetable samples are unavailable for more than one sample period from one or more of the sampling locations indicated by the ODCM, a discussion shall be included in the Radioactive Effluent Release Report which identifies the cause of the unavailability of samples and identifies locations for



6.2

ORGANIZATION

6.2.1

Onsite and Offsite Organization

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization 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 management levels through intermediate levels to and including all Plant management positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts. These organization charts will be documented in the UFSAR and updated in accordance with 10 CFR 50.71.
- b. The Senior Vice President, Customer Operations\*, shall have corporate responsibility for overall Plant nuclear safety, and shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the Plant so that continued nuclear safety is assured.

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\* An alternate title may be designated for this position in accordance with 10 CFR 50.54(a)(3). All requirements of these Technical Specifications apply to the position with the alternate title as apply with the specified title. Alternate titles shall be specified in the Updated Final Safety Analysis Report.



- c. The Plant Manager, Ginna Station shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the Plant.
- d. The persons responsible for the training, health physics and quality assurance functions may report to an appropriate manager onsite, but shall have direct access to responsible corporate management at a level where action appropriate to the mitigation of training, health physics and quality assurance concerns can be accomplished.

#### 6.2.2 Facility Staff

The Facility organization shall include the following:

- a. An auxiliary operator shall be assigned to the shift crew with fuel in the reactor. An additional auxiliary operator shall be assigned to the shift crew above Cold Shutdown.
- b. At least one licensed operator shall be present in the control room when fuel is in the reactor. In addition, above Cold Shutdown, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.
- c. Shift crew composition may be less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 6.2.2.a and 6.2.2.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 shift crew composition to within the minimum requirement.





- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. Adequate shift coverage shall be maintained without routine heavy use of overtime. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions including senior reactor operators, reactor operators, health physicists\*, auxiliary operators, and key maintenance personnel. Changes to the guidelines for the administrative procedures shall be submitted to the NRC for review.
- f. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall be assigned to the shift crew above Cold Shutdown.

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\* An alternate title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternate title as apply with the specified title. Alternate titles shall be specified in the Updated Final Safety Analysis Report.



6.4        TRAINING

- 6.4.1       A retraining and replacement training program for the facility staff shall be maintained under the direction of the Division Training Manager\* and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.
- 6.4.2       The training program shall meet or exceed NFPA No. 27, 1975 Section 40, except that (1) training for salvage operations need not be provided and (2) the Fire Brigade training sessions shall be held at least quarterly. Drills are considered to be training sessions.

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\*        An alternate title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternate title as apply with the specified title. Alternate titles shall be specified in the Updated Final Safety Analysis Report.



6.5 (Deleted)

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Amendment No. 4, 18, 21, 22,  
38, 48, 49

6.5-1

Proposed



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6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i)(A) shall be complied with immediately.
- b. The Safety Limit violation shall be reported to the Senior Vice President, Customer Operations\*, to the offsite review function, and to the NRC immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the onsite review function. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the NRC, the offsite review function, and the Senior Vice President, Customer Operations\* within two weeks of the violation.

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\* An alternate title may be designated for this position in accordance with 10 CFR 50.54(a)(3). All requirements of these Technical Specifications apply to the position with the alternate title as apply with the specified title. Alternate titles shall be specified in the Updated Final Safety Analysis Report.

6.8

PROCEDURES

6.8.1

Written procedures shall be established, implemented, and maintained covering the following activities:

- a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.
- b. Fire Protection Program implementation.
- c. The radiological environmental monitoring program.
- d. Offsite Dose Calculation Manual implementation.
- e. Process Control Program implementation.



and directions from the reactor, and the results of the participation in an interlaboratory comparison program.

6.9.1.4 Radioactive Effluent Release Report

Routine radioactive effluent release reports covering the operation of the unit during the previous twelve months of operation shall be submitted by May 1 of each year. This report shall include a summary, on a quarterly basis, of the quantities of radioactive liquid and gaseous effluents and solid waste released as outlined in Regulatory Guide 1.21, Revision 1.

This report shall include an assessment of radiation doses from the radioactive liquid and gaseous effluents released from the unit during each of the previous four calendar quarters as outlined in Regulatory Guide 1.21, Revision 1. In addition, the site boundary maximum noble gas gamma air and beta air doses shall be evaluated. The assessment of radiation doses shall be performed in accordance with the ODCM. This same report shall include an annual summary of hourly meteorological data collected over the previous calendar year. Alternatively, the licensee has the option of retaining this summary on site in a file that shall be provided to the NRC upon request.

Also, the report shall include any nearby location(s) identified by the land use census which



6.9.2 Unique Reporting Requirements

6.9.2.1 Annually: Results of required leak test performed on sources if the tests reveal the presence of 0.005 microcurie or more of removable contamination.

6.9.2.2 Annually: A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions, e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions. (NOTE: This tabulation supplements the requirements of Section 20.407 of 10CFR Part 20)

6.9.2.3 (Deleted)

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#### 6.9.2.4 Reactor Overpressure Protection System Operation

In the event either the PORVs or the RCS vent(s) are used to mitigate a RCS pressure transient, a Special Report shall be prepared and submitted to the Commission within thirty days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or vent(s) on the transient and any other corrective action necessary to prevent recurrence.



6.10

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Amendment No. 4,70,77

6.10-1

Proposed

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6.13 HIGH RADIATION AREA

6.13.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR Part 20:

a. Each High Radiation Area in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit\* (RWP). Any individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

(1) A radiation monitoring device which continuously indicates the radiation dose rate in the area.

(2) A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

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\* Radiation Protection\*\* personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, providing they are following plant radiation protection procedures for entry into high radiation areas.

\*\* An alternate title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternate title as apply with the specified title. Alternate titles shall be specified in the Updated Final Safety Analysis Report.

(3) A Qualified health physicist\* (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and who will perform periodic radiation surveillance at the frequency specified in the HPWP. The surveillance frequency will be established by a plant Health Physicist\*.

- b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1 a. above, and in addition locked doors shall be provided to prevent unauthorized entry into these areas and the keys to unlock these locked doors shall be maintained under the administrative control of the Shift Supervisor on duty.

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\* An alternate title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternate title as apply with the specified title. Alternate titles shall be specified in the Updated Final Safety Analysis Report.



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6.15 Offsite Dose Calculation Manual (ODCM)

6.15.1 Any changes to the ODCM shall be made by the following method:

6.15.1.a Licensee initiated changes shall be submitted to the Commission with the Radioactive Effluent Release Report for the period in which the change(s) was made and shall contain:

- (i) sufficiently detailed information to support the rationale for the change.
- (ii) a determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
- (iii) documentation of the fact that the change has been reviewed and found acceptable by the onsite review function.

6.15.1.b Licensee initiated changes shall become effective after review and acceptance by the onsite review function on a date specified by the licensee.



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6.16 Process Control Program (PCP)

6.16.1 Any changes to the PCP shall be made by the following method:

6.16.1.a Licensee initiated changes shall be submitted to the Commission with the Radioactive Effluent Release Report for the period in which the change(s) was made and shall contain:

- (i) sufficiently detailed information to support the rationale for the change;
- (ii) a determination that the change will not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
- (iii) documentation of the fact that the change has been reviewed and found acceptable by the onsite review function.

6.16.1.b Licensee initiated changes shall become effective after review and acceptance by the onsite review function on a date specified by the licensee.

6.17 Major Changes to Radioactive Waste Treatment Systems  
(Liquid, Gaseous and Solid)

FUNCTION

- 6.17.1 The radioactive waste treatment systems (liquid, gaseous and solid) are those systems defined in Technical Specification 5.5.
- 6.17.2 Major changes to the radioactive waste systems (liquid and gaseous) shall be reported by the following method. For the purpose of this specification, "major changes" is defined in Specification 6.17.3 below.
- 6.17.2.1 The Commission shall be informed of all major changes by the inclusion of a suitable discussion or by reference to a suitable discussion of each change in the Radioactive Effluent Release Report for the period in which the changes were made. The discussion of each change shall contain:
- a) a summary of the evaluation that led to the determination that the change could be made (in accordance with 10 CFR 50.59);
  - b) sufficient detailed information to support the reason for the change;
  - c) a detailed description of the equipment, components and processes involved and the interfaces with other plant systems;

