REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
SECTION 6.0 ADMINISTRATIVE CONTROLS - SUPPLEMENTAL INFORMATION

Attachment 3

TECHNICAL SPECIFICATION PAGES

WITH PROPOSED CHANGES INDICATED

Attachment 3

INSERT A

The POC shall be composed of individuals with expertise in each of the following functional areas:

Operations	Administrative Services
Maintenance	Radiation Protection
Engineering	Chemistry
Quality	Planning/Scheduling/Outage

The Plant General Manager shall appoint, in writing, the POC Chairman, Vice Chairman, and members.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.1.2 The Shift Manager (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the ~~Assistant Managing Director for Operations~~ Chief Executive Officer shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE 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 the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions. These requirements are documented in the WNP-2 FSAR and updated in accordance with 10 CFR 50.71.

b. The Plant General Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The ~~Assistant Managing Director for Operations~~ Chief Executive 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.

d. The individuals who train the operating staff and those who carry out health physics and quality functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

e. ~~The organization responsible for the overall quality assurance functions shall report to the Assistant Managing Director, Operations.~~

6.2.2 UNIT STAFF

a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;

UNIT STAFF (continued)

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

General Any deviation from the above guidelines shall be authorized by the Plant Manager or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly General by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. The Shift Managers and Control Room Supervisors shall hold a senior reactor operator license. In addition, the Operations Manager or the Assistant Operations Manager shall also hold a senior reactor operator license. The Reactor Operators shall hold either a senior reactor operator license or a reactor operator license.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained to meet or exceed the requirements and recommendations of Section 5.5 of ANSI/ANS N18.1-1971 and ~~Appendix A of~~ 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS COMMITTEE (POC)

FUNCTION

6.5.1.1 The POC shall function to advise the Plant General Manager on all matters related to nuclear safety.

COMPOSITION

Replace with Insert A

6.5.1.2 ~~The POC shall be composed of the:~~

~~Chairman: Plant Manager~~
~~Vice Chairman: As designated from the POC Members by the Plant Manager and documented in the POC minutes.~~
~~Member: Operations Division Manager~~
~~Member: Radiation Protection Manager~~
~~Member: Technical Services Division Manager~~
~~Member: Maintenance Division Manager~~
~~Member: Administration and Records Management Manager~~
~~Member: Quality Assessments Division Manager~~
~~Member: Engineering Services Division Manager~~

ALTERNATES

6.5.1.3 ~~All~~ POC alternate members shall be appointed in writing by the ~~POC Chairman or Vice Chairman~~ Plant General Manager to serve on a temporary basis.

MEETING FREQUENCY

6.5.1.4 The Plant Operations Committee shall meet at least once per calendar month and as convened by the POC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the POC necessary for the performance of the POC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two alternates shall make up the quorum.

RESPONSIBILITIES

6.5.1.6 The POC shall be responsible for:

a. Review of (1) all proposed procedures required by Specification 6.8 and changes thereto, (2) all proposed programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Plant General Manager to affect nuclear safety;

b. Review of all proposed tests and experiments that affect nuclear safety;

c. Review of all proposed changes to the Appendix A Technical Specifications;

d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;

e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the ~~Assistant Managing Director for Operations~~ Chief Executive Officer and to the Corporate Nuclear Safety Review Board;

f. Review of all REPORTABLE EVENTS;

g. Review of unit operations to detect potential hazards to nuclear safety;

h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Corporate Nuclear Safety Review Board;

i. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Corporate Nuclear Safety Review Board;

j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Corporate Nuclear Safety Review Board;

k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the ~~Assistant Managing Director for Operations~~ Chief Executive Officer and to the Corporate Nuclear Safety Review Board; and

l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

6.5.1.7 The POC shall:

a. Recommend in writing to the Plant General Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.

AUTHORITY (Continued)

b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6a. through e. constitutes an unreviewed safety question as defined in 10 CFR 50.59.

c. Provide written notification within 24 hours to the Chief Executive Officer ~~Assistant Managing Director for Operations~~ and the Corporate Nuclear Safety Review Board of disagreement between the POC and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The POC shall maintain written minutes of each POC meeting that, at a minimum, document the results of all POC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the ~~Assistant Managing Director for Operations~~ Chief Executive Officer and the Corporate Nuclear Safety Review Board.

6.5.2 CORPORATE NUCLEAR SAFETY REVIEW BOARD (CNSRB)

FUNCTION

6.5.2.1 The CNSRB 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, and

h. Quality assurance practices.

The CNSRB shall report to and advise the Chief Executive Officer ~~Assistant Managing Director for Operations~~ on those areas of responsibility in Specifications 6.5.2.7 and 6.5.2.8.

COMPOSITION

6.5.2.2 The CNSRB shall be composed of nine members appointed in writing by the ~~Assistant Managing Director, Operations~~ Chief Executive Officer from his senior technical staff and/or from outside the Supply System. He shall designate from the members a Chairman and an Alternate Chairman. The qualifications of all members shall meet the minimum requirements of Section 4.7 of ANSI/ANS 3.1-1981 and have, cumulatively, expertise in the areas listed in Specification 6.5.2.1, as a minimum.

ALTERNATES

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

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the CNSRB Committee to provide expert advice to the CNSRB.

MEETING FREQUENCY

6.5.2.5 The CNSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the CNSRB necessary for the performance of the CNSRB review and audit functions of these Technical Specifications shall consist of the Chairman or the alternate Chairman and at least four CNSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.2.7 The CNSRB shall review:

a. The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;

b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;

AUDITS (Continued)

h. The fire protection equipment and program implementation, at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least once every third year; and

i. Any other area of unit operation considered appropriate by the CNSRB or the ~~Assistant Managing Director for Operations~~. Chief Executive Officer

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 for processing and packaging of radioactive wastes at least once per 24 months.

m. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

RECORDS

6.5.2.9 Records of CNSRB activities shall be prepared, approved, and distributed as indicated below:

a. Minutes of each CNSRB meeting shall be prepared, approved, and forwarded to the ~~Assistant Managing Director for Operations~~ Chief Executive Officer 14 days following each meeting.

b. Reports of reviews encompassed by Specification 6.5.2.7 above, shall be prepared, approved, and forwarded to the ~~Assistant Managing Director for Operations~~ Chief Executive Officer within 14 days following completion of the review.

c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Chief Executive Officer ~~Assistant Managing Director for Operations~~ and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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 (POC), and the results of this review shall be submitted to the CNSRB and the ~~Assistant Managing Director for Operations~~. Chief Executive Officer

6.7 SAFETY LIMIT VIOLATION

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

a. The NRC Operations Center shall be notified by Chief Executive Officer telephone as soon as possible and in all cases within 1 hour. The ~~Assistant Managing Director for Operations~~ and the CNSRB shall be notified.

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

c. The Safety Limit Violation Report shall be submitted to the Commission, the CNSRB, and the ~~Assistant Managing Director for Operations.~~ Chief Executive Officer

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

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

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

b. The applicable procedures required to implement the requirements of NUREG-0737.

c. Refueling operations.

d. Surveillance and test activities of safety-related equipment.

e. Security Plan implementation.

f. Emergency Plan implementation.

g. Fire Protection Program implementation.

h. PROCESS CONTROL PROGRAM implementation.

i. OFFSITE DOSE CALCULATION MANUAL implementation.

j. Quality Assurance Program for effluent and environmental monitoring.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed by the POC and shall be approved by the Plant General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

PROCEDURES AND PROGRAMS (Continued)

6.8.3 Temporary changes to procedures of Specification 6.8.1a. through j. may be made provided:

a. The intent of the original procedure is not altered;

b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and

c. The change is documented, reviewed by the POC, and approved by the Plant General Manager within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the LPCS, HPCS, RHR, RCIC, hydrogen recombiner, process sampling, containment, and the standby gas treatment systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and

2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,

2. Procedures for sampling and analysis, and

3. Provisions for maintenance of sampling and analysis equipment.

HIGH RADIATION AREA (Continued)

where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote (such as use of closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

Licensee-initiated changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:

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

   2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State or other applicable regulations.

b. Shall become effective after review and acceptance by the POC and the approval of the Plant General Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:

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

   2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.

b. Shall become effective after review and acceptance by the POC and the approval of the Plant General Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any changes to the ODCM were made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.