

ADMINISTRATIVE CONTROLS

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT (Continued)

- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent or absorbent (e.g., cement, urea formaldehyde).

The Semiannual Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Semiannual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM and to the OFFSITE DOSE CALCULATION MANUAL, as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

SEE INSERT B

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE EVENTS submitted to the Commission.
- d. Records of surveillance activities; inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures of Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

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SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT (Continued)

The Semiannual Radioactive Effluent Release Report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1, October 1977.

The Semiannual Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

- a. Container volume,
- b. Total curie quantity (specify whether determined by measurement or estimate),
- c. Principal radionuclides (specify whether determined by measurement or estimate),
- d. Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent or absorbent (e.g., cement, urea formaldehyde).

The Semiannual Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Semiannual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM and to the OFFSITE DOSE CALCULATION MANUAL, as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

SEE INSERT B

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

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6.9.3 Violations of the requirements of the fire protection program described in the Final Safety Analysis Report which would have adversely affected the ability to achieve and maintain safe shutdown in the event of a fire shall be reported in accordance with 10CFR50.73.

(6) Environmental Qualification (Section 3.11, SSER 7 and SSER 8)

- ✓ Prior to November 30, 1985, APS shall environmentally qualify all electrical equipment according to the provisions of 10 CFR 50.49.

(7) Fire Protection Program (Section 9.5.1, SSER 6, SSER 7, and SSER 8)

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- (a) APS shall maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility through Amendment No. 14, and as provided in the SER through Supplement 8, subject to provisions (b) & (c) below.
- (b) APS may make no change in features of the approved fire protection program which would decrease the level of fire protection in the plant without prior approval of the Commission. To make such a change APS must submit an application for license amendment pursuant to 10 CFR 50.90.
- (c) APS may make changes to features of the approved fire protection program which do not decrease the level of fire protection without prior Commission approval, provided:
- (i) such changes do not otherwise involve a change in a license condition or technical specification or result in an unreviewed safety question (see 10 CFR 50.59), and
 - (ii) such changes do not result in failure to carry out the fire protection program approved by the Commission prior to license issuance.

APS shall maintain, in an auditable form, a current record of all such changes including an analysis of the effects of the change on the fire protection program and shall make such records available to NRC inspectors upon request. All changes to the approved program made without prior Commission approval shall be reported annually to the Director of the Office of Nuclear Reactor Regulation, together with supporting analyses.

(8) Emergency Preparedness

- ✓ In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of preparedness, the provisions of 10 CFR Section 50.54(s)(2) will apply.

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APS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, as supplemented and amended, and as approved in the SER through Supplement 8, subject to the following provision:

APS may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

H. Station Security Procedures

Station security procedures provide for the implementation of the Security Plan (refer to section 13.6).

I. Fire Protection Procedures

Fire protection procedures are provided to instruct applicable station personnel in methods of fire prevention, fire fighting, and maintenance of fire protection equipment. Procedures provide specific instructions to members of the fire team in fire fighting techniques.

In addition to the above, limiting conditions for operation, action statements and surveillance requirements for the Fire Protection program will be established within PVNGS Station Manual. This will provide an equivalent level of protection as described in the following sections of the Combustion Engineering Standard Technical Specifications:

Section 3/4.3 - Instrumentation

Specification 3.3.3.7 - Fire Detection Instrumentation
(limiting conditions of operation, surveillance requirements)

Section 3/4.7 - Plant Systems

Specification 3.7.11.1 - Fire Suppression Water System
(limiting conditions of operation, surveillance requirements)

Specification 3.7.11.2 - Spray and/or Sprinkler System
(limiting conditions of operation, surveillance requirements)

Specification 3.7.11.3 - CO₂ Systems
(limiting conditions of operation, surveillance requirements)

Specification 3.7.11.4 - Fire Hose Station
(limiting conditions of operation, surveillance requirements)

Specification 3.7.11.5 - Yard Fire Hydrant and Hydrant Hose Houses
(limiting conditions of operation, surveillance requirements)

Specification 3.7.11.6 - Halon Systems
(limiting conditions of operation, surveillance requirements)

Specification 3.7.12 - Fire Rated Assemblies
(limiting conditions of operation, surveillance requirements)