

ATTACHMENT 2 TO AEP:NRC:0659X

**EXISTING TECHNICAL  
SPECIFICATION PAGES  
MARKED TO REFLECT  
PROPOSED CHANGES**

## ADMINISTRATIVE CONTROLS

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Superintendent, who must hold or have held a Senior Operator License as specified in Section 6.2.2.h.

### 6.4. TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the 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.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT NUCLEAR SAFETY REVIEW COMMITTEE (PNSRC)

##### FUNCTION

6.5.1.1 The PNSRC shall function to advise the <sup>Site Vice President / or designee,</sup> Plant Manager, on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The PNSRC shall be composed of Assistant Plant Managers, Department Superintendents, or supervisory personnel reporting directly to the <sup>Site Vice President /</sup> Plant Manager, Assistant Plant Managers or Department Superintendents, ~~from the functional areas listed below:~~ The membership shall represent the functional areas of the plant including, but not limited to, Operations, Technical Support, Licensing, Maintenance and Radiation Protection, ~~Licensing Activities, Technical Support, Safety & Assessment, Radiation Protection, Operations, Maintenance~~

~~The PNSRC membership shall consist of at least one individual from each of the areas designated. All members, including the Chairman and his alternates, the members and their alternates, The Chairman, his alternate and other members and their alternates of the PNSRC shall be designated by the Plant Manager. In addition to the Chairman, the PNSRC membership shall consist of one individual from each of the areas designated above.~~  
<sup>Site Vice President /</sup>

PNSRC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 of ANSI N18.1-1971 except for the requirement to hold a current Senior Operator License. The operations individual must hold or have held a Senior Operator License at Cook Nuclear Plant or a similar reactor. The maintenance individual shall meet the qualifications of Section 4.2.3 of ANSI N18.1-1971.

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- h. Performance of special reviews, investigations of analyses and reports thereon as requested by the Chairman of the NSDRG.
- ~~i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the NSDRG.~~
- ~~j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the NSDRG.~~
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluations, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Nuclear Operations and to the NSDRG.
- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment system.

## AUTHORITY

6.5.1.7 The PNSRC shall:

- a. Recommend to the <sup>Site Vice President/</sup>Plant Manager written approval or disapproval of items considered under 6.5.1.6 (a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (c) and (e) above constitutes an unreviewed safety question.
- c. Provide written notification, within 24 hours to the <sup>Senior</sup>Vice President - Nuclear Operations and the NSDRG of disagreement between the PNSRC and the <sup>General</sup>Plant Manager; however, the <sup>Site Vice President/</sup>Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

## RECORDS

6.5.1.8 The PNSRC shall maintain written minutes of each meeting and copies shall be provided to the Chairman of the NSDRG.

## 6.5.2 NUCLEAR SAFETY AND DESIGN REVIEW COMMITTEE (NSDRG)

### FUNCTION

6.5.2.1 The NSDRG shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering

## ADMINISTRATIVE CONTROLS

- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

## COMPOSITION

6.5.2.2 The NSDRC shall be composed of the following regular members:

1. <sup>Senior</sup> Vice President - Nuclear <sup>Generation</sup> ~~Operations~~ (NSDRC Chairman)
2. ~~Group Manager, Nuclear Safety, Licensing & Assessment - Nuclear~~ <sup>Fuel Division</sup> ~~Operations~~ (NSDRC Secretary)
3. <sup>Site Vice President</sup> Plant Manager - Donald C. Cook Nuclear Plant
4. ~~Executive Assistant to the President~~ <sup>Vice President</sup> - Indiana Michigan Power Company
5. <sup>Executive</sup> ~~Senior Vice President and Chief Engineer~~ Engineering and Construction
6. ~~Vice President and Chief Electrical Engineer~~ Transmission and Distribution Services
7. <sup>Senior</sup> ~~Vice President - Project Management and Construction~~ Fossil and Hydro Generation
8. ~~Chief Nuclear Engineer Manager - Nuclear Engineering Department~~
9. ~~Assistant Vice President - Civil Engineering~~
10. <sup>Manager - Nuclear Plant Engineering Support Division</sup> ~~Assistant Vice President - Design~~
11. <sup>Manager</sup> ~~Division Manager - Nuclear Support Services Department~~
12. <sup>Manager</sup> ~~Director - Environmental and Technical Assessment~~
13. <sup>Manager</sup> ~~Director - Quality Assurance Department~~
14. ~~Manager, Plans and Programs - Nuclear Operations~~ Production Support and Administrative Services Section

Additional members and Vice Chairman may be appointed by the President and Chief Operating Officer.

## ALTERNATE MEMBERS

6.5.2.3 Designated alternate members shall be appointed by the President and Chief Operating Officer or such other person as he shall designate. In addition, temporary alternate members may be appointed by the NSDRC Chairman to serve on an interim basis, as required. Temporary alternate members are empowered to act on the behalf of the regular or designated alternate members for whom they substitute.

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- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications 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 PNSRC.

## AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NSDRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- ~~e. The Facility Emergency Plan and implementing procedures at least once per 12 months.~~
- ~~f. The Facility Security Plan and implementing procedures at least once per 12 months.~~
- g. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
- h. The fire protection equipment and program implementation at least once per 12 months using either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- i. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.

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shall be approved by the appropriate department head as previously designated in writing by the <sup>Site Vice President</sup> Plant Manager, <sup>Site Vice President</sup> The Plant Manager, or designee, shall approve Security Plan implementing procedures, Emergency Plan implementing procedures and Plant Manager Procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the <sup>Site Vice President</sup> Plant Manager, or designee. Each such modification shall be reviewed (reference T/S 6.5.3.1.e) by a qualified (reference T/S 6.5.3.1.d) individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the <sup>Site Vice President</sup> Plant Manager, or designee.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by qualified individuals/groups other than the individual/group which prepared the proposed test or experiment to assure cross-disciplinary review as appropriate for the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the <sup>Site Vice President</sup> Plant Manager, or designee.
- d. Individuals who conducted the reviews performed in accordance with Specification 6.5.3.1a, 6.5.3.1b, and 6.5.3.1c, shall be members of the plant management staff previously designated by the <sup>Site Vice President</sup> Plant Manager and shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved: Pursuant to 10.CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to the <sup>Site Vice President</sup> Plant Manager, or designee, approval for implementation.

~~f. The Emergency Plan and implementing procedures shall be reviewed at least once per 12 months. Recommended changes to the~~

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~~plan and implementing procedures shall be reviewed pursuant to the requirements of Specifications 6.5.1.6 and 6.5.2.7 and approved by the Plant Manager. NRC approval shall be obtained as appropriate.~~

- g. ~~Recommended changes to the Security Plan and implementing procedures shall be reviewed pursuant to the requirements of Specifications 6.5.1.6 and 6.5.2.7 and approved by the Plant Manager. NRC approval shall be obtained as appropriate.~~

6.5.3.2 Records of the above activities shall be provided to the <sup>site Vice President</sup> Plant Manager, PNSRC and/or the NSDRG as necessary for required reviews.  
or designee,

## 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 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the PNSRC, and the results of this review shall be submitted to the NSDRG and the Senior Vice President - Nuclear Operations, Generation,

## 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 telephone as soon as possible and in all cases within 1 hour. The Chairman of the NSDRG shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSRC. 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. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the NSDRG and the <sup>Senior Vice President - Nuclear Operations, Generation</sup> Vice President within 14 days of the violation.
- d. 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:

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- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
- ~~b. Security Plan implementation.~~
- ~~c. Emergency Plan implementation.~~
- d. PROCESS CONTROL PROGRAM implementation.
- e. OFFSITE DOSE CALCULATION MANUAL implementation.
- f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 A plant program for post-accident sampling shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant samples, containment atmosphere noble gas samples, and unit vent gaseous effluent samples for iodines and particulates under accident conditions. The program will include the following:

- a. Training of personnel,
- b. Procedures for sampling and analysis,
- c. Provisions for maintenance of sampling and analysis equipment.

## 6.9 REPORTING REQUIREMENTS

### ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator unless otherwise noted.

### STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

## ADMINISTRATIVE CONTROLS

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Superintendent, who must hold or have held a Senior Operator License as specified in Section 6.2.2.h.

### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the 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.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT NUCLEAR SAFETY REVIEW COMMITTEE (PNSRC)

##### FUNCTION

6.5.1.1 The PNSRC shall function to advise the Plant Manager on all matters related to nuclear safety. *Site Vice President/*

##### COMPOSITION

6.5.1.2 The PNSRC shall be composed of Assistant Plant Managers, Department Superintendents, or supervisory personnel reporting directly to the Plant Manager, Assistant Plant Managers or Department Superintendents, *Site Vice President/* ~~from the functional areas listed below.~~ The membership shall represent the functional areas of the plant, including, but not limited to, Operations, Technical Support, Licensing, Maintenance and Radiation Protection.

~~Licensing Activities~~

~~Technical Support~~

~~Safety & Assessment~~

~~Radiation Protection~~

~~Operations~~

~~Maintenance~~

*The PNSRC membership shall consist of at least one individual from each of the areas designated. All members, including the Chairman and his alternates, the members and their alternates,*

*The Chairman, his alternate and other members and their alternates of the PNSRC shall be designated by the Plant Manager. In addition to the Chairman, the PNSRC membership shall consist of one individual from each of the areas designated above.* *Site Vice President/*

PNSRC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 of ANSI N18.1-1971 except for the requirement to hold a current Senior Operator License. The operations individual must hold or have held a Senior Operator License at Cook Nuclear Plant or a similar reactor. The maintenance individual shall meet the qualifications of Section 4.2.3 of ANSI N18.1-1971.

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- h. Performance of special reviews, investigations of analyses and reports thereon as requested by the Chairman of the NSDRG.

~~i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the NSDRG.~~

~~j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the NSDRG.~~

- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluations, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Nuclear Operations and to the NSDRG.

- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment system.

AUTHORITY

- 6.5.1.7 The PNSRC shall:

*Site Vice President / or designee,*

- a. Recommend to the <sup>Site Vice President /</sup>Plant Manager, written approval or disapproval of items considered under 6.5.1.6 (a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (c) and (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the <sup>Senior Vice President - Nuclear Operations</sup>Vice President - Nuclear Operations and the NSDRG of disagreement between the PNSRC and the <sup>Site Vice President /</sup>Plant Manager; however, the <sup>or designee,</sup>Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

- 6.5.1.8 The PNSRC shall maintain written minutes of each meeting and copies shall be provided to the Chairman of the NSDRG.

6.5.2 NUCLEAR SAFETY AND DESIGN REVIEW COMMITTEE (NSDRG)FUNCTION

- 6.5.2.1 The NSDRG shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering

## ADMINISTRATIVE CONTROLS

- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

## COMPOSITION

6.5.2.2 The NSDRC shall be composed of the following regular members:

1. <sup>Generation</sup> Senior Vice President - Nuclear Operations (NSDRC Chairman)
2. ~~Group Manager, Nuclear Safety, Licensing & Assessment~~ <sup>Fuel Division</sup> Nuclear Operations (NSDRC Secretary)
3. <sup>Site Vice President</sup> ~~Plant Manager~~ - Donald C. Cook Nuclear Plant
4. ~~Executive Assistant to the President~~ <sup>Vice</sup> President - Indiana Michigan Power Company
5. <sup>Executive</sup> ~~Senior Vice President and Chief Engineer~~ Engineering and Construction
6. ~~Vice President and Chief Electrical Engineer~~ Transmission and Distribution Service
7. <sup>Senior</sup> ~~A Vice President - Project Management and Construction~~ Fossil and Hydro Generation
8. Chief Nuclear Engineer ~~Manager - Nuclear Engineering Department~~
9. ~~Assistant Vice President - Civil Engineering~~
10. <sup>Manager - Nuclear Plant Engineering Support Division</sup> ~~Assistant Vice President - Design~~
11. ~~Division Manager - Environmental and Technical Assessment~~
12. ~~Director - Quality Assurance Department~~
13. ~~Manager, Plans and Programs - Nuclear Operations~~ Production Support and Administrative Services Section

Additional members and Vice Chairman may be appointed by the President and Chief Operating Officer.

## ALTERNATE MEMBERS

6.5.2.3 Designated alternate members shall be appointed by the President and Chief Operating Officer or such other person as he shall designate. In addition, temporary alternate members may be appointed by the NSDRC Chairman to serve on an interim basis, as required. Temporary alternate members are empowered to act on the behalf of the regular or designated alternate members for whom they substitute.

#### ADMINISTRATIVE CONTROLS

- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications 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 PNSRC.

#### AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NSDRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.

~~e. The Facility Emergency Plan and implementing procedures at least once per 12 months.~~

~~f. The Facility Security Plan and implementing procedures at least once per 12 months.~~

- g. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
- h. The fire protection equipment and program implementation at least once per 12 months using either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- i. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.

## ADMINISTRATIVE CONTROLS

*Site Vice President*  
shall be approved by the appropriate department head as previously designated in writing by the Plant Manager. The Plant Manager, or designee, shall approve Security Plan implementing procedures, Emergency Plan implementing procedures and Plant Manager Procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Plant Manager, or designee. Each such modification shall be reviewed: (reference T/S 6.5.3.1.e) by a qualified (reference T/S 6.5.3.1.d) individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the *Site Vice President* / Plant Manager, or ~~the~~ designee.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by qualified individuals/groups other than the individual/group which prepared the proposed test or experiment to assure cross-disciplinary review as appropriate for the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the *Site Vice President* / Plant Manager, or ~~the~~ designee.
- d. Individuals who conducted the reviews performed in accordance with Specification 6.5.3.1a, 6.5.3.1b, and 6.5.3.1c, shall be members of the plant management staff previously designated by the *Site Vice President* / Plant Manager and shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to the *Site Vice President* / Plant Manager, approval for implementation, or designee.
- ~~f. The Emergency Plan and implementing procedures shall be reviewed at least once per 12 months. Recommended changes to the~~

## ADMINISTRATIVE CONTROLS

- ~~plan and implementing procedures shall be reviewed pursuant to the requirements of Specifications 6.5.1.6 and 6.5.2.7 and approved by the Plant Manager. NRC approval shall be obtained as appropriate.~~
- ~~g. Recommended changes to the Security Plan and implementing procedures shall be reviewed pursuant to the requirements of Specifications 6.5.1.6 and 6.5.2.7 and approved by the Plant Manager. NRC approval shall be obtained as appropriate.~~

6.5.3.2 Records of the above activities shall be provided to the <sup>Site Vice President /</sup> Plant Manager, PNSRC and/or the NSDRC as necessary for required reviews.  
<sub>or designee,</sub>

## 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 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the PNSRC, and the results of this review shall be submitted to the NSDRC and the <sup>Senior</sup> Vice President - Nuclear Operations <sup>Generation</sup>.

## 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 telephone as soon as possible and in all cases within 1 hour. The Chairman of the NSDRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSRC. 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. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the NSDRC and the <sup>Senior</sup> Vice President - Nuclear <sup>Generation</sup> Operations within 14 days of the violation.
- d. 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:

## ADMINISTRATIVE CONTROLS

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
- ~~b. Security Plan implementation.~~
- ~~c. Emergency Plan implementation.~~
- d. PROCESS CONTROL PROGRAM implementation.
- e. OFFSITE DOSE CALCULATION MANUAL implementation.
- f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. I, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 A plant program for post-accident sampling shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant samples, containment atmosphere noble gas samples, and unit vent gaseous effluent samples for iodines and particulates under accident conditions. The program will include the following:

- a. Training of personnel,
- b. Procedures for sampling and analysis,
- c. Provisions for maintenance of sampling and analysis equipment.

## 6.9 REPORTING REQUIREMENTS

### ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator unless otherwise noted.

### STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

**ATTACHMENT 3 TO AEP:NRC:0659X**

**PROPOSED REVISED  
TECHNICAL SPECIFICATION  
PAGES**

## ADMINISTRATIVE CONTROLS

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Superintendent must hold or have held a Senior Operator License as specified in Section 6.2.2.h.

### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the 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.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT NUCLEAR SAFETY REVIEW COMMITTEE (PNSRC)

##### FUNCTION

6.5.1.1 The PNSRC shall function to advise the Site Vice President/Plant Manager, or designee, on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The PNSRC shall be composed of Assistant Plant Managers, Department Superintendents, or supervisory personnel reporting directly to the Site Vice President/Plant Manager, Assistant Plant Managers or Department Superintendents. The membership shall represent the functional areas of the plant, including, but not limited to Operations, Technical Support, Licensing, Maintenance and Radiation Protection.

The PNSRC membership shall consist of at least one individual from each of the areas designated. All members, including the Chairman and his alternates, the members and their alternates, shall be designated by the Site Vice President/Plant Manager.

PNSRC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 of ANSI N18.1-1971 except for the requirement to hold a current Senior Operator License. The operations individual must have held a Senior Operator License at Cook Nuclear Plant or a similar reactor. The maintenance individual shall meet the qualifications of Section 4.2.3 of ANSI N18.1-1971.

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- h. Performance of special reviews, investigations of analyses and reports thereon as requested by the Chairman of the NSDRG.
  - i. Deleted.
  - j. Deleted.
  - k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluations, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior Vice President - Nuclear Generation and to the NSDRG.
1. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment system.

## AUTHORITY

### 6.5.1.7 The PNSRC shall:

- a. Recommend to the Site Vice President/Plant Manager, or designee, written approval or disapproval of items considered under 6.5.1.6 (a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (c) and (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President - Nuclear Generation and the NSDRG of disagreement between the PNSRC and the Site Vice President/Plant Manager; however, the Site Vice President/Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

## RECORDS

6.5.1.8 The PNSRC shall maintain written minutes of each meeting and copies shall be provided to the Chairman of the NSDRG.

## 6.5.2 NUCLEAR SAFETY AND DESIGN REVIEW COMMITTEE (NSDRG)

### FUNCTION

6.5.2.1 The NSDRG shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering

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- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

#### COMPOSITION

6.5.2.2 The NSDRG shall be composed of the following regular members:

- 1. Senior Vice President - Nuclear Generation (NSDRG Chairman)
- 2. Manager - Nuclear Safety, Licensing, & Fuel Division (NSDRG Secretary)
- 3. Site Vice President/Plant Manager - Donald C. Cook Nuclear Plant
- 4. Vice President - Indiana Michigan Power Company
- 5. Executive Vice President - Engineering & Construction
- 6. Vice President - Transmission and Distribution Services
- 7. Senior Vice President - Fossil and Hydro Generation
- 8. Manager - Nuclear Engineering Department
- 9. Vice President - Civil Engineering
- 10. Manager - Nuclear Plant Engineering Support Division
- 11. Manager - Nuclear Support Services Department
- 12. Manager - Quality Assurance Department
- 13. Manager - Production Support and Administrative Services Section

Additional members and Vice Chairman may be appointed by the Chairman, President, and Chief Executive Officer.

#### ALTERNATES

6.5.2.3 Designated alternate members shall be appointed by the Chairman, President, and Chief Executive Officer or such other person as he shall designate. In addition, temporary alternate members may be appointed by the NSDRG Chairman to serve on an interim basis, as required. Temporary alternate members are empowered to act on the behalf of the regular or designated alternate members for whom they substitute.

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- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications 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 PNSRC.

## AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NSDRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. Deleted.
- f. Deleted.
- g. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
- h. The fire protection equipment and program implementation at least once per 12 months using either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- i. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.

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shall be approved by the appropriate department head as previously designated in writing by the Site Vice President/Plant Manager, or designee. The Site Vice President/Plant Manager, or designee, shall approve Plant Manager Procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Site Vice President/Plant Manager, or designee. Each such modification shall be reviewed (reference T/S 6.5.3.1.e) by a qualified (reference T/S 6.5.3.1.d) individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Site Vice President/Plant Manager, or designee.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by qualified individuals/groups other than the individual/group which prepared the proposed test or experiment to assure cross-disciplinary review as appropriate for the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the Site Vice President/Plant Manager, or designee.
- d. Individuals who conducted the reviews performed in the accordance with Specification 6.5.3.1a, 6.5.3.1b, and 6.5.3.1c, shall be members of the plant management staff previously designated by the Site Vice President/Plant Manager and shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to the approval of the Site Vice President/Plant Manager, or designee, for implementation.
- f. Deleted.

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- g. Deleted.

6.5.3.2 Records of the above activities shall be provided to the Site Vice President/Plant Manager, or designee, PNSRC and/or the NSDRG as necessary for required reviews.

## 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 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the PNSRC, and the results of this review shall be submitted to the NSDRG and the Senior Vice President - Nuclear Generation.

## 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 telephone as soon as possible and in all cases within 1 hour. The Chairman of the NSDRG shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSRC. 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. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the NSDRG and the Senior Vice President - Nuclear Generation within 14 days of the violation.
- d. 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:

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- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.
- b. Deleted.
- c. Deleted.
- d. PROCESS CONTROL PROGRAM implementation.
- e. OFFSITE DOSE CALCULATION MANUAL implementation.
- f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 A plant program for post-accident sampling shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant samples, containment atmosphere noble gas samples, and unit vent gaseous effluent samples for iodines and particulates under accident conditions. The program will include the following:

- a. Training of personnel,
- b. Procedures for sampling and analysis,
- c. Provisions for maintenance of sampling and analysis equipment.

## 6.9 REPORTING REQUIREMENTS

### ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator unless otherwise noted.

### STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

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6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Superintendent, must hold or have held a Senior Operator License as specified in Section 6.2.2.h.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the 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.

6.5 REVIEW AND AUDIT

6.5.1 PLANT NUCLEAR SAFETY REVIEW COMMITTEE (PNSRC)

FUNCTION

6.5.1.1 The PNSRC shall function to advise the Site Vice President/Plant Manager, or designee, on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PNSRC shall be composed of Assistant Plant Managers, Department Superintendents, or supervisory personnel reporting directly to the Site Vice President/Plant Manager, Assistant Plant Managers or Department Superintendents. The membership shall represent the functional areas of the plant, including, but not limited to Operations, Technical Support, Licensing, Maintenance and Radiation Protection.

The PNSRC membership shall consist of at least one individual from each of the areas designated. All members, including the Chairman and his alternates, the members and their alternates, shall be designated by the Site Vice President/Plant Manager.

PNSRC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 of ANSI N18.1-1971 except for the requirement to hold a current Senior Operator License. The operations individual must hold or have held a Senior Operator License at Cook Nuclear Plant or a similar reactor. The maintenance individual shall meet the qualifications of Section 4.2.3 of ANSI N18.1-1971.

## ADMINISTRATIVE CONTROLS

- h. Performance of special reviews, investigations of analyses and reports thereon as requested by the Chairman of the NSDRC.
- i. Deleted.
- j. Deleted.
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluations, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior Vice President - Nuclear Generation and to the NSDRC.
- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment system.

## AUTHORITY

### 6.5.1.7 The PNSRC shall:

- a. Recommend to the Site Vice President/Plant Manager, or designee, written approval or disapproval of items considered under 6.5.1.6 (a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (c) and (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President -Nuclear Generation and the NSDRC of disagreement between the PNSRC and the Site Vice President/Plant Manager; however, the Site Vice President/Plant Manager, or designee, shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

## RECORDS

6.5.1.8 The PNSRC shall maintain written minutes of each meeting and copies shall be provided to the Chairman of the NSDRC.

### 6.5.2 NUCLEAR SAFETY AND DESIGN REVIEW COMMITTEE (NSDRC)

## FUNCTION

6.5.2.1 The NSDRC shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering



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- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

## COMPOSITION

6.5.2.2 The NSDRG shall be composed of the following regular members:

- 1. Senior Vice President - Nuclear Generation (NSDRG Chairman)
- 2. Manager - Nuclear Safety, Licensing, & Fuel Division - (NSDRG Secretary)
- 3. Site Vice President/Plant Manager - Donald C. Cook Nuclear Plant
- 4. Vice President - Indiana Michigan Power Company
- 5. Executive Vice President - Engineering & Construction
- 6. Vice President - Transmission and Distribution Services
- 7. Senior Vice President - Fossil and Hydro Generation
- 8. Manager - Nuclear Engineering Department
- 9. Vice President - Civil Engineering
- 10. Manager - Nuclear Plant Engineering Support Division
- 11. Manager - Nuclear Support Services Department
- 12. Manager - Quality Assurance Department
- 13. Manager - Production Support and Administrative Services Section

Additional members and Vice Chairman may be appointed by the Chairman, President, and Chief Executive Officer.

## ALTERNATE MEMBERS

6.5.2.3 Designated alternate members shall be appointed by the Chairman, President, and Chief Executive Officer or such other person as he shall designate. In addition, temporary alternate members may be appointed by the NSDRG Chairman to serve on an interim basis, as required. Temporary alternate members are empowered to act on the behalf of the regular or designated alternate members for whom they substitute.

## ADMINISTRATIVE CONTROLS

- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications 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 PNSRC.

## AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NSDRG. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. Deleted.
- f. Deleted.
- g. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
- h. The fire protection equipment and program implementation at least once per 12 months using either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- i. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.

## ADMINISTRATIVE CONTROLS

shall be approved by the appropriate department head as previously designated in writing by the Site Vice President/Plant Manager, or designee. The Site Vice President/Plant Manager, or designee, shall approve Plant Manager Procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Site Vice President/Plant Manager, or designee. Each such modification shall be reviewed (reference T/S 6.5.3.1.e) by a qualified (reference T/S 6.5.3.1.d) individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Site Vice President/Plant Manager, or designee.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by qualified individuals/groups other than the individual/group which prepared the proposed test or experiment to assure cross-disciplinary review as appropriate for the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the Site Vice President/Plant Manager, or designee.
- d. Individuals who conducted the reviews performed in accordance with Specification 6.5.3.1a, 6.5.3.1b, and 6.5.3.1c, shall be members of the plant management staff previously designated by the Site Vice President/Plant Manager and shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to the approval of the Site Vice President/Plant Manager, or designee, for implementation.
- f. Deleted.

## ADMINISTRATIVE CONTROLS

- g. Deleted.

6.5.3.2 Records of the above activities shall be provided to the Site Vice President/Plant Manager, or designee, PNSRC and/or the NSDRC as necessary for required reviews.

## 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 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by the PNSRC, and the results of this review shall be submitted to the NSDRC and the Senior Vice President - Nuclear Generation.

## 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 telephone as soon as possible and in all cases within 1 hour. The Chairman of the NSDRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSRC. 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. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the NSDRC and the Senior Vice President - Nuclear Generation within 14 days of the violation.
- d. 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:

## ADMINISTRATIVE CONTROLS

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978:
- b. Deleted.
- c. Deleted.
- d. PROCESS CONTROL PROGRAM implementation.
- e. OFFSITE DOSE CALCULATION MANUAL implementation.
- f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 A plant program for post-accident sampling shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant samples, containment atmosphere noble gas samples, and unit vent gaseous effluent samples for iodines and particulates under accident conditions. The program will include the following:

- a. Training of personnel,
- b. Procedures for sampling and analysis,
- c. Provisions for maintenance of sampling and analysis equipment.

## 6.9 REPORTING REQUIREMENTS

### ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator unless otherwise noted.

### STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.