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ATTACHMENT 2 TO AEP:NRG:80027
EXISTING TECHNICAL SPECIFICATIONS
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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 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 10 CFR Part 55.

6.5 ~~REVIEW AND AUDIT~~ DELETED

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.

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ALTERNATES

6.5.1.3 No more than two alternates shall participate as voting members in PNSRC activities at any one time.

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the PNSRC shall consist of the Chairman or his designated alternate and at least three members including alternates..

RESPONSIBILITIES

6.5.1.6 The PNSRC shall be responsible for:

- a. Review of all Plant Manager Instructions (PMIs) and revisions thereto.
- b. Review of safety evaluations for (1) plant site procedures and revisions thereto which affect the nuclear safety of the plant; (2) changes or modifications to nuclear safety-related structures, systems or components; and (3) tests or experiments which affect plant nuclear safety to verify that such actions did not constitute an unreviewed safety question as defined in 10 CFR 50.59.
- c. Review of (1) proposed procedures and revisions to procedures, (2) changes to equipment, systems, or facilities, and (3) proposed tests or experiments which may involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Review of proposed changes to Appendix "A" Technical Specifications or the Operating License and rendering determinations in writing with regard to whether or not the proposed change constitutes a Significant Hazards Consideration.
- 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 Chairman of the NSDRC.
- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential nuclear safety hazards.

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- 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 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 NSDRC shall be composed of the following regular members:

- 1. Senior Vice President - Nuclear Generation (NSDRC Chairman)
- 2. Manager - Nuclear Safety, Licensing, & Fuel Division (NSDRC 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 President and Chief Operating Officer.

ALTERNATES

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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CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSDRC Chairman to provide expert advice to the NSDRC.

MEETING FREQUENCY

6.5.2.5 The NSDRC shall meet at least once per six months.

QUORUM

6.5.2.6 A quorum, the minimum number of regular members and alternates required to hold a NSDRC meeting shall be eight members, of whom no more than two shall be designated or temporary alternates. The Chairman or acting Chairman shall be present for all NSDRC meetings. If the number of members present is greater than a quorum, then the majority participating and voting at the meeting shall not have line responsibility for operations of the facility. For the purpose of a quorum, only the Plant Manager is considered to have line responsibility.

REVIEW

6.5.2.7. The NSDRC is responsible for assuring that independent** reviews of the following are performed:

- 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.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Proposed changes in Technical Specifications or this operating license.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.

* Regular NSDRC members are expected to attend the meeting whenever possible, and alternates may attend as voting members only on an irregular basis. If both a regular member and his alternate attend a meeting, only the regular member may participate as a voting member, and the alternate is considered a guest.

** Independent reviews may be performed by groups which report directly to the NSDRC and which must have NSDRC membership participation.

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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 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.

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- j. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- k. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 1.21, Rev. 1, June 1974 and Regulatory Guide 4.1, Rev. 1, April 1975 at least once per 12 months.
- m. Any other area of facility operation considered appropriate by the NSDRC.

AUTHORITY

6.5.2.9 The NSDRC shall report to and advise the Vice President - Nuclear Operations, AEPSC, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of NSDRC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSDRC meeting shall be prepared, approved and issued within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and issued within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President - Nuclear Operations, AEPSC, and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 TECHNICAL REVIEW AND CONTROL

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Plant Manager Procedures

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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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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, 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.
- g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.

DELETED

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.

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PROCEDURES AND PROGRAMS (Continued)

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

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,

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6.8 PROCEDURES AND PROGRAMS (continued)

- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the dose associated with 10 CFR Part 20, Appendix B, Table II, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10CFR Part 50, and
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

b. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

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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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STARTUP REPORT (continued)

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS¹

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

- a. 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 functions², 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.
- b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).
- c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.
- d. Information regarding any instances when the I-131 specific activity limit was exceeded.

¹ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

² This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.



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ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT³

6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT³

6.9.1.7 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 90 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCF and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

³ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material for each unit.

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MONTHLY REACTOR OPERATING REPORT

- 6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission (Attn: Document Control Desk), Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.

CORE OPERATING LIMITS REPORT

- 6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:
- a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,
 - b. Rod Drop Time Limits for Specification 3/4.1.3.3,
 - c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.4,
 - d. Control Rod Insertion Limits for Specification 3/4.1.3.5,
 - e. Axial Flux Difference for Specification 3/4.2.1,
 - f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,
 - g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and
 - h. Allowable Power Level for Specification 3/4.2.6.
- 6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:
- a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),
 - b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),
 - c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/ F_Q Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),
 - d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).

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CORE OPERATING LIMITS REPORT (Continued)

6.9.1.9.3 The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.

6.9.1.9.4 The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC document control desk with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the attention of the document control desk - U.S. Nuclear Regulatory Commission (Washington, D.C. 20555), with copies to the Region III Administrator and the Resident Inspector at the Cook Nuclear Plant within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.
- b. Seismic Monitoring Instrumentation Actuated, Specification 4.3.3.3.2.
- c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.
- d. High Specific Activity in RCS Coolant, Specification 3.4.8.
- e. RCS Pressure Transient Mitigated By RHR Safety Valve or RCS Vent(s), Specification 3.4.9.3.
- f. Moderator Temperature Coefficient, Specification 3.1.1.4.
- g. Sealed Source Leakage in Excess of Limits, Specification 4.7.7.1.3.
- h. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- i. Violation of Safety Limit, Specification 6.7.1.

~~ADMINISTRATIVE CONTROLS~~

~~6.10 RECORD RETENTION~~

~~DELETED~~

~~6.10.1 The following records shall be retained for at least five 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 required by Specification 6.8.1.~~
- ~~f. Records of sealed source and fission detection leak tests and results.~~
- ~~g. Records of annual physical inventory of all sealed source material on record.~~

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6.10 RECORD RETENTION (Continued)

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

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environment.
- e. Records of transient or operational cycles for those facility components identified in the Updated Final Safety Analysis Report.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the Plant Staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or review of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PNSRC and the NSDRC.
- l. Records of radioactive shipments.
- m. Records of the service lives of hydraulic snubbers including the date at which service life commences and associated installation and maintenance records.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

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6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, 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. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. 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 level in the area has been established and personnel have been made aware of it.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist (Plant Radiation Protection Supervisor). Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

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6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained, ~~as required by Specification 6.10-2.a.~~ 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 PNSRC~~ and the approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained, ~~as required by Specification 6.10-2.a.~~ 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 PNSRC~~ and the approval of the Plant 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 Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was 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.

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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, 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 10 CFR Part 55.

6.5 ~~REVIEW AND AUDIT~~

DELETED

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.

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ALTERNATES

6.5.1.3 No more than two alternates shall participate as voting members in PNSRC activities at any one time.

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the PNSRC shall consist of the Chairman or his designated alternate and at least three members including alternates.

RESPONSIBILITIES

6.5.1.6 The PNSRC shall be responsible for:

- a. Review of all Plant Manager Instructions (PMIs) and revisions thereto.
- b. Review of safety evaluations for (1) plant site procedures and revisions thereto which affect the nuclear safety of the plant; (2) changes or modifications to nuclear safety-related structures, systems or components; and (3) tests or experiments which affect plant nuclear safety to verify that such actions did not constitute an unreviewed safety question as defined in 10 CFR 50.59.
- c. Review of (1) proposed procedures and revisions to procedures, (2) changes to equipment, systems, or facilities, and (3) proposed tests or experiments which may involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Review of proposed changes to Appendix "A" Technical Specifications or the Operating License and rendering determinations in writing with regard to whether or not the proposed change constitutes a Significant Hazards Considerations.
- 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 Chairman of the NSDRG.
- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential nuclear safety hazards.

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- 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 NSDRRC shall be composed of the following regular members:

- 1. Senior Vice President - Nuclear Generation (NSDRRC Chairman)
- 2. Manager - Nuclear Safety, Licensing, & Fuel Division - (NSDRRC 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 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 NSDRRC 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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CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSDRC Chairman to provide expert advice to the NSDRC.

MEETING FREQUENCY

6.5.2.5 The NSDRC shall meet at least once per six months.

QUORUM

6.5.2.6 A quorum, the minimum number of regular members and alternates required to hold a NSDRC meeting shall be eight members, of whom no more than two shall be designated or temporary alternates. The Chairman or acting Chairman shall be present for all NSDRC meetings. If the number of members present is greater than a quorum, then the majority participating and voting at the meeting shall not have line responsibility for operations of the facility. For the purpose of a quorum, only the Plant Manager is considered to have line responsibility.

REVIEW

6.5.2.7. The NSDRC is responsible for assuring that independent** reviews of the following are performed:

- 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.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Proposed changes in Technical Specifications or this operating license.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.

* Regular NSDRC members are expected to attend the meeting whenever possible, and alternates may attend as voting members only on an irregular basis. If both a regular member and his alternate attend a meeting, only the regular member may participate as a voting member, and the alternate is considered a guest.

** Independent reviews may be performed by groups which report directly to the NSDRC and which must have NSDRC membership participation.

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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 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.



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- j. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- k. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 1.21, Rev. 1, June 1974 and Regulatory Guide 4.1, Rev. 1, April 1975 at least once per 12 months.
- m. Any other area of facility operation considered appropriate by the NSDRC.

AUTHORITY

6.5.2.9 The NSDRC shall report to and advise the Vice President - Nuclear Operations, AEPSC, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of NSDRC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSDRC meeting shall be prepared, approved and issued within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and issued within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President - Nuclear Operations, AEPSC, and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 TECHNICAL REVIEW AND CONTROL

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Plant Manager Procedures

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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 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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TECHNICAL REVIEW AND CONTROL (continued)

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~~ ^{to} within 14 days of the violation,

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

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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, 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.
- g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.

DELETED

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.

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

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

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,

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PROCEDURES AND PROGRAMS (continued)

- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the dose associated with 10 CFR Part 20, Appendix B, Table II, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10CFR Part 50, and
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

b. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

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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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STARTUP REPORT (continued)

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS¹

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

- a. 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 functions², 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.
- b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).
- c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.
- d. Information regarding any instances when the I-131 specific activity limit was exceeded.

¹ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

² This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT³

6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT³

6.9.1.7 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 90 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

³ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material for each unit.



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6.0 ADMINISTRATIVE CONTROLS

MONTHLY REACTOR OPERATING REPORT

- 6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission (Attn: Document Control Desk), Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.

CORE OPERATING LIMITS REPORT

- 6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:
- a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,
 - b. Rod Drop Time Limits for Specification 3/4.1.3.4,
 - c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.5,
 - d. Control Rod Insertion Limits for Specification 3/4.1.3.6,
 - e. Axial Flux Difference for Specification 3/4.2.1,
 - f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,
 - g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and
 - h. Allowable Power Level for Specification 3/4.2.6.
- 6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:
- a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July, 1985 (Westinghouse Proprietary),
 - b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),
 - c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/ F_Q Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),
 - d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).

ADMINISTRATIVE CONTROLS

CORE OPERATING LIMITS REPORT (Continued)

6.9.1.9.3 The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.

6.9.1.9.4 The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC document control desk with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the attention of the document control desk - U.S. Nuclear Regulatory Commission (Washington, D.C. 20555), with copies to the Region III Administrator and the Resident Inspector at the Cook Nuclear Plant within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.
- b. Seismic Monitoring Instrumentation Actuated, Specification 4.3.3.3.2.
- c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.
- d. High Specific Activity in RCS Coolant, Specification 3.4.8.
- e. RCS Pressure Transient Mitigated By RHR Safety Valve or RCS Vent(s), Specification 3.4.9.3.
- f. Moderator Temperature Coefficient, Specification 3.1.1.4.
- g. Sealed Source Leakage in Excess of Limits, Specification 4.7.7.1.3.
- h. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- i. Violation of Safety Limit, Specification 6.7.1.



6.10 ~~RECORD RETENTION~~

DELETED

6.10.1 The following records shall be retained for at least five 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 required by Specification 6.8.1.
- f. Records of sealed source and fission detection leak tests and results.
- g. Records of annual physical inventory of all sealed source material on record.



6.0 : ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

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

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environment.
- e. Records of transient or operational cycles for those facility components identified in the Updated Final Safety Analysis Report.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the Plant Staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or review of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PNSRC and the NSDRC.
- l. Records of radioactive shipments.
- m. Records of the service lives of hydraulic snubbers including the date at which service life commences and associated installation and maintenance records.
- n. Records of reviews performed for changes to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.0 ADMINISTRATIVE CONTROLS

6.12 HIGH RADIATION AREA

- 6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, 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. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
 - b. 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 level in the area has been established and personnel have been made aware of it.
 - c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.
- 6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist (Plant Radiation Protection Supervisor). Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.



ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained, ~~as required by Specification 6.10.2.n.~~ 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 PNSRG~~
~~and the approval of the Plant Manager.~~

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained, ~~as required by Specification 6.10.2.n.~~ 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 PNSRG~~
~~and the approval of the Plant 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 Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was 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.



ATTACHMENT 3 TO AEP:NRC:80027
REVISED TECHNICAL SPECIFICATION PAGES



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6.0 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 10 CFR Part 55.

6.5 DELETED

6.0 ADMINISTRATIVE CONTROLS

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.
- b. Deleted.

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. Within 24 hours notify the Senior Vice President - Nuclear Generation.
- b. A Safety Limit Violation Report shall be prepared. 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. Within 14 days of the violation, the Safety Limit Violation Report shall be submitted to the Commission and to the Senior Vice President - Nuclear Generation.
- d. Operation of the unit shall not be resumed until authorized by the Commission.

6.0 ADMINISTRATIVE CONTROLS

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, 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.
- g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.

6.8.2 Deleted.

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.



6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

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

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the dose associated with 10 CFR Part 20, Appendix B, Table II, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10CFR Part 50, and
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

b. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.



6.0 ADMINISTRATIVE CONTROLS

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.



6.0 ADMINISTRATIVE CONTROLS

6.9 STARTUP REPORT (Continued)

- 6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS¹

- 6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.
- 6.9.1.5 Reports required on an annual basis shall include:
- 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 functions², 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.
 - The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).
 - Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.
 - Information regarding any instances when the I-131 specific activity limit was exceeded.

¹ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

² This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.0 ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT³

- 6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT³

- 6.9.1.7 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 90 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

³ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material for each unit.

6.0 ADMINISTRATIVE CONTROLS

MONTHLY REACTOR OPERATING REPORT

- 6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission (Attn: Document Control Desk), Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.

CORE OPERATING LIMITS REPORT

- 6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:
- a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,
 - b. Rod Drop Time Limits for Specification 3/4.1.3.3,
 - c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.4,
 - d. Control Rod Insertion Limits for Specification 3/4.1.3.5,
 - e. Axial Flux Difference for Specification 3/4.2.1,
 - f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,
 - g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and
 - h. Allowable Power Level for Specification 3/4.2.6.
- 6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:
- a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),
 - b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),
 - c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/FQ Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),
 - d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).

6.0 ADMINISTRATIVE CONTROLS

CORE OPERATING LIMITS REPORT (Continued)

- 6.9.1.9.3 The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.
- 6.9.1.9.4 The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC document control desk with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

- 6.9.2 Special reports shall be submitted to the attention of the document control desk - U.S. Nuclear Regulatory Commission (Washington, D.C. 20555), with copies to the Region III Administrator and the Resident Inspector at the Cook Nuclear Plant within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:
- a. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.
 - b. Seismic Monitoring Instrumentation Actuated, Specification 4.3.3.3.2.
 - c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.
 - d. High Specific Activity in RCS Coolant, Specification 3.4.8.
 - e. RCS Pressure Transient Mitigated By RHR Safety Valve or RCS Vent(s), Specification 3.4.9.3.
 - f. Moderator Temperature Coefficient, Specification 3.1.1.4.
 - g. Sealed Source Leakage in Excess of Limits, Specification 4.7.7.1.3.
 - h. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
 - i. Violation of Safety Limit, Specification 6.7.1.

6.10 DELETED



6.0 ADMINISTRATIVE CONTROLS

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, 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*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. 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 level in the area has been established and personnel have been made aware of it.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist (Plant Radiation Protection Supervisor). Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

* Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.



6.0 ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained. 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 the approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. 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 the approval of the Plant 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 Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was 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.



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6.0 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 10 CFR Part 55.

6.5 DELETED

6.0 ADMINISTRATIVE CONTROLS

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.
- b. Deleted.

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. Within 24 hours notify the Senior Vice President - Nuclear Generation.
- b. A Safety Limit Violation Report shall be prepared. 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. Within 14 days of the violation, the Safety Limit Violation Report shall be submitted to the Commission and to the Senior Vice President - Nuclear Generation.
- d. Operation of the unit shall not be resumed until authorized by the Commission.



6.0 ADMINISTRATIVE CONTROLS

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, 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.
- g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.

6.8.2 Deleted.

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.

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

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

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,



6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the dose associated with 10 CFR Part 20, Appendix B, Table II, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50, and
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

b. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.0 ADMINISTRATIVE CONTROLS

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.



6.0 ADMINISTRATIVE CONTROLS

STARTUP REPORT (Continued)

- 6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS¹

- 6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.
- 6.9.1.5 Reports required on an annual basis shall include:
- a. 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 functions², 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.
 - b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).
 - c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.
 - d. Information regarding any instances when the I-131 specific activity limit was exceeded.

¹ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

² This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.0 ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT³

- 6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT³

- 6.9.1.7 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 90 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

³ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material for each unit.

6.0 ADMINISTRATIVE CONTROLS

MONTHLY REACTOR OPERATING REPORT

- 6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission (Attn: Document Control Desk), Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.

CORE OPERATING LIMITS REPORT

- 6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:
- a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,
 - b. Rod Drop Time Limits for Specification 3/4.1.3.4,
 - c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.5,
 - d. Control Rod Insertion Limits for Specification 3/4.1.3.6,
 - e. Axial Flux Difference for Specification 3/4.2.1,
 - f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,
 - g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and
 - h. Allowable Power Level for Specification 3/4.2.6.
- 6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:
- a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),
 - b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),
 - c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/ F_Q Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),
 - d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).



6.0 ADMINISTRATIVE CONTROLS

CORE OPERATING LIMITS REPORT (Continued)

- 6.9.1.9.3 The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.
- 6.9.1.9.4 The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC document control desk with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

- 6.9.2 Special reports shall be submitted to the attention of the document control desk - U.S. Nuclear Regulatory Commission (Washington, D.C. 20555), with copies to the Region III Administrator and the Resident Inspector at the Cook Nuclear Plant within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:
- a. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.
 - b. Seismic Monitoring Instrumentation Actuated, Specification 4.3.3.3.2.
 - c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.
 - d. High Specific Activity in RCS Coolant, Specification 3.4.8.
 - e. RCS Pressure Transient Mitigated By RHR Safety Valve or RCS Vent(s), Specification 3.4.9.3.
 - f. Moderator Temperature Coefficient, Specification 3.1.1.4.
 - g. Sealed Source Leakage in Excess of Limits, Specification 4.7.7.1.3.
 - h. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
 - i. Violation of Safety Limit, Specification 6.7.1.

6.10 DELETED



6.0 ADMINISTRATIVE CONTROLS

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, 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*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. 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 level in the area has been established and personnel have been made aware of it.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist (Plant Radiation Protection Supervisor). Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

* Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.



6.0 ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained. 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 the approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. 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 the approval of the Plant 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 Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was 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.