

## Appendix C

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ADMINISTRATIVE CONTROLS6.5 REVIEW AND AUDIT

## 6.5.1 Plant Nuclear Safety Review Committee (PNSRC)

FUNCTION

6.5.1.1 The PNSRC shall function to advise the Site Vice President [REDACTED], or designee, on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PNSRC shall be composed of a Plant Manager or his designee, Area Manager(s), and Department Superintendent(s) or [REDACTED] personnel reporting directly to an Area Manager or a Department Superintendent. The membership shall represent the functional areas of the plant, including, but not limited to Operations, Engineering, 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 [REDACTED].

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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.

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 alternates.

QUORUM

- 6.5.1.5 The 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(s).
  - 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.



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- g. Review of facility operations to detect potential nuclear safety hazards.
- 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 Executive 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 [REDACTED], 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 Executive Vice President - Nuclear Generation and the NSDRC of disagreement between the PNSRC and the Site Vice President [REDACTED]; however, the Site Vice President 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
  - c. chemistry and radiochemistry
  - d. metallurgy
  - e. instrumentation and control

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- 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. Executive Vice President- Nuclear generation (NSDRC Chairman)
- 2. Director - Regulatory Affairs (NSDRC Secretary)
- 3. Site Vice President [REDACTED] - Donald C. Cook Nuclear Plant
- 4. Plant Manager - Donald C. Cook Nuclear Plant
- 5. Chief Nuclear Engineer
- 6. Director - Business Performance
- 7. Director - Performance Assurance
- 8. Director - Plant Engineering
- 9. Manager - Performance Engineering and Analysis
- 10. Special Assistant - Nuclear Engineering
- 11. [REDACTED]
- 12. [REDACTED]
- 13. [REDACTED]

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

ALTERNATE MEMBERS

6.5.2.3 Designated alternate members shall be appointed by the Executive Vice President 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.

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.

ADMINISTRATIVE CONTROLSQUORUM

- 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<sup>\*</sup> 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<sup>\*\*</sup> 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.
  - 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.

<sup>\*</sup>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.

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

ADMINISTRATIVE CONTROLSAUDITS

- 6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NSDRC. These audits shall encompass:
- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
  - b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
  - c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
  - d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
  - e. Deleted.
  - f. Deleted.
  - g. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
  - h. The fire protection equipment and program implementation at least once per 12 months using either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
  - i. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.
  - 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 ~~Executive~~ Vice President Nuclear Generation on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

ADMINISTRATIVE CONTROLSRECORDS

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 Executive Vice President Nuclear Generation 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 shall be approved by the appropriate department head as previously designated in writing by the Site Vice President, or designee. The Site Vice President, 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, 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, or designee.





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- 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 [REDACTED], 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 [REDACTED] 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 [REDACTED], or designee, for implementation.
  - f. Deleted.
  - g. Deleted.
- 6.5.3.2 Records of the above activities shall be provided to the Site Vice President [REDACTED] or designee, PNSRC and/or the NSDRC as necessary for required reviews.

6. 6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. [REDACTED]
- b. Each REPORTABLE EVENT shall be reviewed by the PNSRC, and the results of this review shall be submitted to the NSDRC and the Executive 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. Within 24 hours notify the Executive Vice President - Nuclear Generation.

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- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by 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. Within 14 days of the violation, the Safety Limit Violation Report shall be submitted to the Commission, and to the Executive Vice President - Nuclear Generation.
- d. (retained in technical specifications)

6.8 PROCEDURES AND PROGRAMS

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

6.10 RECORD RETENTION

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 the Technical Specifications.
- e. Records of changes made to the procedures required by Technical 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.

6.10.2 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.



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- 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.

6.13 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. (retained in technical specifications)
  - 2. (retained in technical specifications)
- b. Shall become effective after review and acceptance by the PNSRC and approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

## 6.14.1 Changes to the ODCM:

- a. Shall be documented and record of reviews performed shall be retained as required by Specification 6.10.2.n. This documentation shall contain:
  - 1. (retained in technical specifications)
  - 2. (retained in technical specifications)
- b. Shall become effective after review and acceptance by the PNSRC and the approval of the Plant Manager.
- c. (retained in technical specifications)