

ATTACHMENT TWO

MARK-UP OF TECHNICAL SPECIFICATIONS

(PAGES 6-1, 6-7 THRU 6-13)

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ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.1.2 The Plant Supervisor - Nuclear (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Site Vice President shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 An onsite and an offsite organization shall be established for facility operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

(TQAR)

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to an including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3).
- b. The Senior ~~Vice President-Nuclear~~ ^{CORPORATE NUCLEAR OFFICER (as defined in the TQAR)} shall have corporate responsibility for overall plant nuclear safety, and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- c. The Plant Manager-Nuclear shall be responsible for overall plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.
- e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the health physics manager shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- 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 Senior ~~Vice President-Nuclear~~ *Corporate Nuclear Officer* and to the Chairman of the Company Nuclear Review Board;
- f. Review of all REPORTABLE EVENTS;
- g. Review of reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment or systems that affect nuclear safety.
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager - Nuclear or the Chairman of the Company Nuclear Review Board;
- i. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Chairman of the Company Nuclear Review Board;
- j. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL;
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior ~~Vice President-Nuclear~~ *Corporate Nuclear Officer* and to the Chairman of the Company Nuclear Review Board.

6.5.1.7 The PNSC shall:

- a. Recommend in writing to the Plant Manager - Nuclear approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation and items considered under Specification 6.5.1.6i through k. *Corporate Nuclear Officer*
- b. Provide written notification within 24 hours to the Plant Manager-Nuclear Senior ~~Vice President-Nuclear~~ and the Company Nuclear Review Board of disagreement between the PNSC and the Plant Manager Nuclear; however, the Plant Manager - Nuclear shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

ADMINISTRATIVE CONTROLS

RECORDS

6.5.1.8 The PNSC shall maintain written minutes of each PNSC meeting that, at a minimum, document the results of all PNSC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Senior ~~Vice President Nuclear~~ and the Company Nuclear Review Board.
Corporate Nuclear Officer

6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)

FUNCTION

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

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

Senior Corporate Nuclear Officer
The CNRB shall report to and advise the ~~Executive Vice President~~ on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

COMPOSITION

Senior Corporate Nuclear Officer
6.5.2.2 The ~~Executive Vice President~~ shall appoint, in writing, a minimum of five members to the CNRB and shall designate from this membership, in writing, a Chairman. The membership shall function to provide independent review and audit in the areas listed in Specification 6.5.2.1. The Chairman shall meet the requirements of ANSI/ANS - 3.1 - 1987, Section 4.7.1. The members of the CNRB shall meet the educational requirements of ANSI/ANS - 3.1 - 1987, Section 4.7.2, and have at least 5 years of professional level experience in one or more of the fields listed in Specification 6.5.2.1. CNRB members who do not possess the educational requirements of ANSI/ANS - 3.1 - 1987, Section 4.7.2 (up to a maximum of two members) shall be evaluated, and have their membership approved and documented, in writing, on a case-by-case basis by the ~~Executive Vice President~~ *Senior Corporate Nuclear Officer*, considering the alternatives to the educational requirements of ANSI/ANS - 3.1 - 1987, Sections 4.1.1 and 4.1.2.

ALTERNATES

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

ADMINISTRATIVE CONTROLS

CONSULTANTS

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

MEETING FREQUENCY

6.5.2.5 The CNRB shall meet at least once per 6 months and as convened by the CNRB chairman or his designated alternate.

QUORUM

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

REVIEW

6.5.2.7 The CNRB shall be responsible for the review of:

- 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 to 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 unit 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 structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PNSC.

ADMINISTRATIVE CONTROLS

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the CNRB. 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 Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing 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;
- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months;
- k. The Emergency Plans and implementing procedures at least once per 12 months;
- l. The Security Plans and implementing procedures at least once per 12 months; and
- m. Any other area of unit operation considered appropriate by the CNRB or the ~~Executive Vice President~~,
Senior Corporate Nuclear Officer.

ADMINISTRATIVE CONTROLS

RECORDS

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

- a. Minutes of each CNRB meeting shall be prepared, approved, and forwarded to the ~~Executive Vice President~~ within 14 days following each meeting; *Senior Corporate Nuclear Officer*
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the ~~Executive Vice President~~ within 14 days following completion of the review; and *Senior Corporate Nuclear Officer*
- c. Audit reports *(Senior Corporate Nuclear Officer)* encompassed by Specification 6.5.2.8 shall be forwarded to the ~~Executive Vice President~~ and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

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

- a. Procedures required by Specification 6.8, and other procedures that affect nuclear safety, and changes thereto, shall be prepared, reviewed, and approved. Each such procedure, or change thereto, shall be reviewed by an individual/group other than the individual/group who prepared the procedure, or change thereto, but who may be from the same organization as the individual/group who prepared the procedure, or change thereto. Procedures other than plant administrative procedures shall be approved by the Plant Manager-Nuclear, Operations Superintendent, or the head of the department assigned responsibility for those procedures prior to implementation. The Plant Manager-Nuclear shall approve plant administrative procedures and emergency plan implementing procedures. Security Plan and the implementing procedures shall be approved by Site Services Manager-Nuclear prior to implementation. Changes to procedures that may involve a change to the intent of the original procedures shall be approved by the individual authorized to approve the procedure prior to implementation of the change.

ADMINISTRATIVE CONTROLS

ACTIVITIES (Continued)

- b. Individuals responsible for reviews performed in accordance with Specification 6.5.3.1 (a) shall be members of the plant staff previously designated by the Plant Manager-Nuclear and meet or exceed the minimum qualifications of ANSI N18.1-1971, Sections 4.2, 4.3.1, 4.4 and 4.6.1.
- c. Each 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.
- d. Each review will include a determination of whether or not an unreviewed safety question is involved.

6.5.3.2 Records of the above activities shall be provided to the Plant Manager, PNSC, and/or the CNRB 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 Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PNSC, and the results of this review shall be submitted to the CNRB and the Senior Vice ~~President-Nuclear~~. *Corporate Nuclear Officer*

6.7 SAFETY LIMIT VIOLATION

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

- a. In accordance with 10 CFR 50.72, the NRC Operations Center, shall be notified by telephone as soon as practical and in all cases within one hour after the violation has been determined. The Senior ~~Vice President-Nuclear~~, and the CNRB shall be notified within 24 hours. *Corporate Nuclear Officer*

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- b. A Licensee Event Report shall be prepared in accordance with 10 CFR 50.73.
- c. The License Event Report shall be submitted to the Commission in accordance with 10 CFR 50.73, and to the CNRB, and the Senior Vice President-Nuclear within 30 days after discovery of the event.
- d. Critical operation of the unit shall not be resumed until authorized by the Nuclear Regulatory Commission.

6.8 PROCEDURES AND PROGRAMS

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

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Sections 5.1 and 5.3 of ANSI N18.7-1972;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- c. Security Plan implementation;
- d. Emergency Plan implementation;
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Control Program for effluent monitoring using the guidance in Regulatory Guide 1.21, Revision 1, June 1974;
- h. Facility Fire Protection Program; and
- i. Quality Control Program for environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of Specification 6.8.1 (a through h), and changes thereto, shall be reviewed and approved prior to implementation and reviewed periodically as set forth in Specification 6.5.3 and administrative procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 (a through i) may be made provided:

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