

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATIONS

Marked-up Technical Specifications Pages,

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ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

General

6.1.1 The Plant Manager ~~X 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 ~~X 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..

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to, and 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 President-Nuclear Division 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 ~~X 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.

General

Supervisor

ADMINISTRATIVE CONTROLS

PLANT STAFF (Continued)

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the applicable department manager ~~superintendent~~, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager General ~~Nuclear~~ or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- h. The Operations Supervisor shall hold a Senior Reactor Operator License. Manager
- i. The Operations ~~Superintendent~~ shall either hold or have held a Senior Reactor Operator License on the Turkey Point Plant, or have held a Senior Reactor Operator License on a similar plant (i.e. another pressurized water reactor).

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TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION		
	BOTH UNITS IN MODE 1, 2, 3, or 4	BOTH UNITS IN MODE 5 or 6 OR DEFUELED	ONE UNIT IN MODE 1, 2, 3, or 4 AND ONE UNIT IN MODE 5 or 6 or DEFUELED
NPS PSN	1	1	1
SRO	1	none**	1
RO	3*	2*	3*
AO	3*	3*	3*
STA	1***	none	1***

~~NPS~~ ~~PSN~~ - Plant Supervisor ~~Nuclear~~ with a Senior Operator license
 SRO - Individual with a Senior Operator license
 RO - Individual with an Operator license
 AO - Auxiliary Operator
 STA - Shift Technical Advisor

The shift crew composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Plant Supervisor ~~Nuclear~~ from the control room while a unit is in MODE 1, 2, 3, or 4, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Plant Supervisor ~~Nuclear~~ from the control room while both units are in MODE 5 or 6, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

*At least one of the required individuals must be assigned to the designated position for each unit.

**At least one licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling must be present during CORE ALTERATIONS on either unit, who has no other concurrent responsibilities.

***The STA position shall be manned in MODES 1, 2, 3, and 4 unless the Plant Supervisor ~~Nuclear~~ or the individual with a Senior Operator license meets the qualifications for the STA as required by the NRC.

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ADMINISTRATIVE CONTROLS

6.2.3 SHIFT TECHNICAL ADVISOR

6.2.3.1 The Shift Technical Advisor shall provide advisory technical support to the Plant Supervisor ~~Nuclear~~ in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit and the opposite unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

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 the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Operations ~~Superintendent~~ whose requirement for a Senior Reactor Operator License is as stated in Specification 6.2.2.i. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in 10 CFR Part 55 and ANSI 3.1, 1981.

Manager

6.3.2 When the Health Physics Supervisor does not meet the above requirements, compensatory action shall be taken which the Plant Nuclear Safety Committee determines and the NRC office of Nuclear Reactor Regulation concurs that the action meets the intent of Specification 6.3.1.

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 ~~Superintendent~~ and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971, 10 CFR Part 55 and ANSI 3.1, 1981 and shall include familiarization with relevant industry operational experience.

Manager

6.4.2 A training program for the fire brigade shall be maintained under the direction of the Fire Protection Supervisor and shall meet or exceed the requirements of 10 CFR 50.48 and 10 CFR 50 Appendix R.

6.5 REVIEW AND AUDIT

6.5.1 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)

FUNCTION

6.5.1.1 The PNSC shall function to advise the Plant ~~Manager~~ ~~Nuclear~~ on all matters related to nuclear safety.

General

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ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.1.2 ~~The PNSC shall be composed of the:~~

~~Member: Plant Manager - Nuclear~~
~~Member: Operations Superintendent - Nuclear~~
~~Member: Technical Department Supervisor~~
~~Member: Maintenance Superintendent - Nuclear~~
~~Member: Instrument and Control Supervisor~~
~~Member: Reactor Supervisor~~
~~Member: Health Physics Supervisor~~
~~Member: Quality Control Superintendent~~
~~Member: Operations Supervisor - Nuclear~~
~~Member: Licensing Superintendent~~

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~~The PNSC Chairman shall be appointed in writing from among these members by the Plant Manager - Nuclear.~~

ALTERNATES

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

General

MEETING FREQUENCY

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

QUORUM

6.5.1.5 The quorum of the PNSC necessary for the performance of the PNSC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or Vice Chairman and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The PNSC shall be responsible for:

- a. Review of all safety-related plant administrative procedures and changes thereto.
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix "A" Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;

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COMPOSITION

6.5.1.2 The PSNC shall have a minimum of nine voting members comprised of individuals from the following disciplines:

Operations	Technical Support
Maintenance	Licensing
Health Physics	Quality Assurance/Control
Reactor Engineering	Instrument and Control
Services	

The PNSC Chairman shall be appointed in writing from among the members by the Plant General Manager.

The members, according to individual job titles, shall meet the requirements as described in Sections 4.2, 4.3, or 4.4, of the ANSI N-18.1-1971.

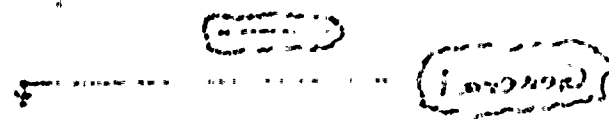
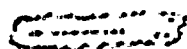
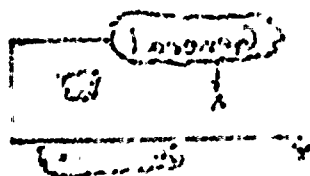
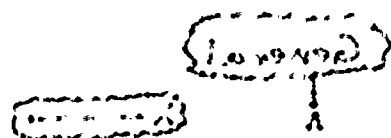
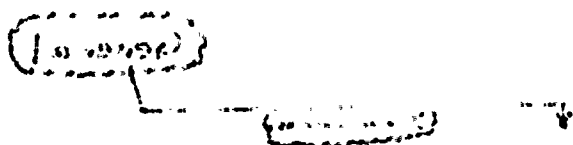
ADMINISTRATIVE CONTROLS

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 President-Nuclear Division 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 ~~X Nuclear~~ or the Chairman of the Company Nuclear Review Board; General
- 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 President-Nuclear Division 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 ~~X 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. General
- b. Provide written notification within 24 hours to the Plant Manager ~~X Nuclear~~, President-Nuclear Division and the Company Nuclear Review Board of disagreement between the PNSC and the Plant Manager ~~X Nuclear~~; however, the Plant Manager ~~X Nuclear~~ shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1. General



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 President-Nuclear Division within 14 days following each meeting;
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the President-Nuclear Division within 14 days following completion of the review; and
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the President-Nuclear Division 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.

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ADMINISTRATIVE CONTROLS

ACTIVITIES (Continued)

General

- 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.

General

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 President-Nuclear Division.

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 President-Nuclear Division, and the CNRB shall be notified within 24 hours.

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ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed in accordance with Specification 6.5.3 and approved by the Plant Manager ^{General} ~~Nuclear~~ or the department head of the responsible department within 14 days of implementation.

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

- a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the Safety Injection System, Chemical and Volume Control System, and the Containment Spray System. The program shall include the following:

- (1) Preventive maintenance and periodic visual inspection requirements, and
- (2) Integrated leak test requirements for each system at refueling cycle intervals or less.

- b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (1) Training of personnel,
- (2) Procedures for monitoring, and
- (3) Provisions for maintenance of sampling and analysis equipment.

- c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- (1) Identification of a sampling schedule for the critical variables and control points for these variables,
- (2) Identification of the procedures used to measure the values of the critical variables,

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ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.3 Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of the following year.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, with operational controls, as appropriate, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of the Land Use Census required by Specification 3.12.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the Offsite Dose Calculation Manual, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

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The reports shall also include the following: a summary description of the Radiological Environmental Monitoring Program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program and the corrective action taken if the specified program is not being performed as required by Specification 3.12.3; reasons for not conducting the Radiological Environmental Monitoring Program as required by specification 3.12.1, and discussion of all deviations from the sampling schedule of Table 3.12-1; discussion of environmental sample measurements that exceed the reporting levels of Table 3.12-2 but are not the result of plant effluents, pursuant to ACTION b. of Specification 3.12.1; and discussion of all analyses in which the LLD required by Table 4.12-1 was not achievable.

*A single submittal may be made for a multiple unit station.

**One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

- 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 facility radiation and contamination surveys;
- d. Records of radiation exposure for all individuals entering radiation control areas;
- e. Records of gaseous and liquid radioactive material released to the environs;
- f. Records of transient or operational cycles for those unit components identified in Table 5.7-1;
- g. Records of reactor tests and experiments;
- h. Records of training and qualification for current members of the facility staff;
- i. Records of inservice inspections performed pursuant to these Technical Specifications;
- j. Records of quality assurance activities required for the duration of the unit Operating License by the Quality Assurance Manual;
- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- l. Records of meetings of the PNSC and the CNRB;
- m. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.6 including the date at which the service life commences and associated installation and maintenance records;
- n. Records of secondary water sampling and water quality; and
- o. Annual Radiological Environmental ~~Monitoring~~ Reports and records of analyses transmitted to the licensee which are used to prepare the Annual Radiological Environmental ~~Monitoring~~ Report.
- p. Records for Environmental Qualification which are covered under the provisions of 10 CFR 50.49.

Operating

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved,

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