

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

SURRY POWER STATION

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, SAFETY AND OPERATION REVIEW

Specification

- A. The Station Manager shall be responsible for the safe operation of the facility. In his absence, the Assistant Station Manager shall be responsible for the safe operation of the facility. During the absence of both, the Station Manager shall delegate in writing the succession to this responsibility.
1. The offsite organization for facility management and technical support shall be as shown on TS Figure 6.1-1.
- B. The Station organization shall conform to the chart as shown on TS Figure 6.1-2.
1. Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N.18.1-1971 for comparable positions, except for the Supervisor-Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
 2. Retraining and replacement training of station personnel shall be in accordance with American National Standard 18.1 "Selection and Training of Nuclear Power Plant Personnel" dated March 8, 1971 and 10 CFR 55, Appendix A.
 3. The following requirements supplement the applicable regulations of 10 CFR 50.54:

<u>CONDITION</u>	<u>MINIMUM COMPLEMENT^a</u>
1. One unit operating	1 SLO, 2 LO, 2 AO
2. One unit fueled and shutdown**	1 SLO, 1 LO, 1 AO
3. One unit operating and One unit shutdown	1 SLO*, 3 LO, 2 AO
4. Both units fueled and shutdown**	1 SLO, 2 LO, 1 AO
5. Both units operating	2 SLO, 3 LO, 2 AO

Note:

SLO = Senior Licensed Operator as defined by 10 CFR 55.4(e)

LO = Licensed Operator as defined by 10 CFR 55.4(d)

AO = Auxiliary Operator

* = When the shutdown unit is undergoing refueling or startup, 1 additional SLO will be added to this shift complement to ensure supervision of these activities.

** = A LO for each fueled unit shall be in the control room and a SLO shall be on site. For each SLO in the control room, the requirement to have a LO in the control room shall be waived.

a = An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.

4. A fire team of at least five members, all of whom have received fire service training, will be maintained on-site at all times. This excludes personnel in Section 3 above of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.
5. A training program for the fire brigade and fire teams shall be maintained under the directions of a Fire Marshall and shall meet or exceed the requirements of the NFPA Code Section 27 (1975), except that training sessions and drills shall be held at least once per 92 days.

C. Organization units to provide a continuing review of the operational and safety aspects of the nuclear facility shall be constituted and have the authority and responsibilities outlined below:

1. Station Nuclear Safety and Operation Committee

a. Function

The SNSOC shall function to advise the Station Manager on all matters related to nuclear safety.

b. Composition

The SNSOC shall be composed of the:

Chairman:	Station Manager
Vice Chairman:	Assistant Station Manager
Member:	Superintendent-Operations
Member:	Superintendent-Maintenance
Member:	Superintendent-Technical Services

c. Alternates

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

d. Meeting Frequency

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

e. Quorum

A quorum of the SNSOC shall consist of the Chairman or Vice Chairman and two members including alternates.

f. Responsibilities

The SNSOC shall be responsible for:

1. Review of 1) all proposed normal, abnormal, and emergency operating procedures and all proposed maintenance procedures and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Station Manager which affect nuclear safety.
2. Review of all proposed test and experiment procedures and results thereof when applicable.
3. Review of proposed changes to Technical Specifications.
4. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
5. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager, Nuclear Operations and Maintenance and to the Director, Safety Evaluation and Control.
6. Review of events requiring 24 hour written notification to the Commission.
7. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Station Nuclear Safety and Operating Committee.
8. Initiate periodic drills to test the effectiveness of the emergency procedures.

g. Authority

The SNSOC shall:

1. Recommend to the Station Manager written approval or disapproval of items considered under f(1) through f(4) above.

2. Render determinations in writing with regard to whether or not each item considered under f(1) through f(5) above constitutes an unreviewed safety question.
3. Provide written notification within 24 hours to the Manager, Nuclear Operations and Maintenance and the Director, Safety Evaluation and Control of disagreement between the SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1-A above.

h. Records

The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Manager, Nuclear Operations and Maintenance and to the Director, Safety Evaluation and Control.

2. Safety Evaluation and Control (SEC)

a. Function

The SEC group shall function to provide independent review of designated activities in the areas of:

1. Nuclear power plant operations
2. Nuclear engineering
3. Chemistry and radiochemistry
4. Metallurgy
5. Instrumentation and control
6. Radiological safety

7. Mechanical and electrical engineering
8. Administrative controls and quality assurance practices
9. Other appropriate fields associated with the unique characteristics of the nuclear power plant

b. Composition

The SEC staff shall be composed of the Director, Safety Evaluation and Control and a minimum of three staff specialists. Each member of the SEC staff shall meet or exceed the minimum qualifications of ANSI N 18.1-1971.

c. Consultants

Consultants shall be utilized as determined by the Director, Safety Evaluation and Control to provide expert advice to the SEC staff.

d. Review

The following subjects shall be reviewed by the SEC staff:

1. Written safety evaluations of changes in the stations as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report and tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2) and is accomplished by review of minutes of the Station Nuclear

Safety and Operating Committee and the design change program.

2. Proposed changes in procedures, proposed changes in the station, or proposed tests or experiments, any of which may involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59 (a)(2). Matters of this kind shall be referred to the SEC staff by the Station Nuclear Safety and Operating Committee following its review prior to implementation.
3. Changes in the Technical Specifications or license amendments relating to nuclear safety prior to implementation except in those cases where the change is identical to a previously reviewed proposed change.
4. Violations and reportable occurrences such as:
 - (a) Violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance;
 - (b) Significant operating abnormalities or deviations from normal or expected performance of station safety-related structures, systems, or components; and
 - (c) Reportable occurrences as defined in the station Technical Specification 6.6.2.a.

Review of events covered under this paragraph shall include the results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

5. Any other matter involving safe operation of the nuclear power stations which is referred to the SEC staff by the Station Nuclear Safety and Operating Committee.

6. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

e. Authority

The SEC staff shall report to and advise the Manager, Nuclear Technical Services, who shall advise the Executive Vice President-Power on those areas of responsibility specified in Section 6.1.C.2.d.

f. Records

Records of SEC activities shall be prepared and maintained in the SEC files and a summary shall be disseminated as indicated below each calendar month.

1. Executive Vice President-Power
2. Nuclear Power Station Managers
3. Manager-Nuclear Operations and Maintenance
4. Manager-Nuclear Technical Services
5. Executive Manager-Licensing and Quality Assurance
6. Others that the Director, Safety Evaluation and Control may designate.

3. Quality Assurance Department

a. Function

The Quality Assurance Department shall function to audit

station activities. 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 calendar year.
- b. The performance, training and qualifications of the entire facility staff at least once per calendar year.
- 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 twice per calendar year.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two calendar years.
- e. The Station Emergency Plan and implementing procedures at least once per two calendar years.
- f. The Station Security Plan and implementing procedures at least once per two calendar years.
- g. Any other area of facility operation considered appropriate by the Executive Manager-Licensing and Quality Assurance or the Executive Vice President-Power.
- h. The Station Fire Protection Program and implementing procedures at least once per two calendar years.

6.2 ACTION TO BE TAKEN IN THE EVENT OF A REPORTABLE OCCURENCE IN
STATION OPERATION

Specification

- A. The following actions shall be taken for reportable occurrences:
1. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.6.
 2. Each reportable occurrence requiring 24 hour notification to the Commission shall be reviewed by the SNSOC and submitted to the SEC staff and the Manager, Nuclear Operations and Maintenance.

6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED

Specification

- A. The following actions shall be taken in the event a Safety Limit is violated:
1. The facility shall be placed in at least hot shutdown.
 2. The Safety Limit violation shall be reported to the Commission, the Manager-Nuclear Operations and Maintenance, and to the SEC staff within 24 hours.
 3. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSOC. 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.
 4. The Safety Limit Violation Report shall be submitted to the Commission, the SEC staff, and the Manager-Nuclear Operations and Maintenance within 14 days of the violation.