

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

SURRY POWER STATION

18102270507

## 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, and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for the Supervisor-Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

2. The Shift Technical Advisor 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. The requirement for the Shift Technical Advisor becomes effective on January 1, 1981.
3. The Station Manager is responsible for ensuring that retraining and replacement training programs for the facility staff are maintained and that such programs meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the SEC staff.
4. Each on duty shift shall be composed of at least the minimum shift crew composition for each unit as shown in Table 6.1-1.
5. A health physics technician shall be on site when fuel is in the reactor.
6. A Fire Brigade 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 Table 6.1-1 of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.

7. A training program for the Fire Brigade shall be maintained under the direction of a Fire Marshall and shall meet or exceed the requirements of the NFPA Code Section 27 (1975), except that a training session and drill shall be held at least once per 92 days.
8. The health physics technician and Fire Brigade composition of Specifications 6.1.B.5 and 6.1.B.6 may be less than the minimum requirement for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

TABLE 6.1-1MINIMUM SHIFT CREW COMPOSITION

| POSITION | NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION |                        |  |
|----------|---|------------------------|--|
|          | ONE UNIT<br>OPERATING                           | TWO UNITS<br>OPERATING | TWO UNITS IN COLD<br>SHUTDOWN OR REFUELING |
| SS       | 1   | 1                      | 1  |
| SRO      | 1   | 1                      | None                                       |
| RO       | 3   | 3                      | 2  |
| AO       | 3   | 3                      | 3  |
| STA      | 1   | 1                      | None                                       |

TABLE 6.1-1 (Continued)

|     |   |   |
|-----|---|---|
| SS  | - | Shift Supervisor with a Senior Reactor Operators License. |
| SRO | - | Individual with a Senior Reactor Operators License.       |
| RO  | - | Individual with a Reactor Operators License.              |
| AO  | - | Auxiliary Operator  |
| STA | - | Shift Technical Advisor                                   |

Except for the Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 6.1-1 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 6.1-1. 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 Shift Supervisor from the Control Room while the unit is in operation, an individual (other than the Shift Technical Advisor) with a valid SRO license shall be designated to assume the Control Room command function. During any absence of the Shift Supervisor from the Control Room while the unit is shutdown or refueling, an individual with a valid RO license (other than the Shift Technical Advisor) shall be designated to assume the Control Room command functions.

- 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 Operating 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 |
| Member:        | Supervisor-Health Physics         |

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. Review of facility operations to detect potential nuclear safety hazards.
8. Performance of special reviews, investigations or analyses and report thereon as requested by the Chairman of the Station Nuclear Safety and Operating Committee.



9. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.
10. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Station Nuclear Safety and Operating Committee.

g. Authority

The SNSOC shall:

1. Recommend to the Station Manager written approval or disapproval of items considered under (1) through (4) above.
2. Render determinations in writing with regard to whether or not each item considered under (1) through (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 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

SEC 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 individuals who qualify as staff specialists. Each SEC staff specialist shall have an academic degree in an engineering or physical science field and, in addition, shall have a minimum of five years technical experience in one or more areas given in Specification 6.1.C.2.a.

### c. Consultants

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

d. Meeting Frequency

The SEC staff shall meet at least once per calendar month for the purpose of fostering interaction of reviews regarding safety-related operational activities.

e. Review

The following subjects shall be reviewed by SEC:

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 Director-Safety Evaluation and Control 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. The Quality Assurance audit program at least once per calendar year and audit reports.

6. Any other matter involving safe operation of the nuclear power stations which is referred to the Director-Safety Evaluation and Control by the Station Nuclear Safety and Operating Committee.
7. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

e. Authority

The Director-Safety Evaluation and Control shall report to and advise the Manager-Nuclear Technical Services, who shall advise the Vice President-Nuclear Operations on those areas of responsibility specified in Section 6.1.C.2.d.

f. Records

Records of SEC activities required by Specification 6.1.C.2.e shall be prepared and maintained in the SEC files and a summary shall be disseminated as indicated below each calendar month.

1. Vice President-Nuclear Operations
2. Nuclear Power Station Managers
3. Manager-Nuclear Operations and Maintenance
4. Manager-Nuclear Technical Services
5. Manager-Quality Assurance, Operations
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:

1. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least one per calendar year.
2. The performance, training and qualifications of the entire facility staff at least once per calendar year.
3. 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.
4. 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.
5. The Station Emergency Plan and implementing procedures at least once per two calendar years.

6. The Station Security Plan and implementing procedures at least once per two calendar years.
7. Any other area of facility operation considered appropriate by the Executive Manager-Quality Assurance or the Senior Vice President-Power Operations.
8. The Station Fire Protection Program and implementing procedures at least once per two calendar years.
9. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per calendar year utilizing either qualified offsite licensee personnel or an outside fire protection firm.
10. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per three calendar years.

b. Authority

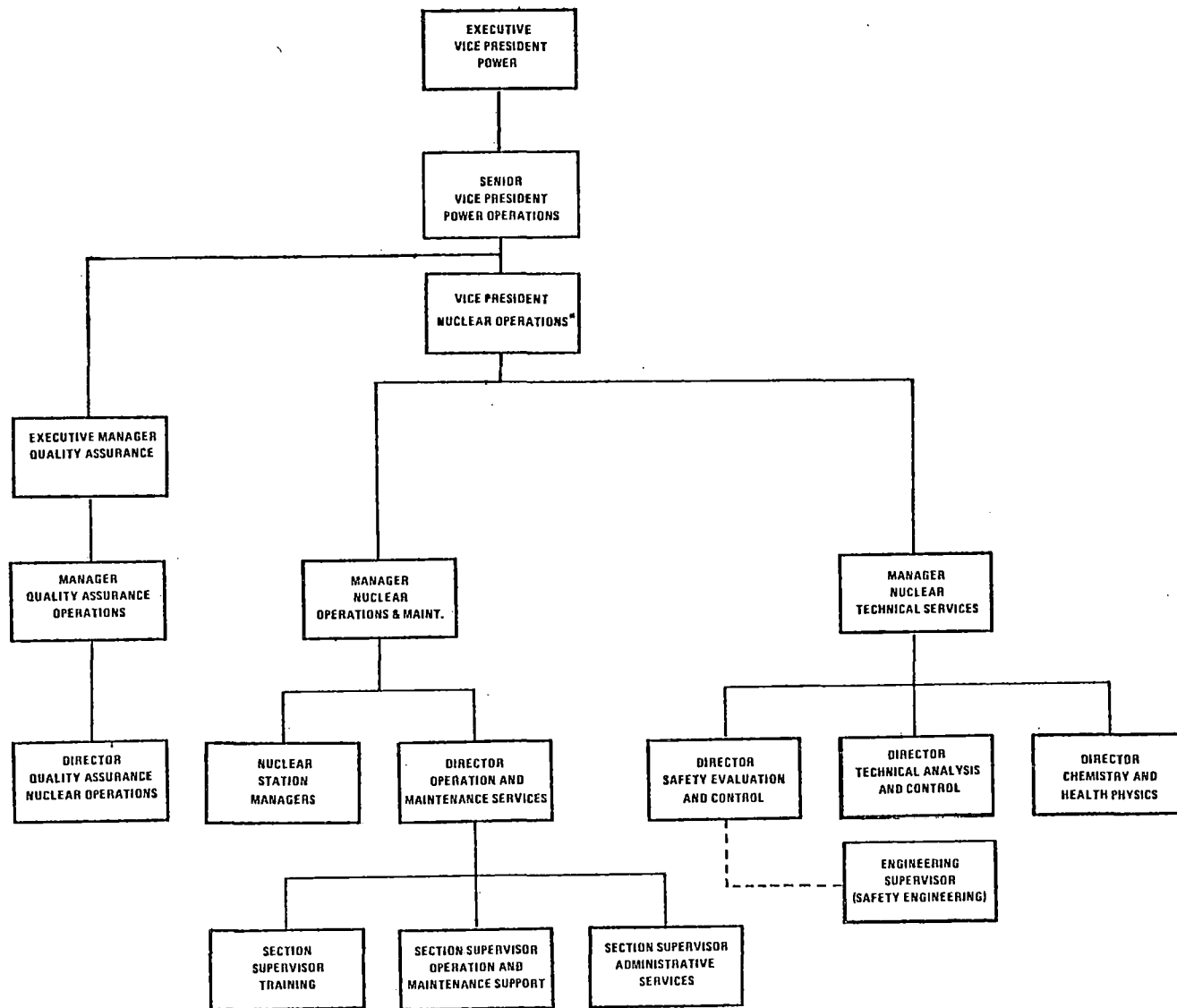
The Quality Assurance Department shall report to and advise the Executive Manager-Quality Assurance, who shall advise the Senior Vice President-Power Operations on those areas of responsibility specified in 6.1.C.3.a above.

## c. Records

Records of the Quality Assurance Department audits shall be prepared and maintained in the department files. Audit reports shall be disseminated as indicated below:

1. Nuclear Power Station Manager
2. Manager-Nuclear Operations and Maintenance
3. Manager-Nuclear Technical Services
4. Manager-Quality Assurance, Operations
5. Director-Quality Assurance, Nuclear Operations
6. Director - Safety Evaluation and Control
7. Supervisor of area audited
8. Nuclear Power Station Resident Quality Control Engineer

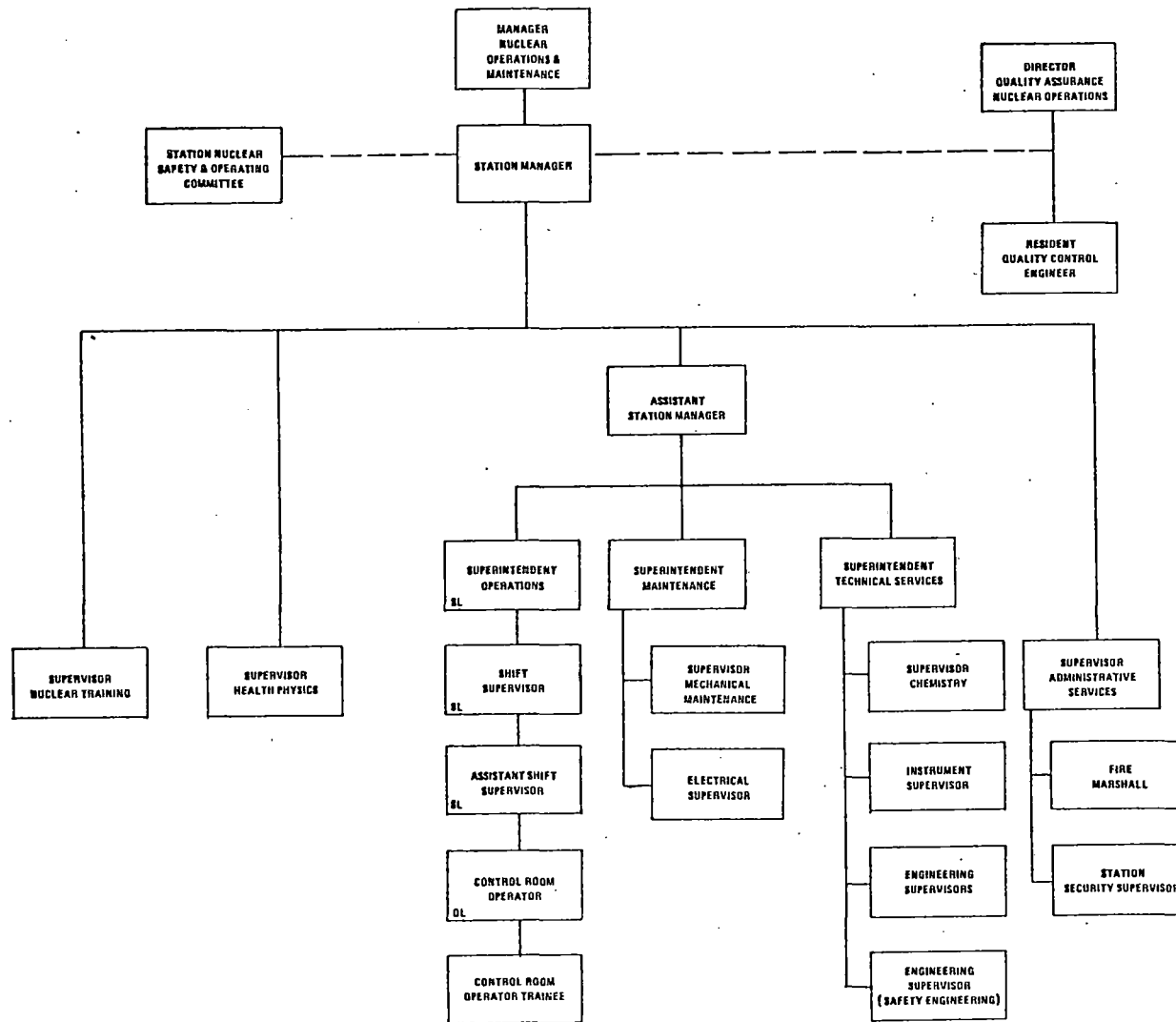




\*RESPONSIBLE FOR CORPORATE FIRE PROTECTION PROGRAM

Offsite Organization for Facility Management and Technical Support

# SURRY POWER STATION ORGANIZATION CHART



## LEGEND

SL - SENIOR LICENSE  
OL - OPERATOR'S LICENSE  
... - COMMUNICATIONS

6.2 ACTION TO BE TAKEN IN THE EVENT OF A REPORTABLE OCCURRENCE 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 Director-Safety Evaluation and Control and the Manager-Nuclear Operations and Maintenance.

### 6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED

#### Speciication

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 within one hour.
2. The Safety Limit violation shall be reported to the Commission, the Manager-Nuclear Operations and Maintenance, and the Director-Safety Evaluation and Control 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 Director-Safety Evaluation and Control, and the Manager-Nuclear Operations and Maintenance within 14 days of the violation.

DISCUSSION OF  
PROPOSED TECHNICAL SPECIFICATION CHANGE  
SURRY POWER STATION

As a result of the management reorganization of April 1, 1980, changes to Section 6.0 ADMINISTRATIVE CONTROLS are required to reflect the organization of a Nuclear Operations and Maintenance Department and a Nuclear Technical Services Department. By our license amendment request dated March 31, 1980 (Serial No. 297), we proposed changes to the Surry Power Station Technical Specifications to reflect the organization of a Nuclear Operations Department. The April 1, 1980 organization changes were revised in our license amendment application dated August 4, 1980 (Serial No. 671) to reflect the addition of an Assistant Station Manager to the Station organization. The above changes were further revised by our license amendment submittal dated August 28, 1980 (Serial No. 732), which proposes the implementation of an independent safety review group and the deletion of the existing System Nuclear Safety and Operating Committee. In order to provide the NRC Staff with a complete, consistent, and up-to-date package of proposed organization changes, the changes outlined above have been consolidated in a "master package" for submittal to the Staff. The "master package" also reflects changes to Section 6.0 resulting from the TMI Lessons Learned Category A changes previously submitted to the Staff for review by our license amendment request dated November 14, 1980 (Serial No. 915). The "master package" is discussed below.

Technical Specifications Figure 6.1-1 has been revised to show the new structure of the offsite organization for facility management and technical support. Information provided by Figure 6.1-1 was previously provided by Figures 6.1-1 and 6.1-2. The previous positions of Senior Vice President-Power and Vice President-Power Supply and Production Operations have been deleted from the Technical Specifications. The deleted positions have been replaced by the Executive Vice President-Power, the Senior Vice President-Power Operations, and the Vice President-Nuclear Operations. All previous references to the Senior Vice President-Power and Vice President-Power Supply and Production Operations positions have been revised to reference either the Senior Vice President-Power Operations or the Vice President-Nuclear Operations positions.

As indicated by Figure 6.1-1, the Manager-Nuclear Operations and Maintenance and the Manager-Nuclear Technical Services replace the previous position of Director-Nuclear Operations. Both managers will report to the Vice President-Nuclear Operations. The Manager-Nuclear Operations and Maintenance has responsibility for the supervision of the Nuclear Station Managers in the operation and maintenance of the Company's operational nuclear units. Both Nuclear Station Managers and the Director-Operation and Maintenance Services report to the Manager-Nuclear Operations and Maintenance. The Director-Operation and Maintenance Services is responsible for coordinating operational and maintenance support with nuclear unit activities. The Section Supervisor-Training, the Section Supervisor-Operation and Maintenance Support, and the Section Supervisor - Administrative Services will report to the Director-Operation and Maintenance Services.

The Manager-Nuclear Technical Services has responsibility for technical services activities required to support the Company's operational nuclear units. Reporting to the Manager-Nuclear Technical Services are the Director-Chemistry and Health Physics, the Director-Technical Analysis and Control, and the Director-Safety Evaluation and Control. The Director-Chemistry and Health Physics will provide support to the nuclear stations in the areas of chemistry and health physics. The Director-Technical Analysis and Control is responsible for furnishing support for station design modifications and responses to NRC requirements. The Director-Safety Evaluation and Control, who is responsible for offsite safety review of nuclear power station operations, is discussed in greater detail below.

The August 28, 1980 submittal (Serial No. 732) proposed the transfer of the independent review responsibility from the existing System Nuclear Safety and Operating Committee (SyNSOC) to the Safety Evaluation and Control (SEC) staff and proposed the transfer of the System Nuclear Safety and Operating Committee audit responsibility to the Quality Assurance Department.

The Safety Evaluation and Control staff will be composed of a Director and a minimum of three staff members qualified to perform independent reviews. The Director-Safety Evaluation and Control will report to the Manager-Nuclear Technical Services, who will advise the Vice President-Nuclear Operations on the activities of the Safety Evaluation and Control staff. This organizational structure will assure that sufficient attention is directed towards examination and evaluation of safety concerns and that management is cognizant of the results of these Safety Evaluation and Control staff reviews.

The Safety Evaluation and Control staff will provide the independent reviews of station operational activities required by ANSI N18.7-1976/ANS 3.2 (Administrative Controls and Quality Assurance Program for Operational Nuclear Power Plants), which are presently provided by the System Nuclear Safety and Operating Committee. The advantages of this proposed change are threefold.

First, the Safety Evaluation and Control staff is composed of individuals with direct nuclear experience in their respective technical disciplines. Presently, Safety Evaluation and Control staff specialists meet or exceed the criteria proposed in Technical Specification 6.1.C.2.b. The proposed requirement in Specification 6.1.C.2.b exceeds the criteria for review "staff specialists" established in ANSI N18.1-1971/ANS 3.1-1978 (Standard For Selection and Training of Personnel for Nuclear Power Plants) and meets the present qualification position of the Commission. Additionally, the Director-Safety Evaluation and Control exceeds the criteria established by ANSI N18.1-1971/ANS 3.1-1978 for the Supervisor of an independent review staff. Future Safety Evaluation and Control staff members may not meet the qualification criteria for "staff specialists" positions; however, such individuals will not be directly responsible for the independent review function of Safety Evaluation and Control.

Secondly, the independent reviews of station operational activities by the Safety Evaluation and Control staff will be performed on a continuous basis as part of their routine responsibilities. This is in contrast to an intermittent or scheduled review committee approach; therefore, the Safety Evaluation and Control reviews will be responsive to station time constraints while also providing a more comprehensive review of items presently processed by the System Nuclear Safety and Operating Committee.

Finally, other Safety Evaluation and Control staff routine responsibilities require continuous review of industry-wide operational experience, technical information, and regulatory issues. This effort should maintain a high level of "state-of-the-art" expertise within Safety Evaluation and Control regarding operational activities and general industry concerns. It is anticipated that the Safety Evaluation and Control staff will provide the majority of the expertise necessary to perform independent review activities; however, technical consultants and in-house specialists will be utilized for special concerns when Safety Evaluation and Control review requires additional expertise.

As a result of this change, safety will be enhanced by the proposed transfer of independent review responsibilities from the System Nuclear Safety and Operating Committee to the Safety Evaluation and Control staff by upgrading the quality and timely processing of the independent reviews of station operational activities.

Specification 6.1.C.2.i for Surry Units No. 1 and No. 2 requires the performance of audits of station activities under the cognizance of the System Nuclear Safety and Operating Committee. As a result of this proposed change, the audit responsibilities outlined in Specification 6.1.C.3.a, which are presently being performed under the cognizance of the System Nuclear Safety and Operating Committee by the Quality Assurance Department, will be transferred to the Quality Assurance Department. Such a transfer will provide for appropriate organizational channels for the reporting of audit results, ensure the availability of appropriate technical expertise for the performance of these audits, and ensure that these audits are performed in an effective and timely manner.

NRC Staff comments received relating to the acceptability of the August 28, 1980 submittal were concerned with the sections (1) on the SEC staff composition and qualification requirements, (2) on the SEC staff meeting requirement (which was omitted from the August 28, 1980 submittal), (3) on technical items to be reviewed by SEC, and (4) on the SNSOC review section. In order to address these NRC concerns, proposed changes are enclosed which incorporate (1) requirements for a monthly meeting of the SEC staff, (2) requirements for an academic degree and five years technical experience to qualify as a SEC staff specialist, (3) requirements for the review of the Quality Assurance Department audit program, (4) revisions to Specifications 6.1.C.1.f and 6.3 and to make those sections identical to the comparable North Anna sections, and (5) revisions to the distribution of Quality Assurance Department audit reports.

As a result of the reorganization of the Licensing and Quality Assurance Department, the Licensing function has been transferred to Safety Evaluation and Control and the Quality Assurance organization has been restructured. The Executive Manager-Quality Assurance will be responsible for the quality assurance effort encompassing the areas of engineering, construction, and operational activities of both the fossil and the nuclear stations. He will also be responsible for the area of corporate emergency response planning and implementation. The Executive Manager-Quality Assurance will report to the Senior Vice President-Power Operations. The Manager-Quality Assurance, Operations will be responsible for implementing quality assurance programs which are related to the operational activities of the fossil and nuclear power

stations. He will report to the Executive Manager-Quality Assurance. The Director-Quality Assurance, Nuclear Operations will be responsible for the implementation of quality assurance programs which are related to the operational activities associated with the nuclear power stations. He will report to the Manager-Quality Assurance, Operations.

The organization charts for the Appendix "A" Technical Specifications for Surry have been revised to reflect the restructuring of the Quality Assurance Department and changes to other organization titles. The previous title of Executive Manager-Licensing and Quality Assurance has been revised to Executive Manager-Quality Assurance. In addition, the positions of Manager-Quality Assurance, Operations and Director-Quality Assurance, Nuclear Operations are shown on the organization chart; however, those positions of the Quality Assurance Department which have no direct responsibility pertaining to the operation of the nuclear stations have not been shown on the Technical Specifications organization chart or referenced in the text of the Specifications.

Technical Specification Figure 6.1-2 has been revised to show the new structure of the Surry Power Station organization. Figure 6.1-3, which previously provided this information, has been deleted. As explained above, the Station Manager reports to the Manager-Nuclear Operations and Maintenance. Our August 4, 1980 submittal (Serial No. 671) proposes revising Section 6.0 to add the new position of Assistant Station Manager to the Surry Power Station organization. The Assistant Station Manager will be directly responsible for the safe operation and maintenance of the power station. He will serve in a coordinating capacity to the Station Manager for the off-site activities of the Station. During the absence of the Station Manager, the Assistant Manager will act as the Station Manager. The Assistant Station Manager will also be the Vice Chairman of the Station Nuclear Safety and Operating Committee (SNSOC). The Superintendent-Operations, the Superintendent-Maintenance, and the Superintendent-Technical Services will report to the Assistant Station Manager. All three of these superintendents will remain members of the SNSOC.

The positions of Operating Supervisor and Auxiliary Operator have been eliminated from the organization chart. In addition, the position title of Assistant Control Room Operator has been revised to Control Room Operator Trainee. The positions of Maintenance Coordinator and Mechanical Supervisor have been replaced on the station organization chart by the position of Supervisor-Mechanical Maintenance. Both the Maintenance Coordinator and the Mechanical Supervisor report to the Supervisor-Mechanical Maintenance. Other title changes made to the organization chart include the change of Supervisor-Safety Engineering to Engineering Supervisor (Safety Engineering), the change of Engineering Supervisor to Engineering Supervisors to reflect the two positions of Engineering Supervisor-Performance and Tests and Engineering Supervisor-Design Changes and Projects and, the change of Training Supervisor to Supervisor-Nuclear Training. The Supervisor-Health Physics position has been shifted such that he will now report directly to the Station Manager instead of reporting to the Superintendent-Technical Services. The positions of Supervisor-Nuclear Training and Supervisor-Administrative Services will also report to the Station Manager.



An appraisal of the North Anna health physics program was conducted by the NRC office of Inspection and Enforcement during the period of May 5-16, 1980. The results of this appraisal were forwarded in a letter to Mr. J. H. Ferguson dated September 15, 1980 (Serial No. 787). One of the NRC recommendations resulting from the program review is that the Supervisor-Health Physics be added as a member of the Station Nuclear Safety and Operating Committee (SNSOC). The Supervisor-Health Physics was previously a member of the SNSOC; however, he was deleted as a required SNSOC member as a result of Proposed Technical Specification Change No. 71, which was approved and issued by the NRC as Amendment No. 53 and No. 52 for Surry Unit 1 and Unit 2 respectively. In order to address this concern, the proposed change is to reinstate the Supervisor-Health Physics as a member of the SNSOC. Since many operations at the station involve the health physics group in some capacity, the addition of the Supervisor-Health Physics will improve the quality of SNSOC reviews by adequately appraising the impact of radiation safety on station activities.

The proposed Technical Specification Changes to incorporate TMI-2 Lessons Learned Category A changes, which were submitted by our letter dated November 14, 1980 (Serial No. 915), are reflected in the attached pages. These changes revised the minimum shift crew manning table and incorporated requirements related to the Shift Technical Advisor.