

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Safety and Operation Review
Specification

- A. The Station Manager shall be responsible for the overall operation of the facility. In his absence, the Assistant Station Manager (Operations and Maintenance) shall be responsible for the safe operation of the facility. During the absence of both, the Station Manager will delegate in writing the succession to this responsibility.

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.

1. 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 UFSAR and updated in accordance with 10 CFR 50.71(e).
 2. There shall be an individual executive position (corporate officer) in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
 3. There shall be an individual management position in the onsite organization having responsibility for overall facility safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
 4. The management position responsible for training of the operating staff and the position responsible for the quality assurance functions shall have sufficient organizational freedom including sufficient independence from cost and schedule when opposed to safety considerations.
 5. The management position responsible for health physics shall have direct access to that onsite individual having responsibility for overall facility 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.
- B. The facility organization shall conform to the following requirements:
1. Each member of the facility staff shall meet or exceed the minimum qualifications of ANS 3.1 (12/79 Draft)* for comparable positions, and the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees, except for the Superintendent - Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

*Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, "Quality Assurance Program, Operations Phase."

f. Responsibilities

The SNSOC shall be responsible for:

1. Review of a) all proposed normal, abnormal, and emergency operating procedures and all proposed maintenance procedures and changes thereto, b) 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 that affect nuclear safety.
3. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
4. Review of proposed changes to Technical Specifications and shall submit recommended changes to the Station Manager.
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 corporate officer responsible for overall plant nuclear safety and to the offsite management position responsible for independent/operational event review.
6. Review of all Reportable Events and special reports submitted to the NRC.
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 SNSOC or Station Manager.

9. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Station Manager.
10. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Station Manager.
11. Review of every unplanned onsite release of radioactive material to the environs exceeding the limits of Specification 3.11, including the preparation or reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the corporate officer responsible for overall plant nuclear safety and to the offsite management position responsible for independent/operational event review.
12. Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.

g. Authority

The SNSOC shall:

1. Provide written approval or disapproval of items considered under (1) through (3) above. SNSOC approval shall be certified in writing by an Assistant Station Manager.
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 corporate officer responsible for overall plant nuclear safety and to the offsite management position responsible for independent/operational event review 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 corporate officer responsible for overall plant nuclear safety and to the offsite management position responsible for independent/operational event review.

2. Independent/Operational Event Review Group

a. Independent Review Function

The Independent/Operational Event Review 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 Independent/Operational Event Review (IOER) staff shall be composed of the offsite management position responsible for Independent/Operational Event Review and a minimum of three individuals who qualify as staff specialists. Each 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. These staff specialists shall not be directly involved in the licensing function.

c. Consultants

Consultants shall be utilized to provide expert advice to the IOER when determined to be appropriate.

d. Meeting Frequency

The IOER Staff shall meet at least once per calendar month for the purpose of fostering interaction of reviews regarding safety-related operational activities and related licensing activities.

e. Review

The following subjects shall be reviewed by IOER 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 offsite management position responsible for IOER by the Station Nuclear Safety and Operating Committee following its review prior to implementation.

6. Any other matter involving safe operation of the nuclear power stations which is referred to the offsite management position responsible for independent/operational event review.
7. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

f. Authority

The offsite management position responsible for independent/operational event review shall report through the established organization structure and advise the corporate officer responsible for overall plant nuclear safety on any safety concerns discovered during the independent review of those areas of responsibility specified in Section 6.1.C.2.e.

g. Records

Records of IOER activities required by Specification 6.1.C.2.e shall be prepared and maintained in the IOER files and a summary shall be disseminated each calendar month to the corporate officer responsible for overall plant nuclear safety, management position responsible for the quality assurance audit program, and other appropriate management personnel.

6. The Station Security Plan and implementing procedures at least once per 12 months.
7. Any other area of facility operation considered appropriate by the management position responsible for the quality assurance audit program or the corporate officer responsible for overall plant nuclear safety.
8. The Station Fire Protection Program and implementing procedures at least once per 24 months.
9. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months 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 36 months.
11. The radiological environmental monitoring program at least once per 12 months.
12. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.

13. The Process Control Program and implementing procedures for processing and packaging of radioactive waste at least once per 24 months.

b. Authority

The Quality Assurance Department shall advise the corporate officer responsible for overall plant nuclear safety 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 company files. Audit reports shall be disseminated to the corporate officer responsible for overall plant nuclear safety and the management position responsible for the areas audited.

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6.2 GENERAL NOTIFICATION AND REPORTING REQUIREMENTS

Specification

- A. The following actions shall be taken for Reportable Events:
1. A report shall be submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
 2. Each Reportable Event shall be reviewed by the SNSOC. The offsite management position responsible for independent/operational event review and the corporate officer responsible for overall plant nuclear safety shall be notified of the results of this review.
- B. Immediate notifications shall be made in accordance with Section 50.72 to 10 CFR Part 50.

6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDEDSpecification

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 1 hour.
2. The Safety Limit violation shall be reported to the Commission, the corporate officer responsible for overall plant nuclear safety, and the offsite management position responsible for independent/operational event review 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 offsite management position responsible for independent/operational event review and the corporate officer responsible for overall plant nuclear safety within 14 days of the violation.

ATTACHMENT 2

NORTH ANNA POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATIONS CHANGES

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Station Manager shall be responsible for overall facility operation. In his absence, the Assistance Station Manager (Operations and Maintenance) shall be responsible for overall facility operation. During the absence of both, the Station Manager shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Supervisor (or during his absence from the Control Room, a designated individual) shall be responsible for the Control Room command function and shall be the only individual that may direct the licensed activities of licensed operators. A management directive to this effect, signed by the senior corporate officer responsible for overall plant nuclear safety, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 Onsite and Offsite Organization

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 FSAR and updated in accordance with 10 CFR 50.71(e).
- b. There shall be an individual executive position (corporate officer) in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
- c. There shall be an individual management position in the onsite organization having responsibility for overall facility safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- d. The management position responsible for training of the operating staff and the management position responsible for the quality assurance functions shall have sufficient organizational freedom including sufficient independence from cost and schedule when opposed to safety considerations.

- e. The management position responsible for health physics shall have direct access to that onsite individual having responsibility for overall facility 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.

FACILITY STAFF

6.2.2 The Facility organization shall be as shown in the UFSAR.

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least once licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODES 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.
- c. A health physics technician# shall be onsite when fuel is in the reactor.
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A Fire Brigade of at least 5 members shall be maintained onsite at all times#. The Fire Brigade shall not include the minimum shift crew shown in Table 6.2-1 or any personnel required for other essential functions during a fire emergency.

#The health physics technician and Fire Brigade composition may be less than the minimum requirements 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.

6.2.3 NUCLEAR SAFETY ENGINEERING (NSE)

FUNCTION

6.2.3.1 NSE shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 NSE shall be composed of at least five dedicated, full-time engineers located onsite.

RESPONSIBILITIES

6.2.3.3 NSE shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

6.2.3.4 NSE shall disseminate relevant operational experience.

AUTHORITY

6.2.3.5 The NSE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Assistant Station Manager (Nuclear Safety and Licensing).

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

*Not responsible for sign-off function

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NORTH ANNA - UNIT 1

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MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the SNSOC consists of the Chairman or Vice-Chairman and two members including alternates.

RESPONSIBILITIES

6.5.1.6 The SNSOC shall be responsible for:

- a. Review of 1) all procedures required by Specifications 6.8.1, 6.8.2 and 6.8.3 and changes thereto, 2) all programs required by Specification 6.8.4 and changes thereto, 3) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- d. Review of all proposed changes to Appendix "A" Technical Specifications and Appendix "B" Environmental Protection Plan. Recommend changes shall be submitted to the Station Manager.
- 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 corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for independent/operational event review.
- f. Review of all REPORTABLE EVENTS and Special Reports.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Station Nuclear Safety and Operating Committee or Station Manager.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Station Manager.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Station Manager.

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- k. Review of every unplanned onsite release of radioactive material to the environs 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 corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for independent/operational event review.
- l. Review changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

6.5.1.7 The SNSOC shall:

- a. Provide written approval or disapproval of items considered under 6.5.1.6(a) through (c) above. SNSOC approval shall be certified in writing by an Assistant Station Manager.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the corporate officer responsible for overall nuclear plant safety and the offsite management position responsible for independent/operational event review of disagreement between the SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Station Manager, the corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for independent/operational event review.

6.5.2 INDEPENDENT/OPERATIONAL EVENT REVIEW (IOER) GROUP

FUNCTION

6.5.2.1 The IOER Group shall function to provide independent review 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
- h. Administrative controls and quality assurance practices
- i. Other appropriate fields associated with the unique characteristics of the nuclear power plant.

COMPOSITION

6.5.2.2 The IOER Group staff shall be composed of the offsite management position responsible for IOER and a minimum of three individuals who are qualified as staff specialists. Each IOER 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 6.5.2.1. These staff specialists shall not be directly involved in the licensing function.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the offsite management position responsible for IOER to provide expert advice to the IOER.

MEETING FREQUENCY

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

REVIEW

6.5.2.7 The following subjects shall be reviewed by the IOER Group.

- a. 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.
- b. 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 offsite management position responsible for IOER by the Station Nuclear Safety and Operating Committee following its review prior to implementation.
- c. 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.

- d. Violations, REPORTABLE EVENTS and Special Reports such as:
 - 1. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance;
 - 2. Significant operating abnormalities or deviations from normal or expected performance of station safety-related structures, systems, or components; and
 - 3. ALL REPORTABLE EVENTS submitted in accordance with Section 50.73 to 10 CFR Part 50 and Special Reports required by Specification 6.9.2.

Review of events covered under this paragraph shall include the results of any investigations made and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.
- e. The Quality Assurance Department audit program at least once per 12 months and audit reports.
- f. Any other matter involving safe operation of the nuclear power stations which is referred to the offsite management position responsible for IOER.
- g. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

AUTHORITY

6.5.2.9 The offsite management position responsible for IOER shall report through the established organization structure and advise the corporate officer responsible for overall plant nuclear safety on any safety concerns discovered during the independent review of those areas of responsibility specified in Section 6.5.2.7.

RECORDS

6.5.2.10 Records of IOER Group activities required by Section 6.5.2.7 shall be prepared and maintained in the IOER Group files and a summary shall be disseminated each calendar month to the corporate officer responsible for overall plant nuclear safety, the management position responsible for the quality assurance audit program, and other appropriate management personnel.

6.5.3 QUALITY ASSURANCE DEPARTMENT

FUNCTION

6.5.3.1 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 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 Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Station Emergency Plan and implementing procedures at least once per 12 months.
- f. The Station Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the management position responsible for the quality assurance audit program or the corporate officer responsible for overall plant nuclear safety.
- h. The Station Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. 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 36 months.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

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- m. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

AUTHORITY

6.5.3.2 The Quality Assurance Department shall advise the corporate officer responsible for overall plant nuclear safety on those areas of responsibility specified in Section 6.5.3.1.

RECORDS

6.5.3.3 Records of the Quality Assurance Department audits shall be prepared and maintained in the company files. Audit reports shall be disseminated to the corporate officer responsible for overall plant nuclear safety and the management position responsible for the areas audited.

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 SNSOC and the results of this review shall be submitted to the corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for IOER.

6.7 SAFETY LIMIT VIOLATION

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

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for IOER shall be notified within 24 hours.
- c. 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.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for IOER within 14 days of the violation.

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.
- b. Refueling operations.

- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of 6.8.1 above, except 6.8.1.d and 6.8.1.e and changes thereto, shall be reviewed and approved by the SNSOC prior to implementation and reviewed periodically as set forth in administrative procedures. Procedures of 6.8.1.d and 6.8.1.e shall be reviewed and approved as per 6.5.1.6.i and 6.5.1.6.j. SNSOC approval shall be certified in writing by an Assistant Station Manager.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed, and approved by the SNSOC within 14 days of implementation. SNSOC approval shall be certified in writing by an Assistant Station Manager.

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 recirculation spray, safety injection, chemical and volume control, gas stripper, and hydrogen recombiners. The program shall include the following:

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

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Station Manager shall be responsible for overall facility operation. In his absence, the Assistance Station Manager (Operations and Maintenance) shall be responsible for overall facility operation. During the absence of both, the Station Manager shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Supervisor (or during his absence from the Control Room, a designated individual) shall be responsible for the Control Room command function and shall be the only individual that may direct the licensed activities of licensed operators. A management directive to this effect, signed by the senior corporate officer responsible for overall plant nuclear safety, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 Onsite and Offsite Organization

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 FSAR and updated in accordance with 10 CFR 50.71(e).
- b. There shall be an individual executive position (corporate officer) in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
- c. There shall be an individual management position in the onsite organization having responsibility for overall facility safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- d. The management position responsible for training of the operating staff and the management position responsible for the quality assurance functions shall have sufficient organizational freedom including sufficient independence from cost and schedule when opposed to safety considerations.

- e. The management position responsible for health physics shall have direct access to that onsite individual having responsibility for overall facility 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.

FACILITY STAFF

6.2.2 The Facility organization shall be as shown in the UFSAR.

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least once licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODES 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.
- c. A health physics technician# shall be onsite when fuel is in the reactor.
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A Fire Brigade of at least 5 members shall be maintained onsite at all times#. The Fire Brigade shall not include the minimum shift crew shown in Table 6.2-1 or any personnel required for other essential functions during a fire emergency.

#The health physics technician and Fire Brigade composition may be less than the minimum requirements 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.

ADMINISTRATIVE CONTROLS

6.2.3 NUCLEAR SAFETY ENGINEERING (NSE)

FUNCTION

6.2.3.1 NSE shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 NSE shall be composed of at least five dedicated, full-time engineers located onsite.

RESPONSIBILITIES

6.2.3.3 NSE shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

6.2.3.4 NSE shall disseminate relevant operational experience.

AUTHORITY

6.2.3.5 The NSE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Assistant Station Manager (Nuclear Safety and Licensing).

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

*Not responsible for sign-off function

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ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the SNSOC consists of the Chairman or Vice-Chairman and two members including alternates.

RESPONSIBILITIES

6.5.1.6 The SNSOC shall be responsible for:

- a. Review of 1) all procedures required by Specifications 6.8.1, 6.8.2 and 6.8.3 and changes thereto, 2) all programs required by Specification 6.8.4 and changes thereto, 3) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- d. Review of all proposed changes to Appendix "A" Technical Specifications and Appendix "B" Environmental Protection Plan. Recommend changes shall be submitted to the Station Manager.
- 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 corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for independent/operational event review.
- f. Review of all REPORTABLE EVENTS and Special Reports.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Station Nuclear Safety and Operating Committee or Station Manager.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Station Manager.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Station Manager.

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- k. Review of every unplanned onsite release of radioactive material to the environs 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 corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for independent/operational event review.
- l. Review changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

6.5.1.7 The SNSOC shall:

- a. Provide written approval or disapproval of items considered under 6.5.1.6(a) through (c) above. SNSOC approval shall be certified in writing by an Assistant Station Manager.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the corporate officer responsible for overall nuclear plant safety and the offsite management position responsible for independent/operational event review of disagreement between the SNSOC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The SNSOC shall maintain written minutes of each meeting and copies shall be provided to the Station Manager, the corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for independent/operational event review.

6.5.2 INDEPENDENT/OPERATIONAL EVENT REVIEW (IOER) GROUP

FUNCTION

6.5.2.1 The IOER Group shall function to provide independent review 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
- h. Administrative controls and quality assurance practices
- i. Other appropriate fields associated with the unique characteristics of the nuclear power plant

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COMPOSITION

6.5.2.2 The IOER Group staff shall be composed of the offsite management position responsible for IOER and a minimum of three individuals who are qualified as staff specialists. Each IOER 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 6.5.2.1. These staff specialists shall not be directly involved in the licensing function.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the offsite management position responsible for IOER to provide expert advice to the IOER.

MEETING FREQUENCY

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

REVIEW

6.5.2.7 The following subjects shall be reviewed by the IOER Group.

- a. 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.
- b. 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 offsite management position responsible for IOER by the Station Nuclear Safety and Operating Committee following its review prior to implementation.
- c. 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.

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- d. Violations, REPORTABLE EVENTS and Special Reports such as:
1. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance;
 2. Significant operating abnormalities or deviations from normal or expected performance of station safety-related structures, systems, or components; and
 3. ALL REPORTABLE EVENTS submitted in accordance with Section 50.73 to 10 CFR Part 50 and Special Reports required by Specification 6.9.2.
- Review of events covered under this paragraph shall include the results of any investigations made and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.
- e. The Quality Assurance Department audit program at least once per 12 months and audit reports.
- f. Any other matter involving safe operation of the nuclear power stations which is referred to the offsite management position responsible for IOER.
- g. Reports and meeting minutes of the Station Nuclear Safety and Operating Committee.

AUTHORITY

6.5.2.9 The offsite management position responsible for IOER shall report through the established organization structure and advise the corporate officer responsible for overall plant nuclear safety on any safety concerns discovered during the independent review of those areas of responsibility specified in Section 6.5.2.7.

RECORDS

6.5.2.10 Records of IOER Group activities required by Section 6.5.2.7 shall be prepared and maintained in the IOER Group files and a summary shall be disseminated each calendar month to the corporate officer responsible for overall plant nuclear safety, the management position responsible for the quality assurance audit program, and other appropriate management personnel.

6.5.3 QUALITY ASSURANCE DEPARTMENT

FUNCTION

6.5.3.1 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 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 Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Station Emergency Plan and implementing procedures at least once per 12 months.
- f. The Station Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the management position responsible for the quality assurance audit program or the corporate officer responsible for overall plant nuclear safety.
- h. The Station Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. 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 36 months.

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- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

AUTHORITY

6.5.3.2 The Quality Assurance Department shall advise the corporate officer responsible for overall plant nuclear safety on those areas of responsibility specified in Section 6.5.3.1.

RECORDS

6.5.3.3 Records of the Quality Assurance Department audits shall be prepared and maintained in the company files. Audit reports shall be disseminated to the corporate officer responsible for overall plant nuclear safety and the management position responsible for the areas audited.

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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 SNSOC and the results of this review shall be submitted to the corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for IOER.

6.7 SAFETY LIMIT VIOLATION

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

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for IOER shall be notified within 24 hours.
- c. 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.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the corporate officer responsible for overall plant nuclear safety and the offsite management position responsible for IOER within 14 days of the violation.

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.
- b. Refueling operations.

- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of 6.8.1 above, except 6.8.1.d and 6.8.1.e and changes thereto, shall be reviewed and approved by the SNSOC prior to implementation and reviewed periodically as set forth in administrative procedures. Procedures of 6.8.1.d and 6.8.1.e shall be reviewed and approved as per 6.5.1.6.i and 6.5.1.6.j. SNSOC approval shall be certified in writing by an Assistant Station Manager.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed, and approved by the SNSOC within 14 days of implementation. SNSOC approval shall be certified in writing by an Assistant Station Manager.

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 recirculation spray, safety injection, chemical and volume control, gas stripper, and hydrogen recombiners. The program shall include the following:

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

ATTACHMENT 3

DISCUSSION AND SIGNIFICANT
HAZARDS CONSIDERATIONS EVALUATION

Discussion

The proposed changes detailed in the "Description of Changes" concern the replacement of the organization charts and certain corporate level position titles currently in the Technical Specifications (TS) with more general organizational requirements and position descriptions. The proposed changes also include revisions to certain administrative requirements which will bring Section 6.0 of the TS into closer conformance with the currently acceptable TS for Westinghouse plants. Most of the organizational elements are already required by regulation, other TS sections, or the updated Final Safety Analysis Report. The general requirements specified in these proposed changes capture the essence of those organizational features presently depicted on the organization charts or by the existing use of position titles that are important to ensuring that the power stations will be operated safely.

10CFR50.36, "Technical Specifications," was issued in 1968. This rule delineates the requirements for determining the contents of TS. With respect to administration controls, 10CFR50.36c(5) states in part:

"Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner."

During the plant licensing process, the NRC makes a finding that the applicant's staff is capable of operating the plant safely. Past practice has been to include organization charts in the TS so that changes made after the operating license was issued would require approval. Nevertheless, the regulations cited above do not specifically require that TS contain organization charts and/or organizational titles.

Organization charts do, however, depict the reporting chain for some organizational functions that must be independent of scheduling and operating pressures. Until 10CFR50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," was promulgated in 1970, organization charts in TS provided a means of assuring the NRC that the proper reporting chain had been implemented. 10CFR50, Appendix B, Criterion I, "Organization," states in part that:

"Such persons and organizations performing quality assurance functions shall report to a management level such that this required authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations, are provided."

Appendix B further acknowledges that the organizational structures may take different forms, but emphasizes that regardless of structure, the individuals assigned the responsibility for execution of any portion of the program shall have access to such levels of management as may be necessary to perform this function. Accordingly, our required QA Program describes these organizational relationships in as much or more detail than currently exists in the TS.

The primary safety issue associated with this change request is whether there can be reasonable assurance that the Virginia Electric and Power Company

organization will operate the North Anna and Surry Power Stations safely and remain effective without requiring prior staff approval for changes reflected by organization charts and position titles. We have concluded that organization charts and/or titles by themselves play little or no role in assessing the safety significance of changes to the plants or licenses. Conversely, specific operational requirements that do bear more directly on safety matters of concern than the organization charts and titles are explicitly provided elsewhere in the TS. For example, the organizational element responsible for control room command function is identified separately in the TS, as are the requirements for minimum staffing under various operating modes. The organizational management functions for independent reviews and audits, onsite safety review committee, and independent safety engineering group, while revised by this change request to conform more closely with the current acceptable TS for Westinghouse plants, are also specified in other parts of the TS. Therefore, the organization charts and certain position titles themselves are not needed to support any future finding that the Virginia Electric and Power organization will operate our plants safely.

After a thorough evaluation, we have determined that approval of the proposed changes are justified because these changes are administrative in nature and, as discussed above, do not affect safe plant operation. Accordingly, this change request is of the type described in the Federal Register notice of March 6, 1986 (51FR7744) as an example of amendments that are considered not likely to involve significant hazards considerations. Specifically, example (i), reiterated below, applies to this change request.

"A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature."

Furthermore, in addition to being required by the TS, the important organizational features illustrated by organization charts and certain position titles are also required or controlled by other mechanisms subject to NRC control. Specifically, the chapter entitled, "Conduct of Operations," of the updated North Anna and Surry Final Safety Analysis Reports contains the detailed organizational structure and a description of the conduct of operations. The information in this chapter is required by 10CFR50.71(e) to be maintained and updated annually. In addition, Virginia Electric and Power Company's Topical Report, "Quality Assurance Program Operations Phase," is required by 10CFR50, Appendix B, to include similar information relating to the organizational structure, and is required by 10CFR50.54 to be maintained current. Finally, previous organization changes had required the Company to process, and the NRC to review, unnecessary TS change requests. Deletion of the organization charts and certain position titles will eliminate this needless expenditure of resources for both organizations.

Description of Changes

Proposed changes to Section 6 of the North Anna and Surry Power Stations Technical Specifications are described as follows.

- o The organization charts are replaced by the following delineation of organizational requirements.

- 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, functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions or in equivalent forms of documentation. These organizational relationships will be maintained in a document such as the updated FSAR or QA Topical Report.
- b. There shall be an individual executive position (corporate officer) in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant so that continued nuclear safety is assured.
- c. There shall be an individual management position in the onsite organization having responsibilities for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- d. Although the individuals who train the operating staff and those who carry out the health physics and quality assurance functions may report to the appropriate manager on site, they shall have sufficient organizational freedom including sufficient independence from cost and schedule when opposed to safety considerations.
- o Certain position titles have been replaced with the following position descriptions.
 - a. Senior corporate officer responsible for the overall plant nuclear safety.
 - b. Corporate officer responsible for the overall plant nuclear safety.
 - c. Management position responsible for training of the operating staff.
 - d. Management position responsible for the quality assurance functions.
 - e. Management position responsible for health physics.
 - f. Offsite management position responsible for independent/operational event review.
 - g. Management position responsible for the quality assurance audit program.

- o The departmental name "Safety Evaluation and Control (SEC)" has been replaced by "Independent/Operational Event Review Group."
- o The following requirements have been revised to conform more closely to the corresponding requirements in the most current version of the TS for Westinghouse plants. These revisions also reflect the proposed position descriptions in lieu of position titles where appropriate. Accordingly, the intent of the original requirements remains unchanged.
 - a. "Authority" for the Independent/Operational Event Review Group.
 - b. "Records" for the Independent/Operational Event Review Group.
 - c. "Records" for the Quality Assurance Department.

Significant Hazards Consideration Evaluation

The proposed changes to the Technical Specifications involve no significant hazards considerations because operation of the North Anna and Surry Units 1 and 2 in accordance with these changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated, because the changes merely reflect administrative considerations and do not change the plant design or operation. As in the past, the NRC will continue to be informed of organizational changes through other required controls. The Code of Federal Regulations, Title 10, Part 50.34(b)(6)(i) requires that the applicant's organizational structure be included in the Final Safety Analysis Report. Accordingly, the "Conduct of Operations" chapter of the Updated Final Safety Analysis Reports provides a description of the organization and detailed organization charts. As required by 10CFR50.71(e), the Company submits annual updates to the updated FSAR. Appendix B to 10CFR50 and 10CFR50.54(a)(3) govern changes to organization described in the Quality Assurance Topical Report; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated, because, as above, plant design or operation is not affected by these changes; or
- (3) Involve a significant reduction in a margin of safety, because these changes do not alter the functions, responsibilities, or minimum shift crew composition of the staff as defined by the Administrative Controls of the Technical Specifications. Through strong Quality Assurance programs and commitment to maintain only qualified personnel in positions of responsibility, it is assured that safety functions performed by the on-site and the corporate organizations will continue to be performed at a high level of competence.

ATTACHMENT 4

VOUCHER CHECKS