

TABLE OF CONTENTS

<u>Section</u>	<u>Title</u>	<u>Page</u>
13.0	<u>CONDUCT OF OPERATIONS</u>	13.1-1
13.1	<u>ORGANIZATIONAL STRUCTURE OF APPLICANT</u>	13.1-1
13.1.1	Corporate Organization	13.1-1
13.1.1.1	Design Responsibilities	13.1-1
13.1.2	Nuclear Power	13.1-2
13.1.2.1	Offsite Organizations	13.1-2
13.1.2.2	Onsite Organization	13.1-2
13.1.3	Qualification Requirements for Nuclear Facility Personnel	13.1-2
	References	13.1-4
13.2	<u>TRAINING PROGRAMS</u>	13.2-1
13.2.1	Accredited Training Programs	13.2-1
13.2.2	General Employee and Fitness for Duty Training Programs	13.2-1
13.2.3	Other Training Programs	13.2-1
13.3	<u>EMERGENCY PLANNING</u>	13.3-1
13.4	<u>REVIEW AND AUDIT</u>	13.4-1
13.4.1	Onsite Review	13.4-1
13.4.2	Independent Review and Audit	13.4-1
	References	13.4-1
13.5	<u>SITE INSTRUCTIONS</u>	13.5-1
13.5.1	System of Site Instructions	13.5-1
13.5.1.1	Conformance With Regulatory Guide 1.33	13.5-1
13.5.1.2	Preparation of Procedures	13.5-1
13.5.2	Administrative Procedures	13.5-1
13.5.3	Operating Instructions and Procedures	13.5-2
13.5.3.1	System Operating Instructions	13.5-2
13.5.3.2	Abnormal Operating Instructions	13.5-2
13.5.3.3	Emergency Instructions	13.5-2
13.5.3.4	General Operating Instructions	13.5-2
13.5.3.5	Annunciator Response Instructions	13.5-2
13.5.3.6	Fuel Handling Instructions	13.5-3
13.5.4	Maintenance Instructions	13.5-3
13.5.4.1	Equipment Maintenance Instructions	13.5-3
13.5.4.2	Instrument Maintenance Instructions	13.5-3
13.5.4.3	Special Maintenance Instructions	13.5-3
13.5.5	Surveillance Instructions	13.5-4
13.5.6	Technical Instructions	13.5-4
13.5.7	Radiation Control Instructions	13.5-4
13.5.8	Special Test Instructions	13.5-4
13.5.9	Radiological Emergency Plan (REP) Implementing Procedures	13.5-4
13.5.10	Vendor or Contractor Instructions	13.5-4

## TABLE OF CONTENTS

<u>Section</u>	<u>Title</u>	<u>Page</u>
13.5.11	Radwaste Handling & Shipping	13.5-5
13.5-12	Modifications and additions Instructions	13.5-5
13.5-13	Plant Security Instructions/Standard Programs and Process	13.5-5
13.5-14	Periodic Instructions	13.5-5
13.5-15	Safety and Health Manual	13.5-5
13.5-16	Section Instructions, Manuals or Equivalent	13.5-5
13.5-17	Power Escalation Tests	13.5-6
13.5-18	Fire Protection Instructions	13.5-6
	References	13.5-6
13.6	<u>PLANT RECORDS</u>	13.6-1
13.6.1	Plant History	13.6-1
13.6.2	Operating Records	13.6-1
13.6.3	Event Records	13.6-2
	References	13.6-2
13.7	<u>NUCLEAR SECURITY</u>	13.7-1
13.7.1	Physical Security and Contingency Plan	13.7-1
13.7.2	Personnel and Program Evaluation	13.7-1
13.7.3	Physical Security of TPBARs	13.7-1
	References	13.7-2

## LIST OF TABLES

<u>Number</u>	<u>Title</u>
13.5-1	Operating Procedures

## LIST OF FIGURES

<u>Number</u>	<u>Title</u>
13.5-1	System of Written Procedures
13.5-2	Unit 1 Control Room Operating Areas

## 13.0 CONDUCT OF OPERATIONS

### 13.1 ORGANIZATIONAL STRUCTURE OF APPLICANT

#### 13.1.1 Corporate Organization

The information presented in Tennessee Valley Authority Topical Report TVANPOD89, Nuclear Power Group Organization Description Reference [1], is applicable to Watts Bar Nuclear Plant.

##### 13.1.1.1 Design Responsibilities

#### Unit 1

Westinghouse Electric Corporation has contracted to supply TVA with two nuclear steam supply systems. The Nuclear Engineering organization serves as the plant architect engineer for the balance of plant equipment and is responsible for ensuring that the technical requirements of the nuclear steam supply system contracts are met. The New Projects organization was responsible for constructing the plant in accordance with design specifications supplied by Nuclear Engineering.

Westinghouse assists in the plant startup program by providing technical guidance in support of the following operations:

1. The storage, protection, installation, cleaning, initial calibration, testing, and operation of the nuclear system equipment, instrumentation, and material supplied by Westinghouse.
2. The preoperational testing of the nuclear plant systems in which Westinghouse supplied equipment was installed. This included the right of review and comment on the preoperational testing of all plant systems that is related to the safety and performance of the nuclear system.
3. Operational checkouts and startup testing of the nuclear system, the initial fuel loading, and startup to the completion of the warranty demonstration test.
4. The onsite training of TVA personnel during the nuclear systems' preoperational testing, initial fuel loading, and startup activities.
5. Overall fuel management services as part of the initial long-term fuel contract.

#### Unit 2

For the completion of Watts Bar Unit 2, Westinghouse continued to be the Nuclear Steam Safety System Supplier. The Nuclear Engineering organization served as the Design Authority for the balance of plant equipment. The Nuclear Generation Development and Construction (NGDC) organization was responsible for ensuring that the technical requirements of the nuclear steam supply system contracts are met and that engineering was completed and the plant constructed in accordance with design specifications. The Bechtel Corporation will provide professional engineering, procurement, construction and related services (such as Quality Assurance, Quality Control, and maintenance and modifications work) needed for completion of Watts Bar Nuclear Plant Unit 2.

Westinghouse assists in the plant startup program by providing technical guidance in support of the following operations:

1. Review and comment on site provided refueling procedures and perform lower core plate inspection, initial core load, install upper internals, install reactor vessel head and complete reassembly activities up to and including missile shields.
2. Review and comment on the preoperational testing of all plant systems that are related to the safety and performance of the nuclear system.
3. Westinghouse will provide engineers for onsite engineering support starting approximately one month before initial core loading and continue through the 100% power, test sequence.

#### 13.1.2 Nuclear Power

##### 13.1.2.1 Offsite Organizations

The information presented in Tennessee Valley Authority Organization Topical Report, TVA-NPOD89-A,<sup>[1]</sup> TVA Nuclear Power Group Organization Description is applicable to Watts Bar Nuclear Plant.

Qualification requirements for positions providing corporate technical support, specifying required education and experience, are maintained in approved position descriptions on file at the site and central office by the Nuclear Human Resources organization. Numbers of positions are contained in approved staffing plans also maintained by the Nuclear Human Resources organization.

##### 13.1.2.2 Onsite Organization

The information presented in Tennessee Valley Authority Organization Topical Report, TVA-NPOD89-A,<sup>[1]</sup> TVA Nuclear Power Group Organization Description is applicable to Watts Bar Nuclear Plant.

#### 13.1.3 Qualification Requirements for Nuclear Facility Personnel

Nuclear Power (NP) personnel at the Watts Bar plant will meet the qualification and training requirements of NRC Regulatory Guide 1.8 with the alternatives as outlined in the Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, Reference [2].

# WBN

Below are various onsite and offsite positions correlated to ANSI N18.1-1971 and ANSI/ANS 3.1-1981 positions as appropriate.

<u>TVA Position Title</u>	<u>ANSI N18.1-1971 Position Title</u>
Plant Manager, Operations Manager	Plant Managers
Maintenance and Modifications Manager	Maintenance Manager
System Engineering Manager	Technical Manager
Operations Superintendent	Operations Manager
Chemistry Superintendent	Radiochemistry
Maintenance Superintendent	Maintenance Manager (Need not have non-destructive testing familiarity, craft knowledge or complete understanding of electrical, pressure vessel and piping codes.)
Assistant Unit Operator	Operators (Unlicensed)
Reactor Engineering Supervisor	Reactor Engineering and Physics
Electrical, I&C System Manager	Instrumentation and Control
<u>TVA Position Title</u>	<u>ANSI N18.1-1971 Position Title</u>
Maintenance and Modifications Manager	Technicians
	Repairmen
Offsite Supervisory Personnel	Staff Specialists
<u>TVA Position Title</u>	<u>ANSI/ANS 3.1-1981</u>
Radiological Control Superintendent	Radiation Protection
Shift Technical Advisor	Shift Technical Advisor
Shift Manager	Shift Supervisor
Unit Supervisor	Senior Operator
Unit Operator	Licensed Operators
Qualification of Plant Personnel	

The qualifications of key personnel are maintained on site and are available for NRC inspection.

<sup>1</sup> The position of Radiological Control Superintendent will meet the requirements of RG 1.8, Revision 2, and ANSI/ANS 3.1-1981, for all new personnel qualifying on positions identified in RG 1.8, Regulatory Position C.1, after January 1, 1990 as clarified by Reference 3.

#### REFERENCES

1. Tennessee Valley Authority Organization Topical Report TVA-NPOD89-A, TVA Nuclear Power Group Organization Description.
2. Nuclear Quality Assurance Program, TVA-NQA-PLN89-A, Appendix B.
3. TVA Standard Program and Processes, NPG-SPP-05.1, "Radiological Controls."

## 13.2 TRAINING PROGRAMS

### 13.2.1 Accredited Training Programs

The Watts Bar Nuclear Plant (WBN) training programs have been developed in accordance with the Systems Approach to Training as prescribed by the Institute of Nuclear Power Operations (INPO). The National Academy for Nuclear Training, through a formal accreditation process, verifies that WBN training programs meet the established criteria. WBN is a branch of the National Academy and has achieved accreditation of the following programs:

- Non-licensed operator
- Reactor operator
- Senior reactor operator
- Continuing training for licensed personnel
- Shift manager
- Shift technical advisor
- Instrument and control technician
- Electrical maintenance personnel
- Mechanical maintenance personnel
- Radiological Control technician
- Chemistry technician
- Engineering support personnel
- Maintenance Supervisor

The training programs are periodically reviewed by management for effectiveness. Revisions are made as appropriate. Records are retained as necessary to support management information needs and to provide historical data.

### 13.2.2 General Employee and Fitness for Duty Training Programs

All persons regularly employed at WBN are trained in the following areas commensurate with their job duties:

- Fitness for duty
- Plant Organization and Administration
- General plant description
- Job related procedures and instructions
- Radiological protection
- Emergency preparedness
- Industrial safety
- Fire protection
- Security
- Quality Assurance and Quality Control (Including Procedure Overview)

### 13.2.3 Other Training Programs

Responsible managers ensure that personnel performing quality-related activities receive indoctrination and training to ensure that adequate proficiency is achieved and maintained.

### 13.3 EMERGENCY PLANNING

The TVA Radiological Emergency Plan (REP) has been developed to provide protective measures for TVA personnel, and to protect the health and safety of the public in the event of a radiological emergency resulting from an accident at Watts Bar Nuclear Plant. The REP contains site-specific appendices for each plant. Watts Bar's radiological emergency information is in Appendix C. The REP fulfills the requirements set forth in part 50, Title 10 of the Code of Federal Regulations that an emergency plan be included in the Final Safety Analysis Report and was developed in accordance with the Nuclear Regulatory Commission and Federal Emergency Management Agency Guidance.

The Emergency Plan Implementing Procedures (EPIPs) which implement the REP provide more detailed descriptions of Watts Bar's site emergency organization, emergency response facilities, capabilities, equipment, protective actions, and responsibilities.

The "State of Tennessee Multijurisdictional Radiological Emergency Response Plan for Watts Bar Nuclear Power Plant" is referenced in Appendix E of the REP. The "Georgia Radiological Emergency Response Plan" and "North Carolina Plan for Sequoyah/Watts Bar" are also referenced in Appendix E.



## 13.4 REVIEW AND AUDIT

### 13.4.1 Onsite Review

The plant staff organization provides continuing review of operational activities to ensure they are conducted in a safe manner. The Plant Operations Review Committee (PORC) is a multi-disciplined committee responsible for providing an oversight review of programs, documents, and activities required for the safe operation of the plant. The PORC advises the Plant Manager on matters related to nuclear safety. Also, technical reviewers provide for reviews of procedure changes and proposed changes to structures, systems, and components that affect nuclear safety in their area of expertise. These technical reviews determine the need for a cross-disciplinary review and whether NRC's approval prior to implementation is required.

Technical reviewers and PORC shall be qualified, organized, and conduct business as described in Reference [1].

### 13.4.2 Independent Review and Audit

Independent review and evaluation is performed by the Nuclear Safety Review Board (NSRB). The NSRB is described in Reference [1].

The Nuclear Assurance (NA) organization conducts the audit and assessment program as described in Reference [1].

The Engineering organization performs independent technical reviews as described in Reference [1].

## REFERENCES

1. Nuclear Quality Assurance Plan, TVA-NQA-PLN89A.

## 13.5 SITE INSTRUCTIONS

### 13.5.1 SYSTEM OF SITE INSTRUCTIONS

#### 13.5.1.1 Conformance with Regulatory Guide 1.33

The Site Vice President and Plant Manager issues, in the form of administrative instructions, instructions governing employee actions and established standards for plant operation. Additionally, standard TVA Nuclear (TVAN) administrative procedures are issued by the Vice President, Nuclear Support, which are applicable to all TVA nuclear plants. These procedures are written using the guidelines of Regulatory Guide 1.33, Revision 2, February 1978, with alternatives as shown in the Nuclear Quality Assurance Plan. Figure 13.5-1 shows the organizational structure of these various instructions. Plant operations and other work activities are performed in accordance with these written and approved procedures.

#### 13.5.1.2 Preparation of Procedures

Instructions and procedures covering plant operations, maintenance work, tests, equipment changes, and other activities which might affect nuclear safety are put into effect only after being reviewed by an independent qualified reviewer(s), the Plant Operations Review Committee (PORC) when required, and approved by a responsible manager who is designated by the Plant Manager. It is the appropriate responsible manager's responsibility to ensure that required reviews and approvals are completed before authorizing the use of any site procedure.

One-time-only instructions may be generated as described in administrative site procedures for special conditions or when normal instructions are not adequate to accomplish the desired task.

Site procedures may be temporarily changed without delay when the need arises by following the administrative procedure system.

The PORC is responsible for reviewing prepared tests or experiments that affect nuclear safety and proposed instructions and changes to plant procedures within the scope of 10 CFR 50.59 to determine whether a license amendment is required.

### 13.5.2 Administrative Procedures

Instructions, standards, programs, and processes are prepared to govern employee actions and site and plant operation. These instructions contain administrative restrictions and station requirements established to ensure safe operation of the plant within the limits set by the facility license and technical specifications. They provide that plant activities will be conducted in a manner to protect the general public, plant personnel, and equipment.

### 13.5.3 Operating Instructions and Procedures

Operating instructions are prepared for integrated plant operations such as plant startup power operation, etc., where such instructions are required to ensure safety and reliability ANSI N18.7 and Regulatory Guide 1.33, Rev.2 are used as guidelines in the preparation of operating instructions. Table 13.5-1 lists typical operating procedures.

#### 13.5.3.1 System Operating Instructions

Operating Instructions are prepared for system operations and equipment operations to ensure safety and reliability. Some instructions must be followed step-by-step and documented. These requirements are identified within the instruction.

The instructions contain mode of operation of the system such as startup, shutdown, energizing, filing and venting, and standby operation as applicable, conditions for operation and precautions to be observed.

#### 13.5.3.2 Abnormal Operating Instructions

Abnormal operating instructions exist for abnormal operation of the unit. Operation of system or equipment in this mode could degrade into an emergency condition. In addition, symptoms of the abnormality, automatic actions that may occur, and operator actions are given.

#### 13.5.3.3 Emergency Instructions

Emergency Instructions are prepared for conditions which may possibly lead to injury of plant personnel or to the public or conditions which may possibly lead to the release of radioactivity in excess of established operating limits. These procedures provide a discussion of the postulated event, symptoms of the postulated emergency, automatic actions, and immediate and subsequent operator actions.

#### 13.5.3.4 General Operating Instructions

General operating instructions are developed to ensure safe unit startup, shutdown, and load changes and are required to ensure safety and reliability for complex activities that affect many different systems.

#### 13.5.3.5 Annunciator Response Instructions

Annunciator response instructions are written to guide operator response to conditions that result in annunciation of plant conditions.

#### 13.5.3.6 Fuel Handling Instructions

Fuel handling instructions are used to ensure a safe and orderly refueling operations. The instructions specify or make reference to other system operation documents that specify periodic shutdown margin checks, fuel handling techniques, and other precautionary steps to assure that the facility license and Technical Specifications are not violated. Licensed operators will supervise the operations when fuel is received, initially inventoried, stored, removed, or rearranged in the core or when control rods are being installed, removed, or manipulated. Technical personnel will provide guidance when necessary and will verify that all fuel has the proper orientation and is in the correct location.

#### 13.5.4 Maintenance Instructions

##### 13.5.4.1 Equipment Maintenance Instructions

Written maintenance instructions are prepared for critical equipment and for special jobs on safety related systems and 10 CFR 50.49 equipment as the need arises, or systems and equipment expected to require frequent or systematic maintenance. These instructions covering mechanical and electrical maintenance provide information to assure proper coordination of operating and maintenance employees as well as step-by-step actions with allowance for "skill of the craft" to be followed by the craftsmen doing the work. As operating and maintenance experience is acquired, maintenance instructions are revised and/or new instructions are written to improve the quality of the maintenance program.

##### 13.5.4.2 Instrument Maintenance Instructions

Instrument maintenance instructions are written for performing periodic calibration and testing of safety-related plant instrumentation. These instructions ensure measurement accuracies adequate to maintain plant safety parameters within operational and safety limits according to technical specification requirements.

##### 13.5.4.3 Special Maintenance Instructions

Special maintenance instructions are developed for special maintenance activities. These instructions are not routinely performed; however, results from these performances may generate routinely performed instructions covered by one of the other types of instructions addressed in Section 13.5.1.

#### 13.5.5 Surveillance Instructions

Instructions are prepared covering the conduct of periodic surveillance tests and inspections designated in the plant Technical Specifications, the Technical Requirements Manual, Offsite Dose Calculation Manual (ODCM), and the plant Fire Protection Report.. These instructions as a minimum specify requirements, precautions, acceptance criteria, necessary step-by-step actions for conduct of the tests and return to normal, data sheets, and documentation by those conducting and reviewing the tests or inspections. Detailed test schedules and records are maintained to assure that scheduled surveillance requirements are conducted in a timely manner and the results are properly documented.

#### 13.5.6 Technical Instructions

Instructions are prepared covering routine technical evolutions for tests, inspections, examinations, and special processes as required. Examples of these evolutions are chemistry instructions, and calibration of vital instrumentation.

#### 13.5.7 Radiation Control Instructions

Radiation control instructions are maintained and made available to all site personnel. These instructions are written to implement the requirements of 10 CFR 20, applicable codes and standards, and commitments to outside agencies (American Nuclear Insurers, Institute of Nuclear Plant Operations, etc.)

#### 13.5.8 Special Test Instructions

Instructions are prepared for special test and experiments. These instructions are normally one time performance; however, results from these tests may generate routinely performed instructions covered by one of the other types of instructions addressed in Section 13.5.1.

#### 13.5.9 Radiological Emergency Plan (REP) Implementing Procedures

Procedures are prepared covering the site implementation of the REP.

#### 13.5.10 Vendor or Contractor Instructions

Instructions are prepared to convert vendor or contractor instructions into plant instructions, as applicable. These instructions will meet TVA quality assurance program and site administrative requirements.

13.5.11      Radwaste Handling & Shipping

Instructions are prepared covering packing and shipping of radioactive waste and materials or equipment, and the process control program for the radwaste system.

13.5.12      Modifications and Additions Instructions

Instructions are prepared covering modifications and additions to plant systems and equipment. Processes covered by these instructions include welding, pulling, splicing, and installation of cables, conduit and junction boxes, bolted connections, supports, grouting, conax connectors, coatings, and concrete.

13.5.13      Plant Security Instructions/Standard Programs and Process

Instructions are prepared covering plant access, badging, vehicles, searches, physical security of vital areas of plant, security events, security degradation, and reporting and security inspections.

13.5.14      Periodic Instructions

Instructions are prepared covering periodic test and inspections which are not designated in the plant technical specifications, and are scheduled by utilizing the SI matrix for periodic performances. These include but are not limited to tests designed by applicable UFSAR sections, the NPDES permit, and augmented QA/test program.

13.5.15      Safety and Health Manual

Instructions are prepared covering safety measures to be taken by personnel when handling certain types of portable mechanical or electrical equipment and protective measures while inspecting electrical equipment.

13.5.16      Section Instructions, Manuals, or Equivalent

Each section supervisor may prepare, as the need arises, instructions pertaining to administrative routines, responsibilities, and methods to be followed by members of his/her section in areas of activity that does not involve nuclear safety and/or the implementation of the technical specification.

13.5.17      Power Escalation Tests

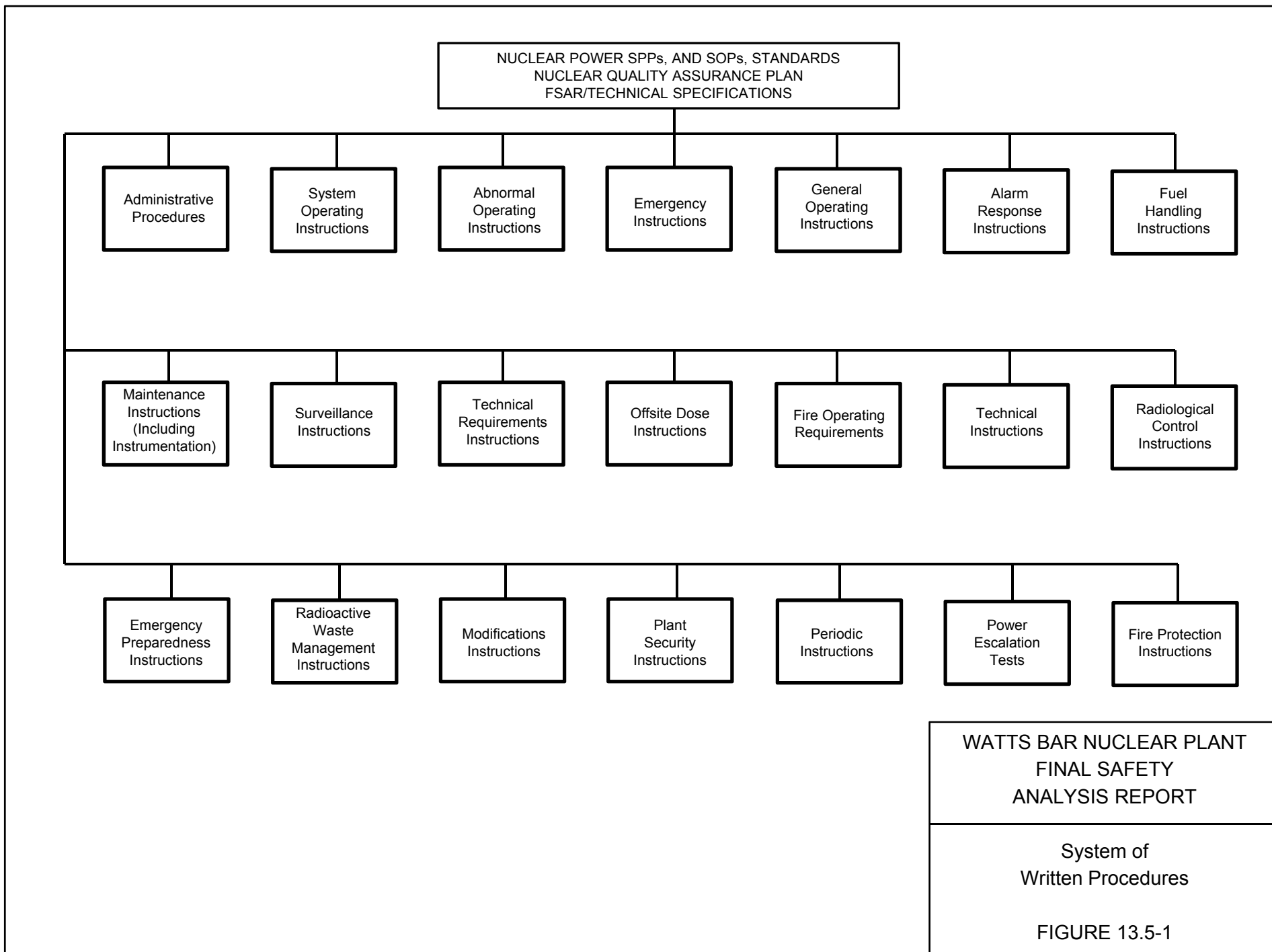
Written procedures cover the conduct of tests performed during physics testing and power ascension testing following core alterations. Instructions also cover core reloading, initial criticality, incore power distribution measurements and power ascension.

13.5.18      Fire Protection Instructions

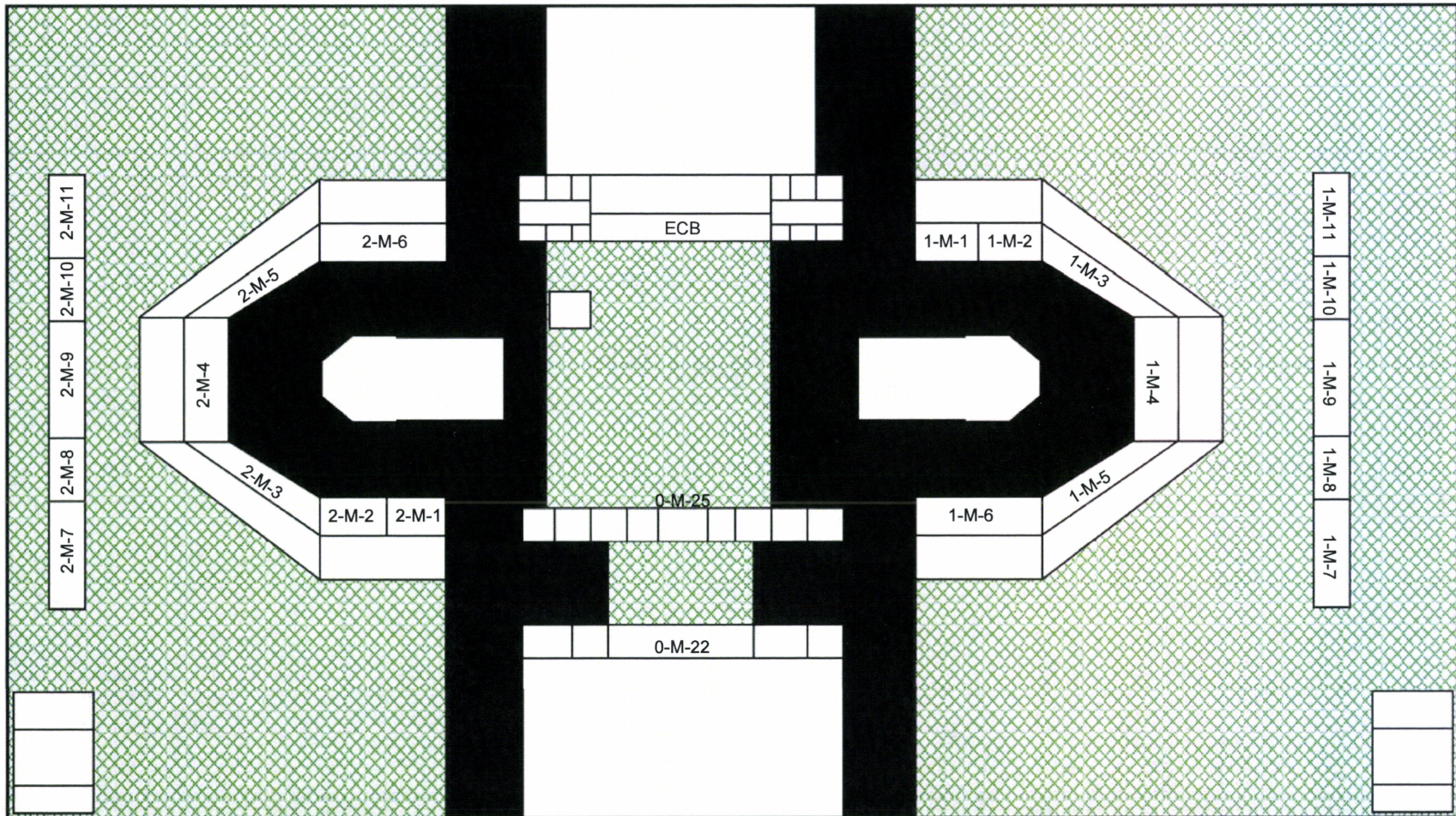
Instructions are prepared covering the implementation of the administrative fire protection program as required by the Fire Protection Report and Insurance Carrier requirements. These instructions are to minimize the potential for loss and to minimize actual events.

REFERENCES

None.







- Area 1  Normal surveillance area for the "RO" (includes Operator workstation)
- Area 2  Areas entered occasionally to verify alarms and/or initiate corrective actions and entered in the event of an emergency affecting the safety or major equipment or personnel.

WATTS BAR NUCLEAR PLANT  
FINAL SAFETY  
ANALYSIS REPORT

Unit 1 & 2 Control Room  
Operating Areas

FIGURE 13.5-2

## 13.6 PLANT RECORDS

### 13.6.1 Plant History

TVA's records program observes all acts of Congress, executive orders and regulations of Federal agencies having jurisdiction in records administration (for the particular case of nuclear plants, this includes 10 CFR 50, Appendix B, Criterion XVII). TVA complies with Department of Energy regulations concerning the preservation and disposal of records of public utilities and licensees, insofar as those regulations apply to TVA records relating to the generating, transmission, and sale of electric energy.

The site Management Services (MS) Manager has responsibility for 1) developing, implementing, and maintaining an integrated site program to ensure that documents are properly processed, up-to-date, and readily available for use, and 2) managing a program for storing, updating, and retrieving plant documents.

### 13.6.2 Operating Records

Records reflecting plant or equipment performance and records of tests and inspections which support compliance with the plant licenses, including records of radioactivity release to the environs are routed to the site MS for retention. These records are originated by all plant sections.

The operators maintain journals containing details pertaining to the operation of the plant. Operators also maintain operating data sheets which ensure their frequent observations of equipment condition and operating values. These records are examined by the plant operations management and are support documents for performance analysis. The unit logs or an acceptable electronic copy are retained in the site MS.

The station computer printouts and the operators data sheets serve as the normal source of operating data and statistics. To ensure continuity of information, provision is made for supplementary data to be maintained if the computer becomes inoperative. In addition, this information is supported by installed recording and data logging instrumentation. These records are sent to the Site MS on a regular basis for retention.

The Maintenance section initiates equipment history and inventory files. These records are maintained and updated by Site MS. These records contain complete information on repairs, modifications, tests, derangements and other data as considered necessary to provide a comprehensive material history of the item considered.

Specific records and their retention periods are controlled in the Reference [1].

13.6.3        Event Records

Records of individual radiation exposure and plant and environs radiation levels are retained by Radiation Control Section.

Records of results of surveillance and maintenance requirements are retained by Site MS. Records of radioactive effluent discharges and quantities of radioactive wastes shipped for offsite disposal are retained by Site MS.

REFERENCES

1.        Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A.

## 13.7 NUCLEAR SECURITY

### 13.7.1 Physical Security and Contingency Plan

TVA's plan for protection of Watts Bar Nuclear Plant is contained in separate controlled documents. These documents require submission as separate submittals to ensure compliance with 10 CFR 73.21<sup>[1]</sup> and paragraph 2.390(d) of 10 CFR part 2.<sup>[2]</sup> These separate submittals provide a comprehensive description of the physical security program for the plant site which include physical barriers and means of detecting unauthorized intrusions; provisions for monitoring access to vital equipment and access control; provisions for selection and training of personnel for security purposes; communication systems for security; provisions for maintenance and testing of security systems; arrangements for law enforcement assistance; provisions for responding to security threats; and required organizational charts and drawings that depict the site layout. These documents may be withheld from public disclosure pursuant to paragraph 2.390(d) of 10 CFR part 2.<sup>[2]</sup> These documents are identified as:

- A. The Physical Security Plan/Contingency Plan as specified by 10 CFR Parts 50.34(c),<sup>[3]</sup> 50.34(d),<sup>[4]</sup> and 73.55(b).<sup>[5]</sup>
- B. The Security Personnel Training and Qualification Plan as specified by 10 CFR 73.55(d).<sup>[6]</sup>

### 13.7.2 Personnel and Program Evaluation

TVA's Nuclear Power organization is responsible for protection of power properties with functional responsibility delegated as shown in the Nuclear Power Organization Description.<sup>[7]</sup>

The Watts Bar Security Program is evaluated by individual(s) who are knowledgeable of security requirements and independent of both security management and supervision. The review is conducted to determine the effectiveness of security procedures and personnel practices as they relate to the implementation of licensed security documents. Based on the review, a detailed report is submitted to appropriate management recommending corrective action and improvements, if any, to ensure the successful implementation of the security program<sup>[8]</sup>.

### 13.7.3 Physical Security of TPBARs

Physical Security for tritium production is identified within a Department of Energy (DOE) approved security plan for WBN that is a separate plan from the NRC Physical Security Plan required by 10 CFR 50. DOE will continue to be the cognizant security agency for physical security concerning protection of the tritium producing burnable absorber rod (TPBARs). NRC's security oversight and responsibilities will remain the same.

REFERENCES

1. 10 CFR 73.21(b), Protection of Safeguards Information: Performance Requirements.
2. 10 CFR 2.390(d), Public Inspections, Exemptions, Requests for Withholding.
3. 10 CFR 50.34(c), Contents of Applications: Technical Information; Physical Security Plan.
4. 10 CFR 50.34(d), Contents of Applications: Technical Information; Safeguards Contingency Plan.
5. 10 CFR 73.55(b), Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors against Radiological Sabotage; General Performance Objective and Requirements.
6. 10 CFR 73.55(d), Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors against Radiological Sabotage; Security Organization.
7. Nuclear Power Organization Description, Topical Report, TVA-NPOD89.
8. 10 CFR 73.55(gm) Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors against Radiological Sabotage; Security Program Reviews.