



Carolina Power & Light Company

August 14, 1979

PDR

FILE: NG-3514(B)

SERIAL: GD-79-2050

Office of Nuclear Reactor Regulation
ATTENTION: Mr. T. A. Ippolito, Chief
Operating Reactors Branch No. 3
United States Nuclear Regulatory Commission
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENT - CORPORATE ORGANIZATIONAL CHANGES

Dear Mr. Ippolito:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90 and Part 2.101, Carolina Power & Light Company (CP&L) hereby requests revisions to the Technical Specifications for its Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2. These revisions reflect corporate organizational changes all of which are administrative in nature; some of the changes were effective on June 1, 1979, and others will become effective on September 1, 1979.

These most recent changes have superseded our August 14, 1978 corporate reorganization submittal. Therefore, we have prepared the attached package to include all applicable changes. Please review the attached revised package in lieu of our August 14, 1978 submittal. No additional fee should be required since this submittal supersedes the August 14, 1978 submittal which has not yet been acted on by the Staff.

Enclosed are the revised pages for the Brunswick Units 1 and 2 technical specifications which reflect these revisions. Changes are indicated by vertical lines in the right-hand margins of the affected pages. Some pages will only be effective through August 31, 1979 and are denoted by (Prime) printed after the page number. Some pages are not to become effective until September 1, 1979 and are so noted. The remaining pages show neither of these notations and should become effective as soon as possible.

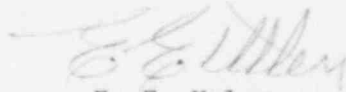
As before, Mr. J. A. Jones remains as the Chief Operating Officer for CP&L and is the addressee for official correspondence from the NRC. His title, however, is now Senior Executive Vice President. I am now Executive Vice President - Power Supply & Customer Services. My former position, Senior Vice President - Power Supply, is now held by Mr. D. V. Menscer.

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Effective September 1, 1979, there will be a new Department of Nuclear Safety and Research, headed by Dr. T. S. Elleman. This new department will include the functions of Research, Health Physics, and Corporate Nuclear Safety and Quality Assurance Audit.

If you have any questions on these matters, please contact our staff.

Yours very truly,

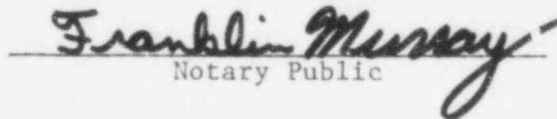


E. E. Utley
Executive Vice President
Power Supply & Customer Services

DVM:pfb

Attachments

Sworn to and subscribed before me this 14th day of August, 1979.


Notary Public

My Commission Expires: October 4, 1981



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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2.1-1 (Prime).

FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figures 6.2.2-1 and 6.2.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1.
- b. At least one licensed Operator shall be in the control room for each reactor containing fuel.
- c. At least two licensed Operators shall be present in the control room for each reactor in the process of start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in either reactor.
- e. All CORE ALTERATIONS shall be 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.
- f. A Fire Brigade of at least five members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew shown in Table 6.2.2-1 or any personnel required for other essential functions during a fire emergency.

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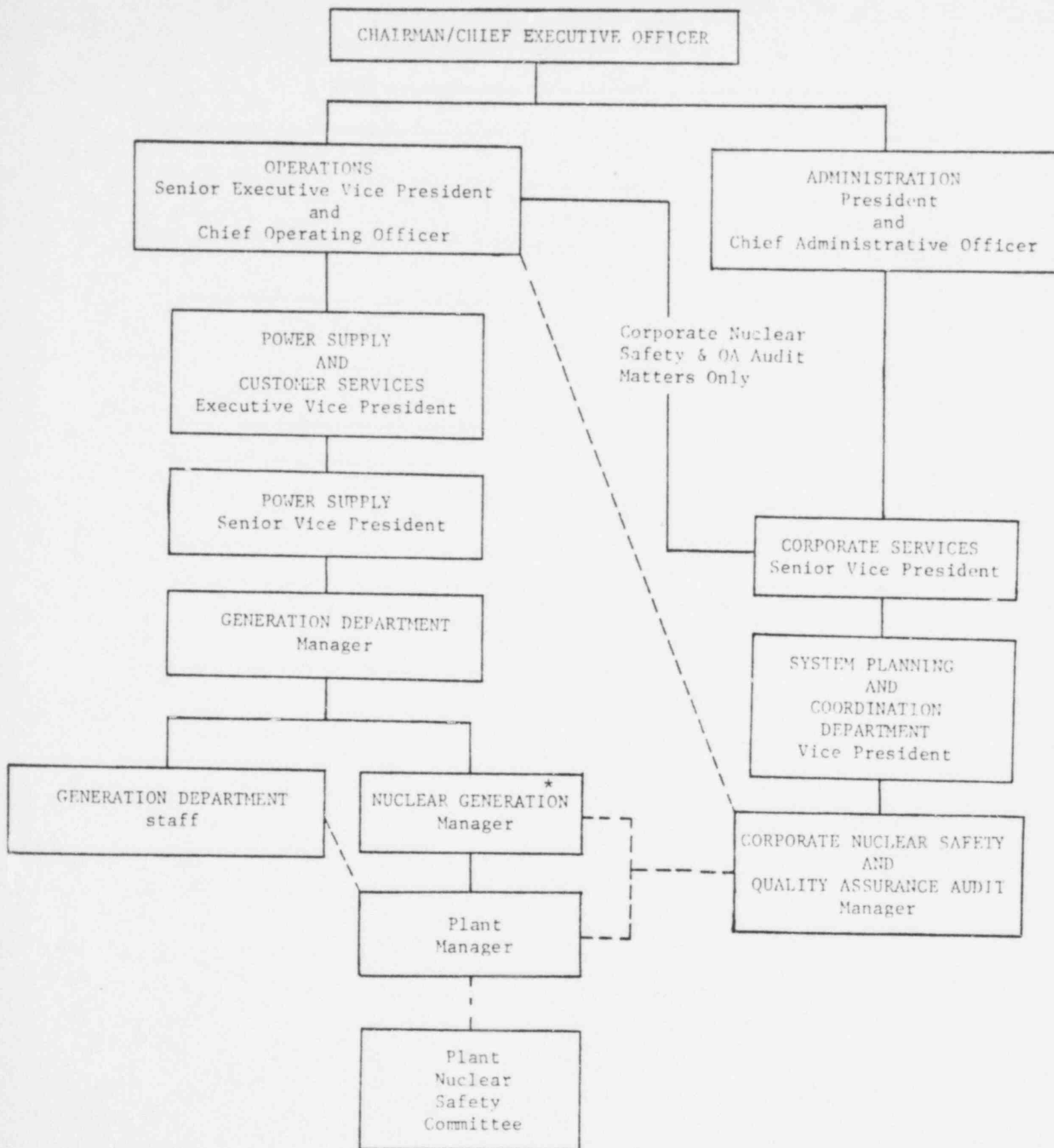
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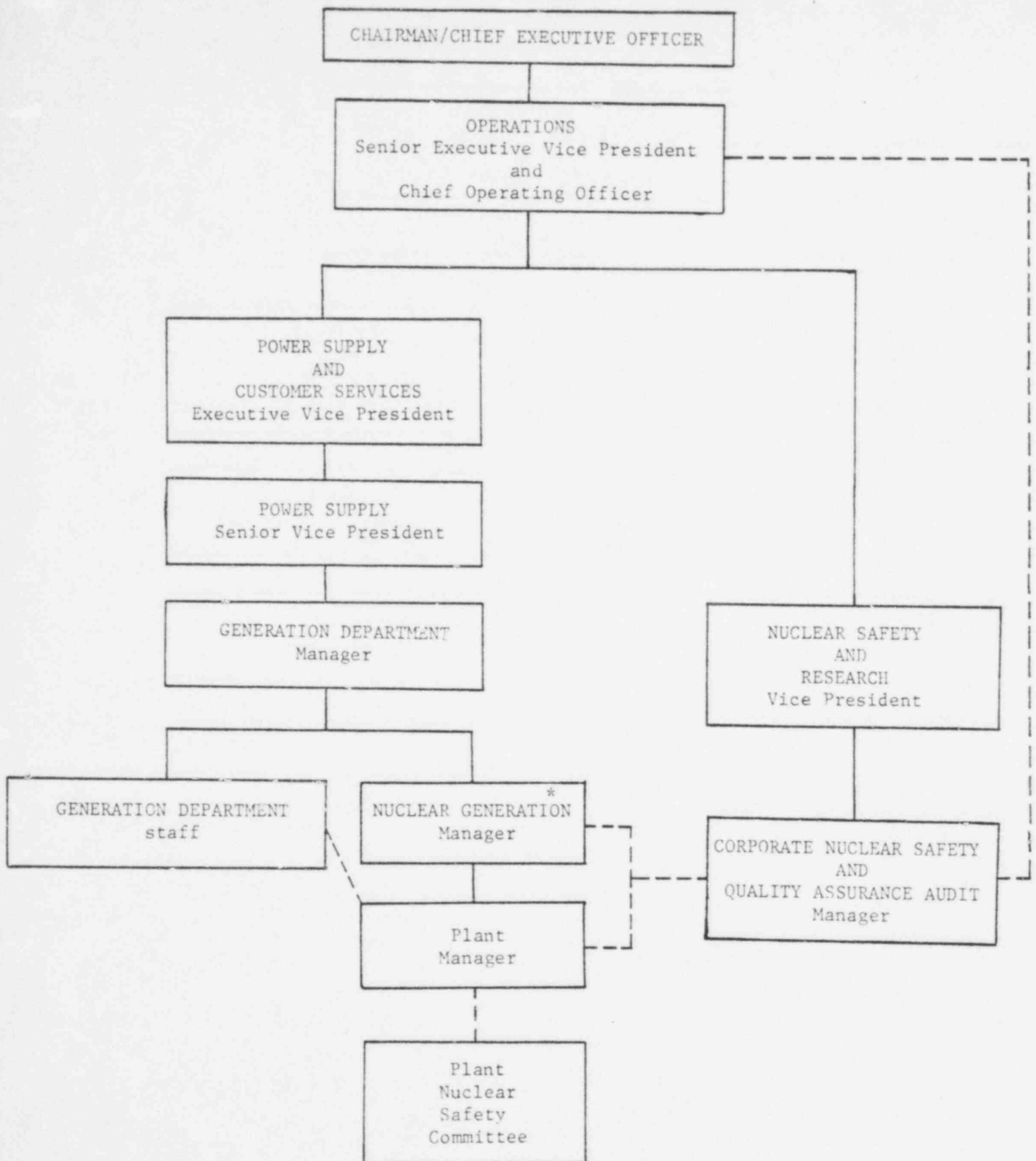
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*Responsible for performance and monitoring of Fire Protection Program.

MANAGEMENT ORGANIZATION CHART
FIGURE 6.2.1-1(Prime)

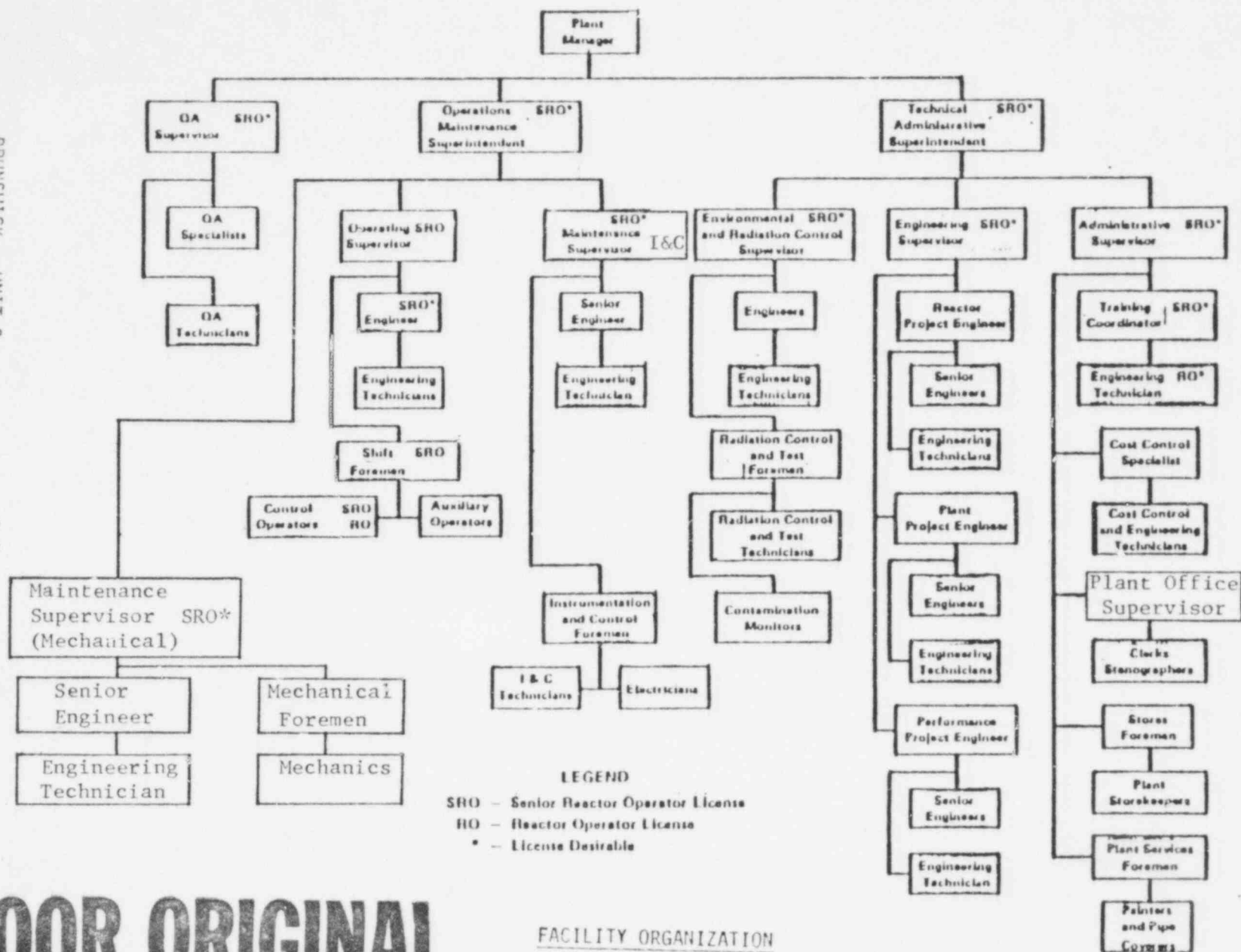
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*Responsible for performance and monitoring of Fire Protection Program.

MANAGEMENT ORGANIZATION CHART
FIGURE 6.2.1-1

POOR ORIGINAL



FACILITY ORGANIZATION

Figure 6.2.2-1

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for the Radiation Protection Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Coordinator and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Plant Fire Chief and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975.

6.5 REVIEW AND AUDIT

6.5.1 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)

FUNCTION

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

COMPOSITION

6.5.1.2 The PNSC shall be composed of the:

Chairman:	Plant Manager
Vice Chairman:	Operations-Maintenance or Technical- Administrative Superintendent
Secretary:	Administrative Supervisor
Member:	Maintenance Supervisor (I&C)
Member:	Engineering Supervisor
Member:	Environmental and Radiation Control Supervisor
Member:	Quality Assurance Supervisor
Member:	Operating Supervisor
Member:	Maintenance Supervisor (Mechanical)

ALTERNATES

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

ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the PNSC shall consist of the Chairman or Vice Chairman and three members including alternates.

RESPONSIBILITIES

6.5.1.6 The PNSC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- 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 Manager of Nuclear Generation and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit.
- f. Review of all events requiring 24 hour notification to the Commission.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations and reports thereon as requested by the Manager - Corporate Nuclear Safety and Quality Assurance Audit.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- i. Review of the Plant Security Plan and implementing procedures.
- j. Review of the Emergency Plan and implementing procedures.

AUTHORITY

6.5.1.7 The PNSC shall:

- a. Recommend to the Plant Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- 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 Manager of Nuclear Generation and the Manager - Corporate Nuclear Safety and Quality Assurance Audit of disagreement between the PNSC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The PNSC shall maintain written minutes of each meeting and copies shall be provided to the Manager of Nuclear Generation and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit.

ADMINISTRATIVE CONTROLS

6.5.2 Corporate Nuclear Safety & Quality Assurance Audit Section (CNS & QAAS)

Responsibility

6.5.2.1 The Manager - Corporate Nuclear Safety & Quality Assurance Audit under the Vice President-System Planning & Coordination is charged with the overall responsibility for administering the independent off-site review and quality assurance audit programs as follows:

- a. Approves selection of the individual(s) to conduct off-site safety reviews and quality assurance audits.
- b. Has access to the plant operating records and operating personnel in performing the independent reviews and quality assurance audits.
- c. Prepares and retains written records of reviews and audits.
- d. Assures independent safety reviews are conducted on all items required by Section 6.5.3.3 and quality assurance audits cover all the items included in Section 6.5.4.1.
- e. Distributes reports and other records to appropriate managers.

6.5.3 Corporate Nuclear Safety Unit

Function

6.5.2 Corporate Nuclear Safety & Quality Assurance Audit Section
(CNS & QAAS)

Responsibility

6.5.2.1 The Manager - Corporate Nuclear Safety & Quality Assurance Audit under the Vice President-Nuclear Safety and Research is charged with the overall responsibility for administering the independent off-site review and quality assurance audit programs as follows:

- a. Approves selection of the individual(s) to conduct off-site safety reviews and quality assurance audits.
- b. Has access to the plant operating records and operating personnel in performing the independent reviews and quality assurance audits.
- c. Prepares and retains written records of reviews and audits.
- d. Assures independent safety reviews are conducted on all items required by Section 6.5.3.3 and quality assurance audits cover all the items included in Section 6.5.4.1.
- e. Distributes reports and other records to appropriate managers.

6.5.3 Corporate Nuclear Safety Unit

Function

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6.5.3.1 The Corporate Nuclear Safety Unit of the Corporate Nuclear Safety & Quality Assurance Audit Section shall provide independent off-site review of significant plant changes, tests, and procedures; verify that reportable occurrences are promptly investigated and corrected in a manner which reduces the probability of recurrence of such events; and detect trends which may not be apparent to a day-to-day observer.

Personnel

6.5.3.2

a. Personnel assigned responsibility for independent reviews shall be specified in technical disciplines, and shall collectively have the experience and competence required to review problems in the following areas:

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
9. Seismic and environmental
10. Quality assurance practices

b. The following minimum experience requirements shall be established for those persons involved in the independent off-site safety review program:

1. Manager of CNS & QAAS - Bachelor of Science in engineering or related field and ten (10) years related experience including five (5) years involvement with operation and/or design of nuclear power plants.
 2. Reviewers - Bachelor of Science in engineering or related field or equivalent and five (5) years related experience including three (3) years involvement with operation and/or design of nuclear power plants.
- c. An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Corporate Nuclear Safety Unit, competent individuals from other CP&L organizations or outside consultants shall be utilized in performing independent off-site reviews and investigations.
- d. At least three persons, qualified as discussed in Specification 6.5.3.2.b, will review each item submitted under the requirements of 6.5.3.3.
- e. Independent safety reviews shall be performed by personnel not directly involved with the activity or responsible for the activity.

Subjects Requiring Independent Review

6.5.3.3 The following subjects shall be reviewed by the Corporate Nuclear Safety Unit:

- a. Written safety evaluations of changes in the facility 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).
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the technical specifications or an unreviewed safety question pursuant to 10 CFR 50.59(c). Matters of this kind shall be referred to the Corporate Nuclear Safety Unit by the Plant Nuclear Safety Committee following its review, or by other functional organizational units within Carolina Power & Light Company (CP&L) 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, deviations and reportable events, which require reporting to the NRC within 24 hours, and as defined in the plant technical specifications such as:
 1. Violations of applicable codes, regulations, orders, technical specifications, license requirements or internal procedures or instructions having safety significance;
and

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2. Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components.

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

- e. Any other matter involving safe operation of the nuclear power plant which the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section deems appropriate for consideration, or which is referred to the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section by the onsite operating organization or by other functional organizational units within Carolina Power & Light Company.

Follow-up Action

6.5.3.4 Results of Corporate Nuclear Safety (CNS) reviews, including recommendations and concerns will be documented.

- a. Copies of the documented review will be retained in the Corporate Nuclear Safety & Quality Assurance Audit Section files.
- b. Recommendations and concerns will be submitted to the Manager - Nuclear Generation within 14 days of determination.
- c. A summation of Corporate Nuclear Safety recommendations and concerns will be submitted to the Chairman/Chief Executive

Officer; Chief Operating Officer; Executive Vice President-Power Supply and Customer Services; Senior Vice President-Power Supply; Vice President-System Planning & Coordination; Plant Manager; and others, as appropriate on at least a bi-monthly frequency.

6.5.3.5 The Corporate Nuclear Safety Unit review program shall be conducted in accordance with written, approved procedures.

6.5.4 Operation & Maintenance Unit

Function

6.5.4.1 The Operation & Maintenance Unit of the Corporate Nuclear Safety & Quality Assurance Audit Section shall perform audits of plant activities. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per six months.
- d. The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.

Officer; Chief Operating Officer; Executive Vice President-Power Supply and Customer Services; Senior Vice President-Power Supply; Vice President-Nuclear Safety and Research; Plant Manager; and others, as appropriate on at least a bi-monthly frequency.

6.5.3.5 The Corporate Nuclear Safety Unit review program shall be conducted in accordance with written, approved procedures.

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Function

6.5.4.1 The Operation & Maintenance Unit of the Corporate Nuclear Safety & Quality Assurance Audit Section shall perform audits of plant activities. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per six months.
- d. The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.

- e. The Emergency Plan and implementing procedures at least once per two years.
- f. The Security Plan and implementing procedures at least once per two years.
- g. The Facility Fire Protection Program and implementing procedures at least once per two years.
- h. Any other area of facility operation considered appropriate by the Corporate Quality Assurance Audit Operation & Maintenance Unit, the Executive Vice President-Power Supply and Customer Services, or the Senior Vice President-Power Supply.

Personnel

6.5.4.2

- a. Audit personnel will be independent of the area audited. Selection for auditing assignments is based on experience or training which establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting auditing personnel, consideration will be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.
- b. Qualified outside consultants or other individuals independent from those personnel directly involved in plant operation, but within the Operations Groups will be used to augment the audit teams when necessary.

ADMINISTRATIVE CONTROLS

Reports

6.5.4.3 Results of audit are approved by the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section and transmitted directly to the Company Chairman/Chief Executive Officer, the Chief Operating Officer, the Executive Vice President-Power Supply and Customer Services, the Senior Vice President-Power Supply, and the Vice President-System Planning & Coordination, and others as appropriate, within 30 days after the completion of the audit.

6.5.4.4 The corporate quality assurance audit program shall be conducted in accordance with written, approved procedures.

6.5.5 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM

6.5.5.1 An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing an outside fire protection firm.

6.5.5.2 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.

ADMINISTRATIVE CONTROLS

Reports

6.5.4.3 Results of audit are approved by the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section and transmitted directly to the Company Chairman/Chief Executive Officer, the Chief Operating Officer, the Executive Vice President-Power Supply and Customer Services, the Senior Vice President-Power Supply, and the Vice President-Nuclear Safety and Research, and others as appropriate, within 30 days after the completion of the audit.

6.5.4.4 The corporate quality assurance audit program shall be conducted in accordance with written, approved procedures.

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6.5.5.1 An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing an outside fire protection firm.

6.5.5.2 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.

ADMINISTRATIVE CONTROLS

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the PNSC and submitted to Manager - Corporate Nuclear Safety and Quality Assurance Audit and the Manager of Nuclear Generation.

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 SHUTDOWN within two hours.
- b. The Safety Limit violation shall be reported to the Commission, the Manager Nuclear Generation and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSC. 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 Manager - Corporate Nuclear Safety and Quality Assurance Audit and the Manager of Nuclear Generation within 14 days of the violation.

6.8 PROCEDURES

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, November, 1972.
- 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.

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

- h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components identified in Table 5.7.1-1.
- g. Records of reactor tests and experiments.
- h. Records of training and qualification for current members of the plant staff.
- i. Records of in-service inspections performed pursuant to these Technical Specifications.
- j. Records of Quality Assurance activities required by the QA Manual.
- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- l. Records of meetings of the PNSC and of the previous off-site review organization, Company Nuclear Safety Committee (CNSC).

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Objective

This section describes the administrative controls and procedures necessary to implement the Environmental Technical Specifications.

5.1 ORGANIZATION AND REVIEW

The Plant Manager is directly responsible for the safe operation of the facility as shown in Figure 5.1-1(Prime). In all matters pertaining to the operation of the plant and to the Environmental Technical Specifications, the Plant Manager is directly responsible to the Manager of Nuclear Generation. The Environmental and Radiation Control Supervisor is directly responsible to the Plant Manager for all Environmental Technical Specifications applicable to the plant, radiological and otherwise.

In the Generation Department, the Manager - Generation Services, Harris Energy & Environmental Center Section, and his staff function in a staff capacity to assist in the proper implementation of the Environmental Technical Specifications.

Review of plant operations and the technical specifications shall be accomplished by the Plant Nuclear Safety Committee (PNSC) and the Corporate Nuclear Safety (CNS) Unit as organizationally described in Appendix A to the facility operating license. Independent off-site QA audits of plant operations shall be performed by the Operation & Maintenance (O&M) Unit as described in Appendix A to the facility operating license.

Review and audit functions are defined as follows:

- a. Review by PNSC and CNS of proposed changes to the Environmental Technical Specifications and the evaluated impact of the change.

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5-1(Prime)

APPENDIX B

Amendment No. 28

BSEP 2

Effective dates: 6/1/79-8/31/79

Objective

This section describes the administrative controls and procedures necessary to implement the Environmental Technical Specifications.

5.1 ORGANIZATION AND REVIEW

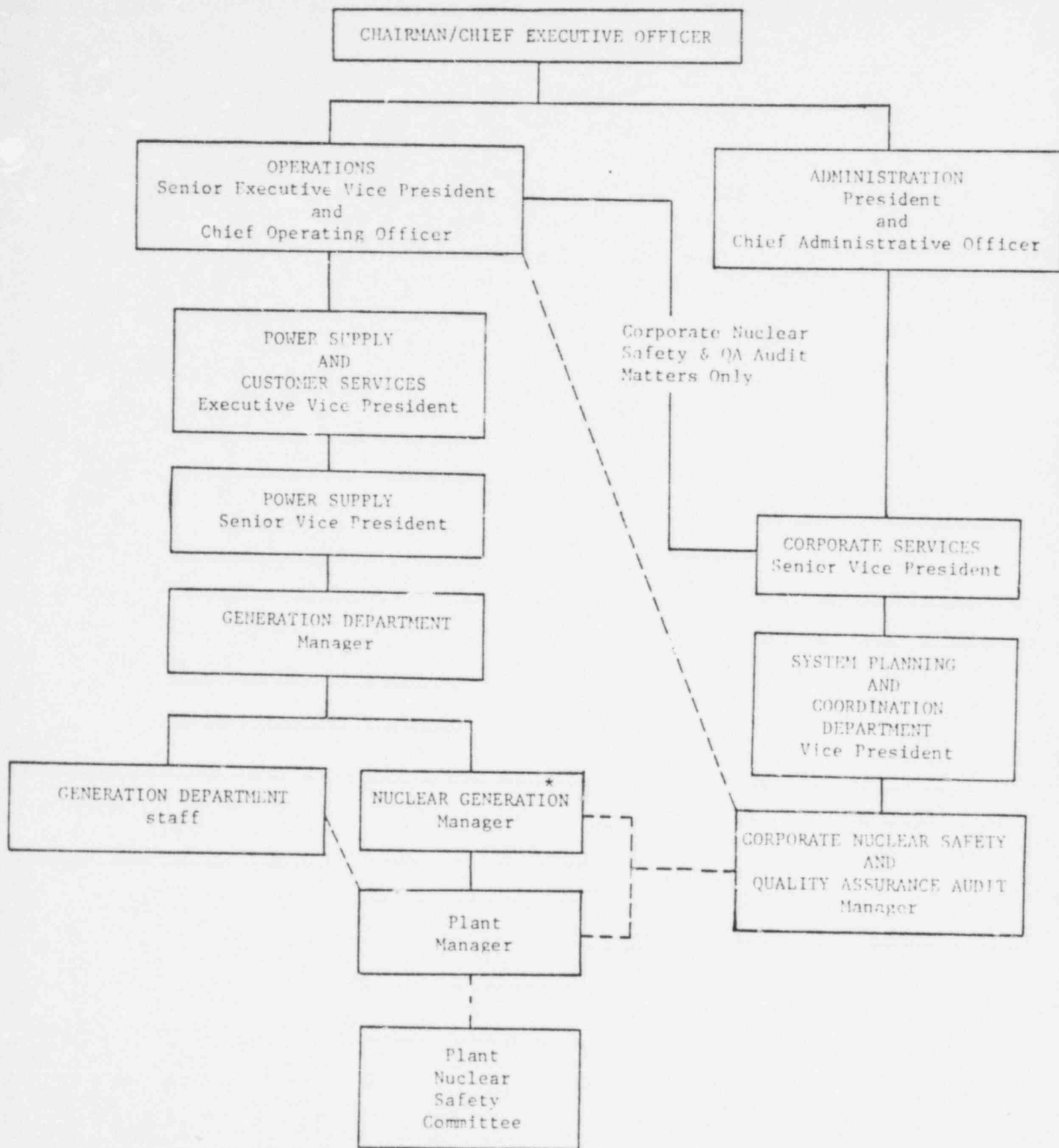
The Plant Manager is directly responsible for the safe operation of the facility as shown in Figure 5.1-1. In all matters pertaining to the operation of the plant and to the Environmental Technical Specifications, the Plant Manager is directly responsible to the Manager of Nuclear Generation. The Environmental and Radiation Control Supervisor is directly responsible to the Plant Manager for all Environmental Technical Specifications applicable to the plant, radiological and otherwise. In the Generation Department, the Manager - Generation Services, Harris Energy & Environmental Center Section, and his staff function in a staff capacity to assist in the proper implementation of the Environmental Technical Specifications.

Review of plant operations and the technical specifications shall be accomplished by the Plant Nuclear Safety Committee (PNSC) and the Corporate Nuclear Safety (CNS) Unit as organizationally described in Appendix A to the facility operating license. Independent off-site QA audits of plant operations shall be performed by the Operation & Maintenance (O&M) Unit as described in Appendix A to the facility operating license.

Review and audit functions are defined as follows:

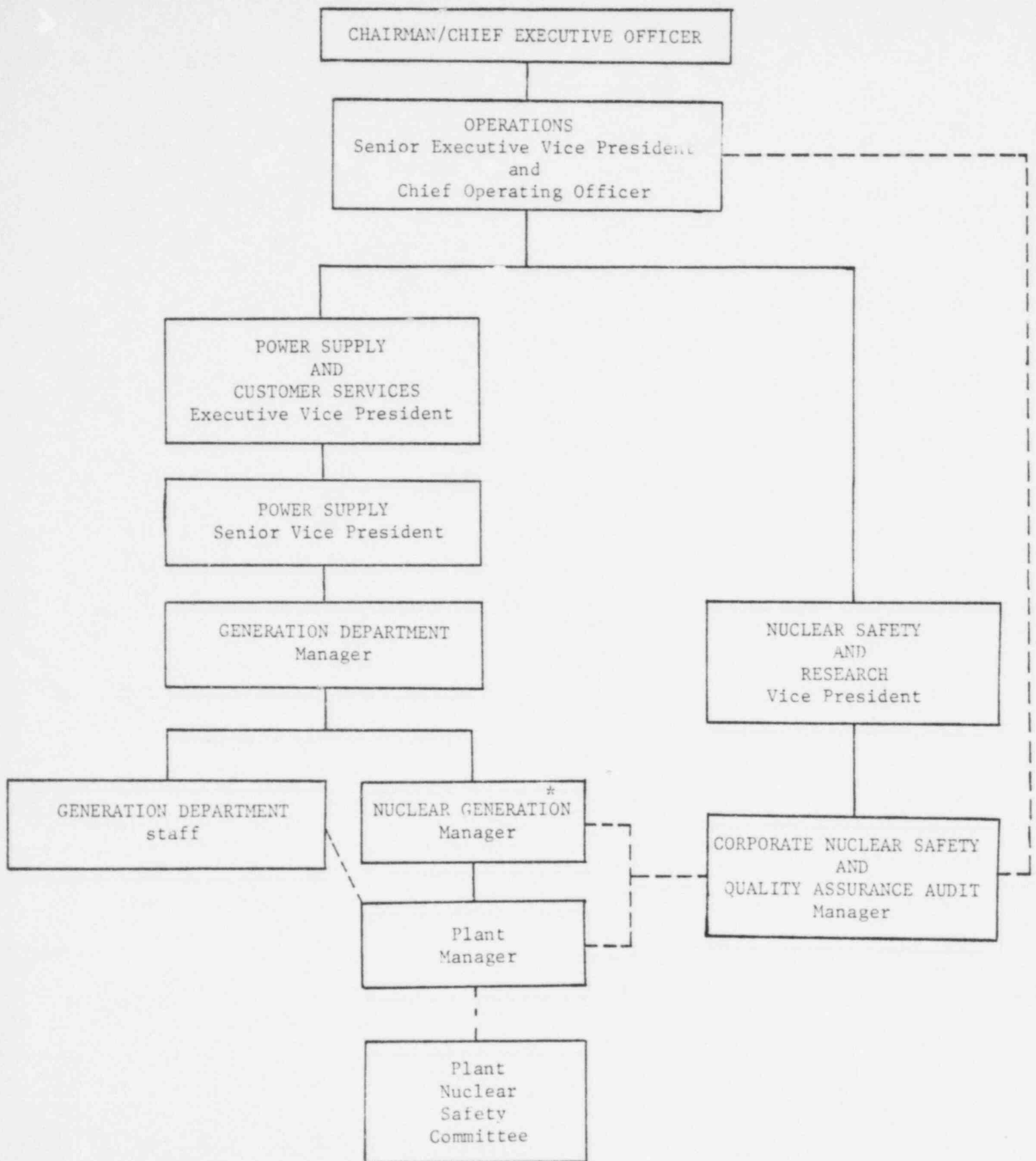
- a. Review by PNSC and CNS of proposed changes to the Environmental Technical Specifications and the evaluated impact of the change.

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*Responsible for performance and monitoring of Fire Protection Program

MANAGEMENT ORGANIZATION CHART
Figure 5.1-1 (Prime)



*Responsible for performance and monitoring of Fire Protection Program. 804

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MANAGEMENT ORGANIZATION CHART

Figure 5.1-1

Effective date: Sept. 1, 1979

- b. Review by PNSC and CNS of changes or modifications to plant systems or equipment which are determined by the Plant Manager to have a significant adverse effect on the environment and the evaluated impact of the change.
- c. Review by PNSC and CNS of written procedures and changes thereto as described in Section 5.3.2 which are determined by the Plant Manager to detrimentally affect the plant's environmental impact.
- d. Investigation by the PNSC of reported instances where an environmental protection limit is exceeded or the occurrence of an unusual environmental event associated with operation of the plant which involves a significant environmental impact. The report and recommendations that result from the PNSC investigation will be reviewed by the CNS.
- e. Corporate quality assurance audit of plant operations and written procedures for implementation of these Technical Specifications by O&M.

5.2 ACTION TO BE TAKEN IN THE EVENT OF AN ENVIRONMENTAL EVENT DURING PLANT OPERATIONS

5.2.1 An environmental event shall be reported promptly to the Manager of Nuclear Generation and reviewed by the Plant Nuclear Safety Committee. The Plant Manager shall take action to abate any impact, immediately following his determination of appropriate action permitted by the technical specifications.

5.2.2 As specified in Section 5.4.2, a report of each environmental event shall be reviewed by the Plant Nuclear Safety Committee. This report shall include an evaluation of the cause of the event, a record of the corrective action taken, and the recommendations for appropriate action to prevent or reduce the probability of a recurrence.

5.2.3 Copies of all such reports shall be submitted to the Manager of Nuclear Generation and the Manager of Corporate Nuclear Safety and Quality Assurance Audit Section for review.

5.2.4 The circumstances of any environmental event shall be reported to the NRC as specified in Section 5.4.2.

5.3

OPERATING PROCEDURES

5.3.1 Written procedures shall be prepared and approved as specified in Section 5.3.2 for operation to ensure compliance with the environmental protection conditions and associated surveillance requirements of Sections 2 and 3. Procedures will include sampling, analysis, and actions to be taken when environmental protection conditions are exceeded. Quality assurance procedures will be developed for monitoring, sample collection, and sample analysis. Testing frequency of any alarms will also be included.

5.3.2 Procedures described in Section 5.3.1 above, and changes thereto, determined by the Plant Manager to detrimentally affect the plant's environmental impact, shall be reviewed as specified in Section 5.1 and approved by the Plant Manager prior to implementation. Temporary changes to procedures which do not change the intent of the original procedure may be made, provided such changes are approved by two members of the plant management staff. Such changes shall be documented, and subsequently reviewed by the Plant Nuclear Safety Committee and approved by the Plant Manager prior to implementation as permanent procedure changes.

5.3.3 Procedures described in Section 5.3.1 above, and changes thereto, which are determined by the Plant Manager to not detrimentally affect the plant's environmental impact shall be reviewed and approved by the Plant Manager or other member of the plant management staff designated by the Plant Manager prior to implementation.

5.3.4 Written procedures shall be prepared and approved

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2.1-1(Prime).

FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figures 6.2.2-1 and 6.2.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1.
- b. At least one licensed Operator shall be in the control room for each reactor containing fuel.
- c. At least two licensed Operators shall be present in the control room for each reactor in the process of start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in either reactor.
- e. All CORE ALTERATIONS shall be 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.
- f. A Fire Brigade of at least five members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew shown in Table 6.2.2-1 or any personnel required for other essential functions during a fire emergency.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

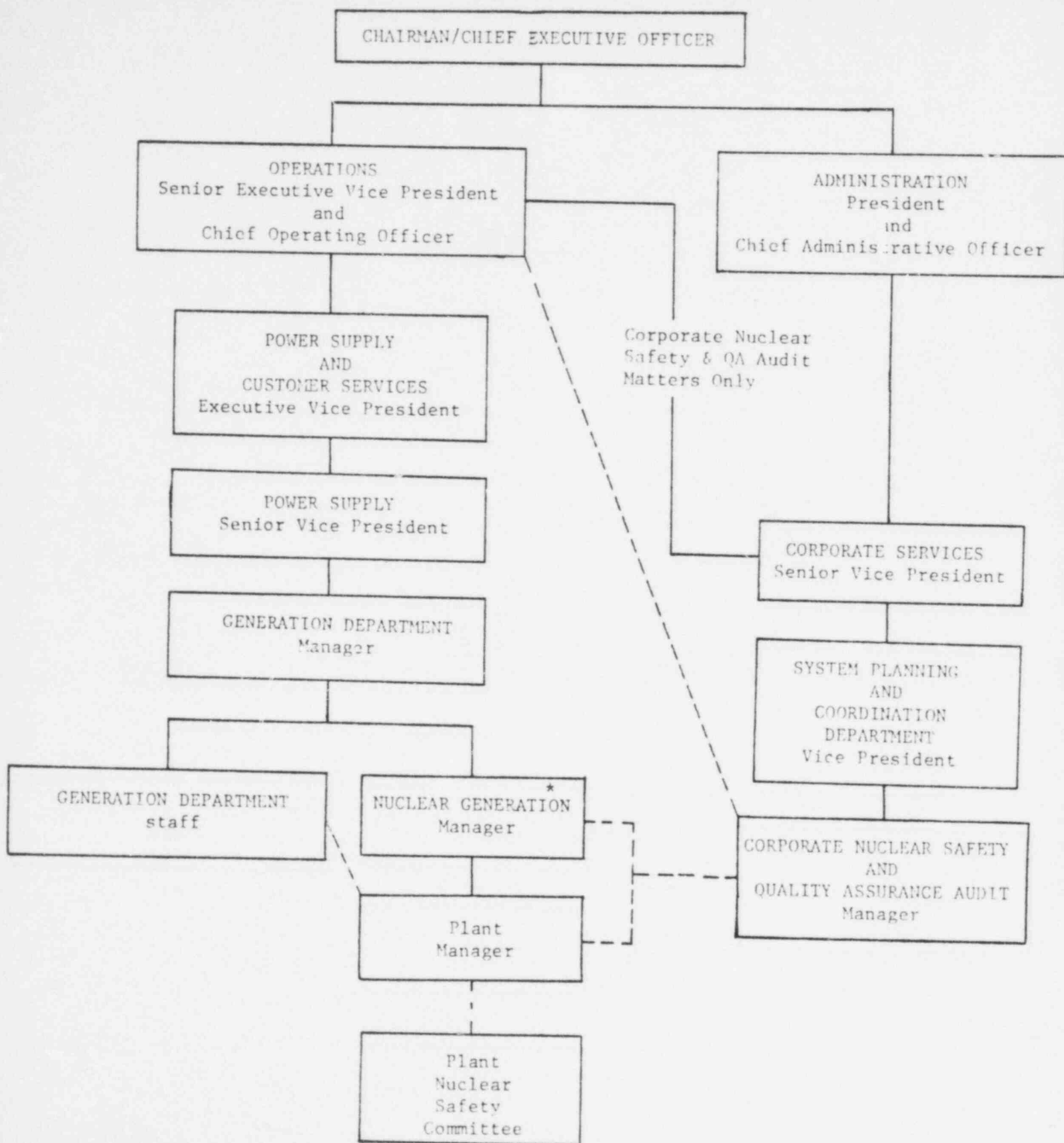
6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2.1-1.

FACILITY STAFF

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- b. At least one licensed Operator shall be in the control room for each reactor containing fuel.
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- d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in either reactor.
- e. All CORE ALTERATIONS shall be 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.
- f. A Fire Brigade of at least five members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew shown in Table 6.2.2-1 or any personnel required for other essential functions during a fire emergency.

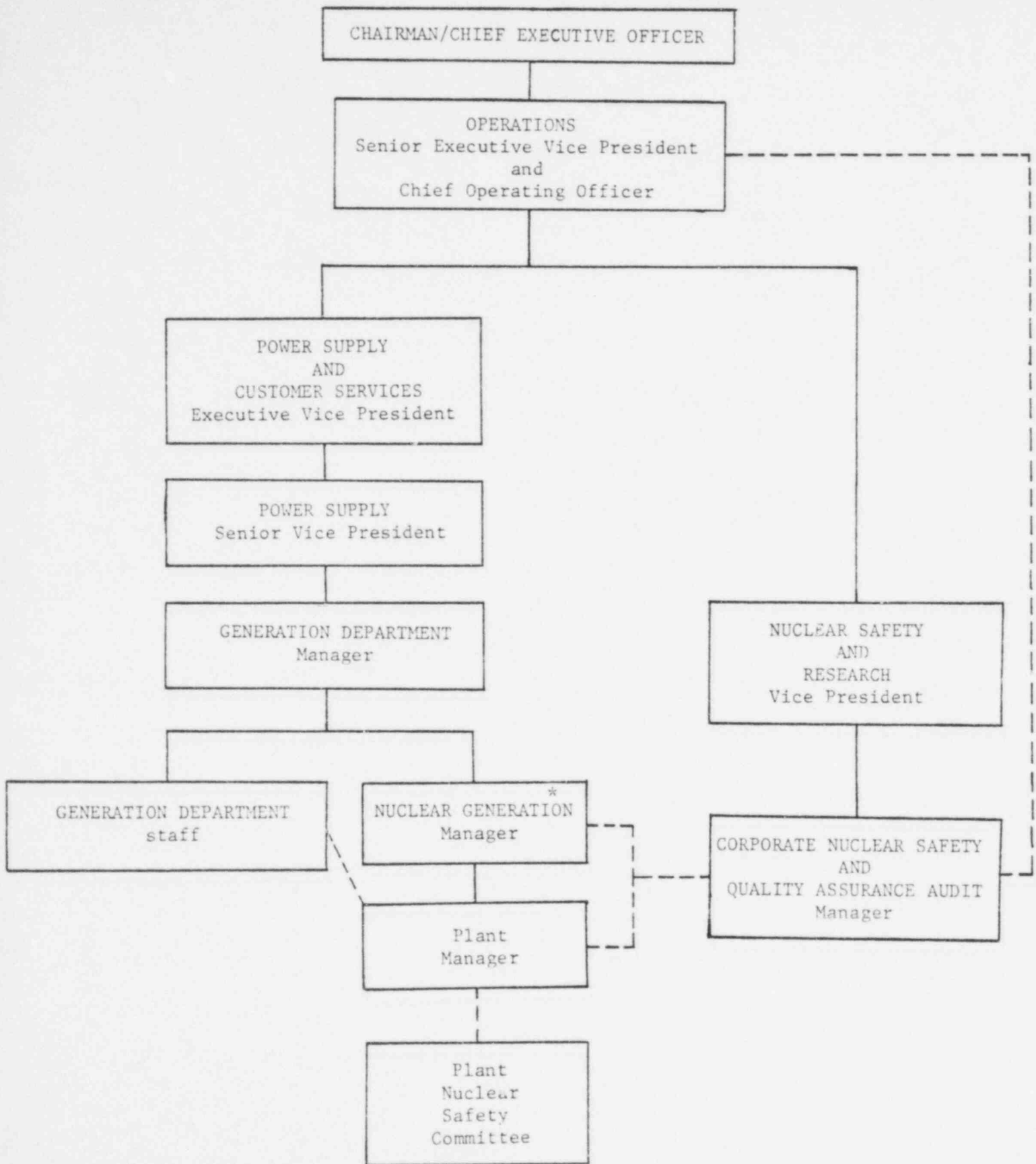
804 073



*Responsible for performance and monitoring of Fire Protection Program.

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MANAGEMENT ORGANIZATION CHART
FIGURE 6.2.1-1(Prime)

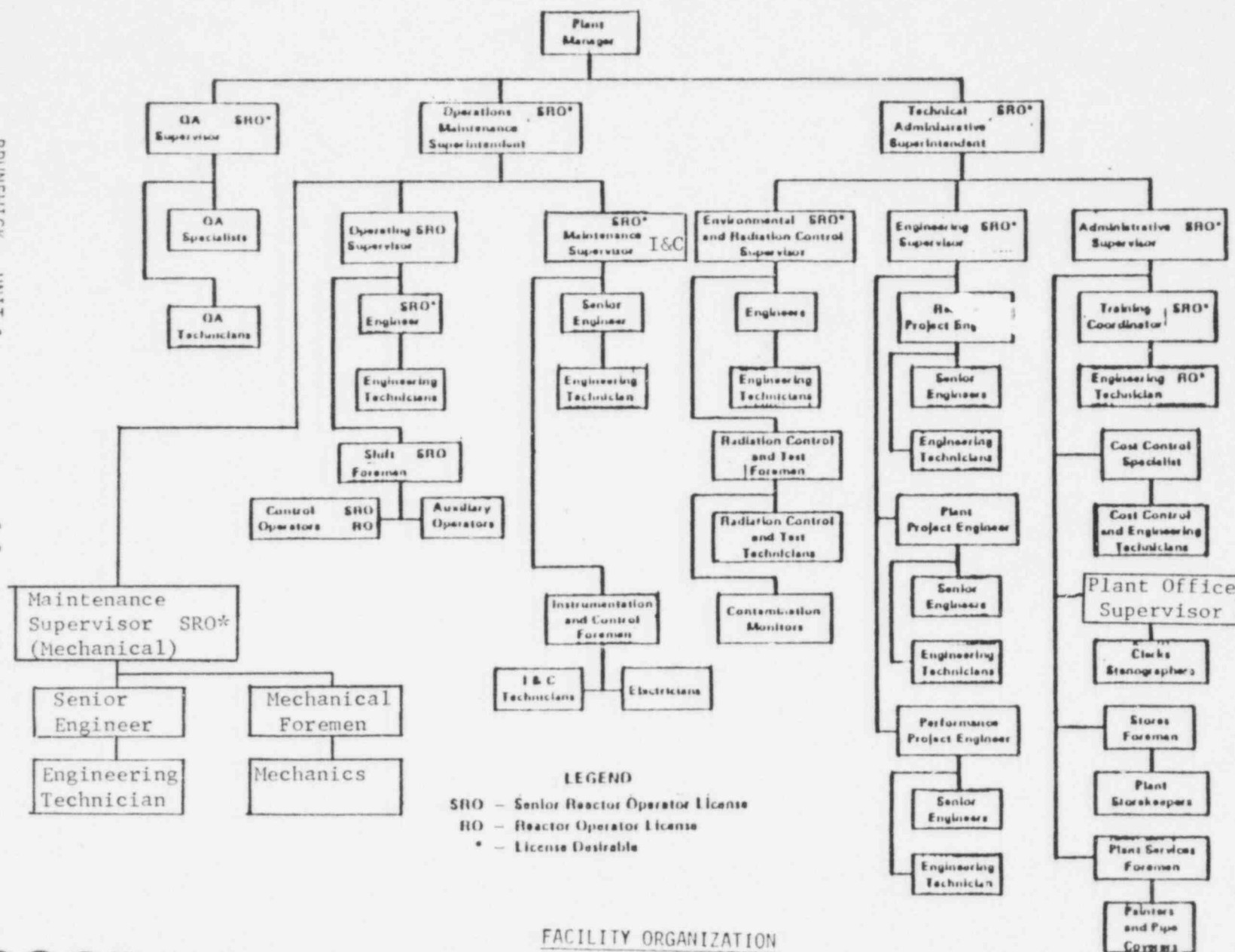


*Responsible for performance and monitoring of Fire Protection Program.

MANAGEMENT ORGANIZATION CHART
FIGURE 6.2.1-1

804 075

Effective date: Sept. 1, 1979



FACILITY ORGANIZATION

Figure 6.2.2-1

POOR ORIGINAL

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for the Radiation Protection Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Coordinator and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Plant Fire Chief and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975.

6.5 REVIEW AND AUDIT

6.5.1 PLANT NUCLEAR SAFETY COMMITTEE (PNSC)

FUNCTION

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

COMPOSITION

6.5.1.2 The PNSC shall be composed of the:

Chairman:	Plant Manager
Vice Chairman:	Operations-Maintenance or Technical- Administrative Superintendent
Secretary:	Administrative Supervisor
Member:	Maintenance Supervisor (I&C)
Member:	Engineering Supervisor
Member:	Environmental and Radiation Control Supervisor
Member:	Quality Assurance Supervisor
Member:	Operating Supervisor
Member:	Maintenance Supervisor (Mechanical)

ALTERNATES

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

ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the PNSC shall consist of the Chairman or Vice Chairman and three members including alternates.

RESPONSIBILITIES

6.5.1.6 The PNSC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.3 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- 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 Manager of Nuclear Generation and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit.
- f. Review of all events requiring 24 hour notification to the Commission.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations and reports thereon as requested by the Manager - Corporate Nuclear Safety and Quality Assurance Audit.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- i. Review of the Plant Security Plan and implementing procedures.
- j. Review of the Emergency Plan and implementing procedures.

AUTHORITY

6.5.1.7 The PNSC shall:

- a. Recommend to the Plant Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- 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 Manager of Nuclear Generation and the Manager - Corporate Nuclear Safety and Quality Assurance Audit of disagreement between the PNSC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The PNSC shall maintain written minutes of each meeting and copies shall be provided to the Manager of Nuclear Generation and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit.

6.5.2 Corporate Nuclear Safety & Quality Assurance Audit Section
 (CNS & QAAS)

Responsibility

6.5.2.1 The Manager - Corporate Nuclear Safety & Quality Assurance Audit under the Vice President-System Planning & Coordination is charged with the overall responsibility for administering the independent off-site review and quality assurance audit programs as follows:

- a. Approves selection of the individual(s) to conduct off-site safety reviews and quality assurance audits.
- b. Has access to the plant operating records and operating personnel in performing the independent reviews and quality assurance audits.
- c. Prepares and retains written records of reviews and audits.
- d. Assures independent safety reviews are conducted on all items required by Section 6.5.3.3 and quality assurance audits cover all the items included in Section 6.5.4.1.
- e. Distributes reports and other records to appropriate managers.

6.5.3 Corporate Nuclear Safety Unit

Function

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ADMINISTRATIVE CONTROLS

6.5.2 Corporate Nuclear Safety & Quality Assurance Audit Section (CNS & QAAS)

Responsibility

6.5.2.1 The Manager - Corporate Nuclear Safety & Quality Assurance Audit under the Vice President-Nuclear Safety and Research is charged with the overall responsibility for administering the independent off-site review and quality assurance audit programs as follows:

- a. Approves selection of the individual(s) to conduct off-site safety reviews and quality assurance audits.
- b. Has access to the plant operating records and operating personnel in performing the independent reviews and quality assurance audits.
- c. Prepares and retains written records of reviews and audits.
- d. Assures independent safety reviews are conducted on all items required by Section 6.5.3.3 and quality assurance audits cover all the items included in Section 6.5.4.1.
- e. Distributes reports and other records to appropriate managers.

6.5.3 Corporate Nuclear Safety Unit

Function

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6.5.3.1 The Corporate Nuclear Safety Unit of the Corporate Nuclear Safety & Quality Assurance Audit Section shall provide independent off-site review of significant plant changes, tests, and procedures; verify that reportable occurrences are promptly investigated and corrected in a manner which reduces the probability of recurrence of such events; and detect trends which may not be apparent to a day-to-day observer.

Personnel

6.5.3.2

- a. Personnel assigned responsibility for independent reviews shall be specified in technical disciplines, and shall collectively have the experience and competence required to review problems in the following areas:

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
9. Seismic and environmental
10. Quality assurance practices

- b. The following minimum experience requirements shall be established for those persons involved in the independent off-site safety review program:

1. Manager of CNS & QAAS - Bachelor of Science in engineering or related field and ten (10) years related experience including five (5) years involvement with operation and/or design of nuclear power plants.
 2. Reviewers - Bachelor of Science in engineering or related field or equivalent and five (5) years related experience including three (3) years involvement with operation and/or design of nuclear power plants.
- c. An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Corporate Nuclear Safety Unit, competent individuals from other CP&L organizations or outside consultants shall be utilized in performing independent off-site reviews and investigations.
- d. At least three persons, qualified as discussed in Specification 6.5.3.2.b, will review each item submitted under the requirements of 6.5.3.3.
- e. Independent safety reviews shall be performed by personnel not directly involved with the activity or responsible for the activity.

Subjects Requiring Independent Review

6.5.3.3 The following subjects shall be reviewed by the Corporate Nuclear Safety Unit:

- a. Written safety evaluations of changes in the facility 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).
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the technical specifications or an unreviewed safety question pursuant to 10 CFR 50.59(c). Matters of this kind shall be referred to the Corporate Nuclear Safety Unit by the Plant Nuclear Safety Committee following its review, or by other functional organizational units within Carolina Power & Light Company (CP&L) 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, deviations and reportable events, which require reporting to the NRC within 24 hours, and as defined in the plant technical specifications such as:
 1. Violations of applicable codes, regulations, orders, technical specifications, license requirements or internal procedures or instructions having safety significance; and

2. Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components.

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

- e. Any other matter involving safe operation of the nuclear power plant which the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section deems appropriate for consideration, or which is referred to the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section by the onsite operating organization or by other functional organizational units within Carolina Power & Light Company.

Follow-up Action

6.5.3.4 Results of Corporate Nuclear Safety (CNS) reviews, including recommendations and concerns will be documented.

- a. Copies of the documented review will be retained in the Corporate Nuclear Safety & Quality Assurance Audit Section files.
- b. Recommendations and concerns will be submitted to the Manager - Nuclear Generation within 14 days of determination.
- c. A summation of Corporate Nuclear Safety recommendations and concerns will be submitted to the Chairman/Chief Executive

Officer; Chief Operating Officer; Executive Vice President-Power Supply and Customer Services; Senior Vice President-Power Supply; Vice President-System Planning & Coordination; Plant Manager; and others, as appropriate on at least a bi-monthly frequency.

6.5.3.5 The Corporate Nuclear Safety Unit review program shall be conducted in accordance with written, approved procedures.

6.5.4 Operation & Maintenance Unit

Function

6.5.4.1 The Operation & Maintenance Unit of the Corporate Nuclear Safety & Quality Assurance Audit Section shall perform audits of plant activities. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per six months.
- d. The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.

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Officer; Chief Operating Officer; Executive Vice President-Power Supply and Customer Services; Senior Vice President-Power Supply; Vice President-Nuclear Safety and Research; Plant Manager; and others, as appropriate on at least a bi-monthly frequency.

6.5.3.5 The Corporate Nuclear Safety Unit review program shall be conducted in accordance with written, approved procedures.

6.5.4 Operation & Maintenance Unit

Function

6.5.4.1 The Operation & Maintenance Unit of the Corporate Nuclear Safety & Quality Assurance Audit Section shall perform audits of plant activities. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per six months.
- d. The verification of compliance and implementation of the requirements of the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.

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- e. The Emergency Plan and implementing procedures at least once per two years.
- f. The Security Plan and implementing procedures at least once per two years.
- g. The Facility Fire Protection Program and implementing procedures at least once per two years.
- h. Any other area of facility operation considered appropriate by the Corporate Quality Assurance Audit Operation & Maintenance Unit, the Executive Vice President-Power Supply and Customer Services, or the Senior Vice President-Power Supply.

Personnel

6.5.4.2

- a. Audit personnel will be independent of the area audited. Selection for auditing assignments is based on experience or training which establishes that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting auditing personnel, consideration will be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics, and education.
- b. Qualified outside consultants or other individuals independent from those personnel directly involved in plant operation, but within the Operations Groups will be used to augment the audit teams when necessary.

ADMINISTRATIVE CONTROLS

Reports

6.5.4.3 Results of audit are approved by the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section and transmitted directly to the Company Chairman/Chief Executive Officer, the Chief Operating Officer, the Executive Vice President-Power Supply and Customer Services, the Senior Vice President-Power Supply, and the Vice President-System Planning & Coordination, and others as appropriate, within 30 days after the completion of the audit.

6.5.4.4 The corporate quality assurance audit program shall be conducted in accordance with written, approved procedures.

6.5.5 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM

6.5.5.1 An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing an outside fire protection firm.

6.5.5.2 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.

ADMINISTRATIVE CONTROLS

Reports

6.5.4.3 Results of audit are approved by the Manager - Corporate Nuclear Safety & Quality Assurance Audit Section and transmitted directly to the Company Chairman/Chief Executive Officer, the Chief Operating Officer, the Executive Vice President-Power Supply and Customer Service, the Senior Vice President-Power Supply, and the Vice President-Nuclear Safety and Research, and others as appropriate, within 30 days after the completion of the audit.

6.5.4.4 The corporate quality assurance audit program shall be conducted in accordance with written, approved procedures.

6.5.5 OUTSIDE AGENCY INSPECTION AND AUDIT PROGRAM

6.5.5.1 An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing an outside fire protection firm.

6.5.5.2 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.

ADMINISTRATIVE CONTROLS

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the PNSC and submitted to Manager - Corporate Nuclear Safety and Quality Assurance Audit and the Manager of Nuclear Generation.

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 SHUTDOWN within two hours.
- b. The Safety Limit violation shall be reported to the Commission, the Manager Nuclear Generation and to the Manager - Corporate Nuclear Safety and Quality Assurance Audit within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSC. 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 Manager - Corporate Nuclear Safety and Quality Assurance Audit and the Manager of Nuclear Generation within 14 days of the violation.

6.8 PROCEDURES

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, November, 1972.
- 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.

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

- h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components identified in Table 5.7.1-1.
- g. Records of reactor tests and experiments.
- h. Records of training and qualification for current members of the plant staff.
- i. Records of in-service inspections performed pursuant to these Technical Specifications.
- j. Records of Quality Assurance activities required by the QA Manual.
- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- l. Records of meetings of the PNSC and of the previous off-site review organization, Company Nuclear Safety Committee (CNSC).

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Objective

This section describes the administrative controls and procedures necessary to implement the Environmental Technical Specifications.

5.1 ORGANIZATION AND REVIEW

The Plant Manager is directly responsible for the safe operation of the facility as shown in Figure 5.1-1(Prime). In all matters pertaining to the operation of the plant and to the Environmental Technical Specifications, the Plant Manager is directly responsible to the Manager of Nuclear Generation. The Environmental and Radiation Control Supervisor is directly responsible to the Plant Manager for all Environmental Technical Specifications applicable to the plant, radiological and otherwise. In the Generation Department, the Manager - Generation Services, Harris Energy & Environmental Center Section, and his staff function in a staff capacity to assist in the proper implementation of the Environmental Technical Specifications.

Review of plant operations and the technical specifications shall be accomplished by the Plant Nuclear Safety Committee (PNSC) and the Corporate Nuclear Safety (CNS) Unit as organizationally described in Appendix A to the facility operating license. Independent off-site QA audits of plant operations shall be performed by the Operation & Maintenance (O&M) Unit as described in Appendix A to the facility operating license.

Review and audit functions are defined as follows:

- a. Review by PNSC and CNS of proposed changes to the Environmental Technical Specifications and the evaluated impact of the change.

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Objective

This section describes the administrative controls and procedures necessary to implement the Environmental Technical Specifications.

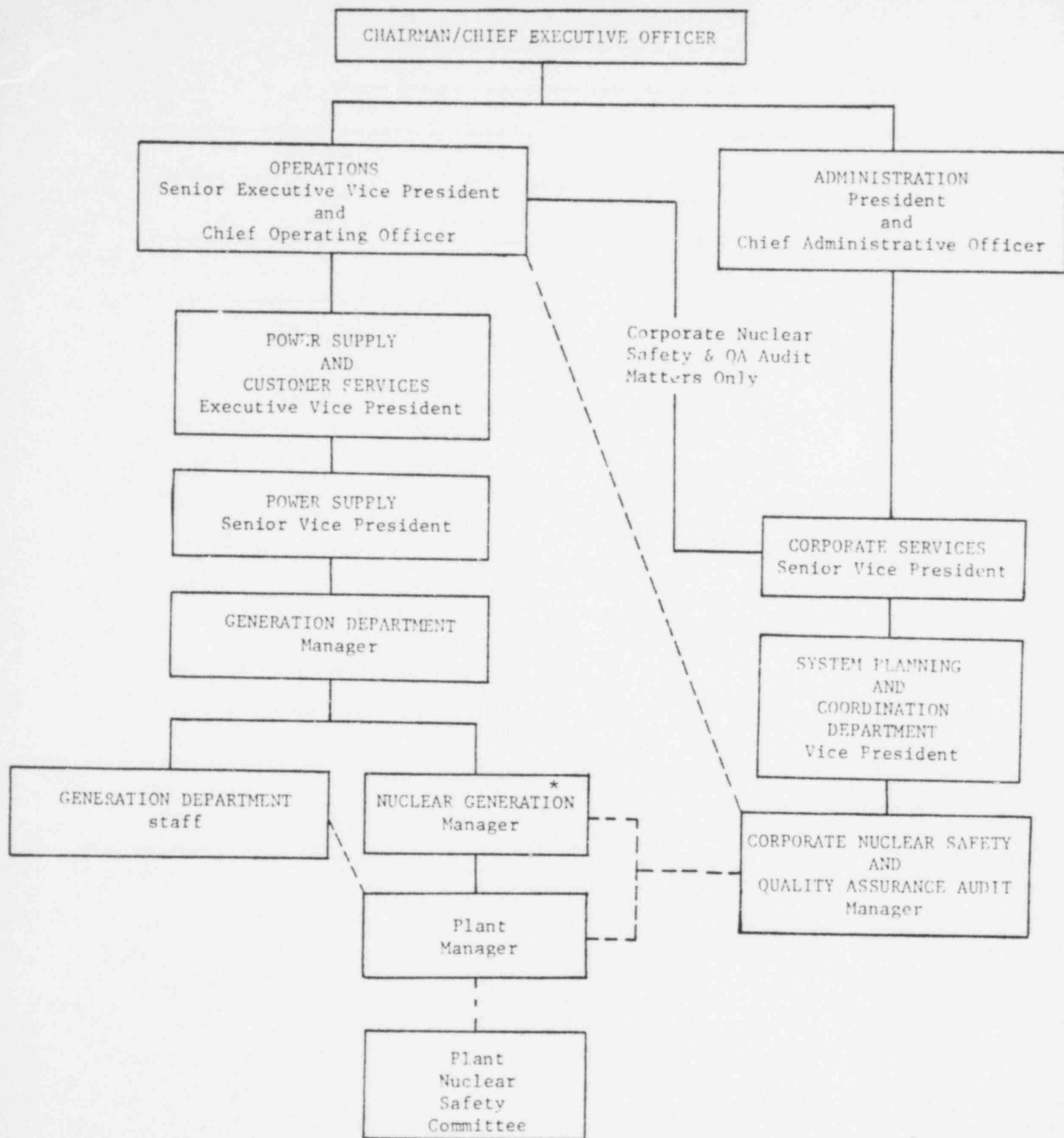
5.1 ORGANIZATION AND REVIEW

The Plant Manager is directly responsible for the safe operation of the facility as shown in Figure 5.1-1. In all matters pertaining to the operation of the plant and to the Environmental Technical Specifications, the Plant Manager is directly responsible to the Manager of Nuclear Generation. The Environmental and Radiation Control Supervisor is directly responsible to the Plant Manager for all Environmental Technical Specifications applicable to the plant, radiological and otherwise. In the Generation Department, the Manager - Generation Services, Harris Energy & Environmental Center Section, and his staff function in a staff capacity to assist in the proper implementation of the Environmental Technical Specifications.

Review of plant operations and the technical specifications shall be accomplished by the Plant Nuclear Safety Committee (PNSC) and the Corporate Nuclear Safety (CNS) Unit as organizationally described in Appendix A to the facility operating license. Independent off-site QA audits of plant operations shall be performed by the Operation & Maintenance (O&M) Unit as described in Appendix A to the facility operating license.

Review and audit functions are defined as follows:

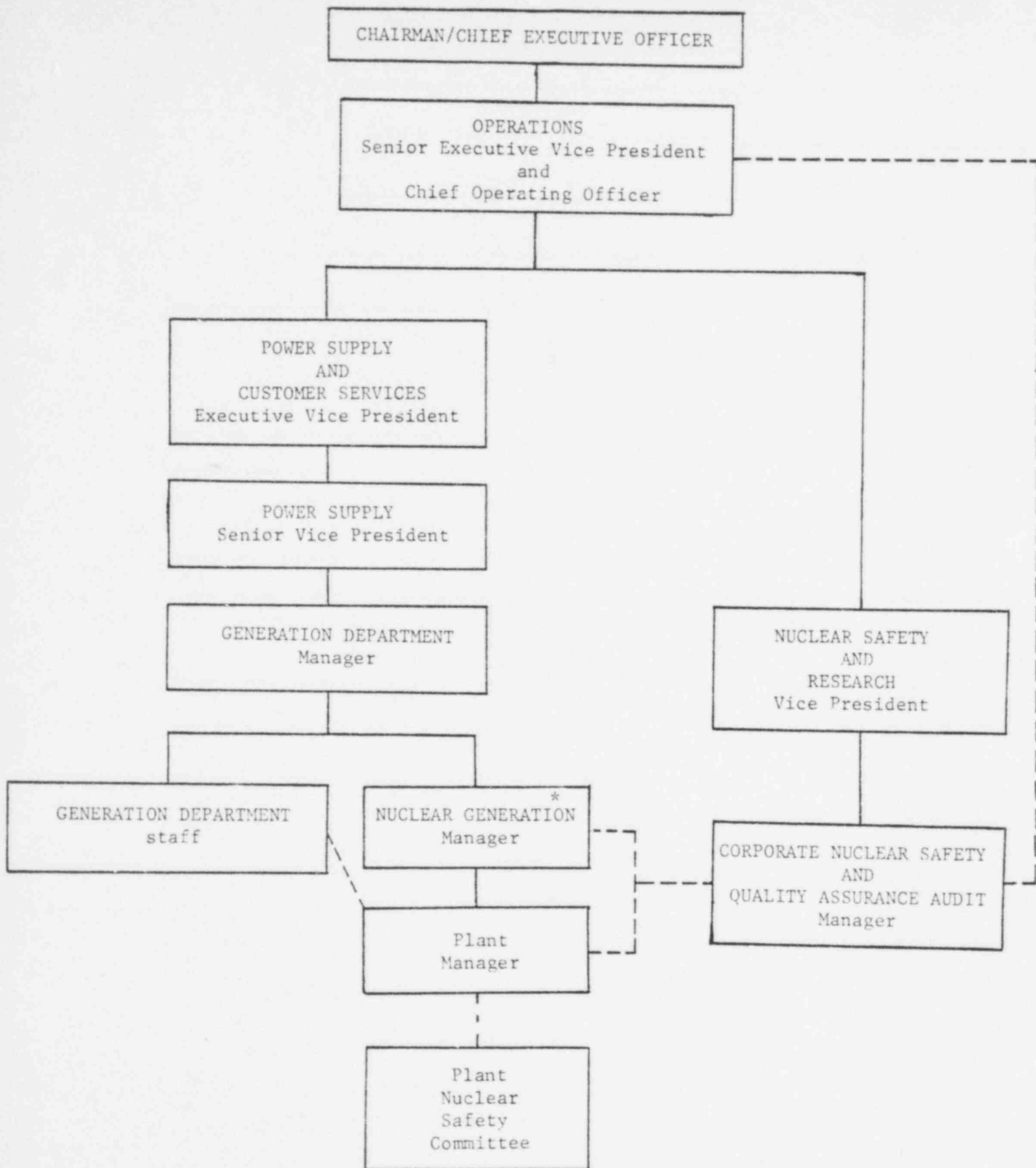
- a. Review by PNSC and CNS of proposed changes to the Environmental Technical Specifications and the evaluated impact of the change.



*Responsible for performance and monitoring of Fire Protection Program.

MANAGEMENT ORGANIZATION CHART
Figure 5.1-1(Prime)

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*Responsible for performance and monitoring of Fire Protection Program.

MANAGEMENT ORGANIZATION CHART
Figure 5.1-1

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- b. Review by PNSC and CNS of changes or modifications to plant systems or equipment which are determined by the Plant Manager to have a significant adverse effect on the environment and the evaluated impact of the change.
- c. Review by PNSC and CNS of written procedures and changes thereto as described in Section 5.3.2 which are determined by the Plant Manager to detrimentally affect the plant's environmental impact.
- d. Investigation by the PNSC of reported instances where an environmental protection limit is exceeded or the occurrence of an unusual environmental event associated with operation of the plant which involves a significant environmental impact. The report and recommendations that result from the PNSC investigation will be reviewed by the CNS.
- e. Corporate quality assurance audit of plant operations and written procedures for implementation of these Technical Specifications by O&M.

5.2 ACTION TO BE TAKEN IN THE EVENT OF AN ENVIRONMENTAL EVENT DURING PLANT OPERATIONS

5.2.1 An environmental event shall be reported promptly to the Manager of Nuclear Generation and reviewed by the Plant Nuclear Safety Committee. The Plant Manager shall take action to abate any impact, immediately following his determination of appropriate action permitted by the technical specifications.

5.2.2 As specified in Section 5.4.2, a report of each environmental event shall be reviewed by the Plant Nuclear Safety Committee. This report shall include an evaluation of the cause of the event, a record of the corrective action taken, and the recommendations for appropriate action to prevent or reduce the probability of a recurrence.

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POOR ORIGINAL

5.2.3 Copies of all such reports shall be submitted to the Manager of Nuclear Generation and the Manager of Corporate Nuclear Safety and Quality Assurance Audit Section for review.

5.2.4 The circumstances of any environmental event shall be reported to the NRC as specified in Section 5.4.2.

5.3

OPERATING PROCEDURES

5.3.1 Written procedures shall be prepared and approved as specified in Section 5.3.2 for operation to ensure compliance with the environmental protection conditions and associated surveillance requirements of Sections 2 and 3. Procedures will include sampling, analysis, and actions to be taken when environmental protection conditions are exceeded. Quality assurance procedures will be developed for monitoring, sample collection, and sample analysis. Testing frequency of any alarms will also be included.

5.3.2 Procedures described in Section 5.3.1 above, and changes thereto, determined by the Plant Manager to detrimentally affect the plant's environmental impact, shall be reviewed as specified in Section 5.1 and approved by the Plant Manager prior to implementation. Temporary changes to procedures which do not change the intent of the original procedure may be made, provided such changes are approved by two members of the plant management staff. Such changes shall be documented, and subsequently reviewed by the Plant Nuclear Safety Committee and approved by the Plant Manager prior to implementation as permanent procedure changes.

5.3.3 Procedures described in Section 5.3.1 above, and changes thereto, which are determined by the Plant Manager to not detrimentally affect the plant's environmental impact shall be reviewed and approved by the Plant Manager or other member of the plant management staff designated by the Plant Manager prior to implementation.

5.3.4 Written procedures shall be prepared and approved

POOR ORIGINAL

804 098