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ADMINISTRATIVE CONTROLS

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PROCEDURES AND PROGRAMS (Continued)

6.8.2 Each plant administrative procedure, and changes thereto, shall be reviewed in accordance with Specification 6.5.1.6, and approved by the Plant Manager prior to implementation, and shall be reviewed periodically thereafter as set forth in administrative procedures.

6.8.3 Each plant procedure required by Specification 6.8.1, other than administrative procedures, and changes thereto, shall be reviewed in accordance with 6.5.3, and approved by the Plant Manager prior to implementation and shall be reviewed periodically thereafter as set forth in administrative procedures. The Plant Manager may delegate approval authority in writing for specific types of procedures to a management representative responsible for the functional area.

6.8.4 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on Fermi 2; and
- c. The change is documented, and reviewed and approved in accordance with either 6.8.2 or 6.8.3 above, as appropriate, within 14 days of implementation.

6.8.5 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the HPCI, CS, RHR, RCIC, reactor water sampling, containment sampling, reactor water cleanup, combustible gas control, control rod drive discharge headers, and standby gas treatment systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

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ANNUAL REPORTS (Continued)

- (1) reactor power history starting 48 hours prior to the first sample in which the limit was exceeded;
- (2) results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit (each result should include date and time of sampling and the radioiodine concentrations);
- (3) clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded;
- (4) graph of the I-131 and one other radioiodine isotope concentrations in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and
- (5) the time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.7 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 90 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

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6.13 PROCESS CONTROL PROGRAM (PCP) (Continued)

- 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the OSRO and the approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the OSRO and the approval of the Plant Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.