

## APPENDIX "A"

## ADMINISTRATIVE CONTROLS

### ORGANIZATION

#### Responsibility

The Plant Manager is directly responsible for the safe and efficient operation of the plant by providing direction for operation, radiological, engineering, and maintenance support activities. The Plant Manager reports to the Site Manager who has overview and coordination responsibility for ensuring the safe and efficient operation of Cooper Nuclear Station. During periods of time when the Plant Manager is unavailable, his responsibilities automatically shift to the Senior Manager of Operations. During periods of time when the Plant Manager and the Senior Manager of Operations are not available, the responsibilities of the Plant Manager may be delegated in writing to one of the managers on the Cooper Nuclear Station Site staff qualified for this position.

#### 4.1.2 Offsite and Onsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- A. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR.
- B. The Site Manager shall have overview and coordinate the activities of the following positions:
  - B.1 The Plant Manager who is responsible for overall safe unit operation and who has control over those onsite activities necessary for safe operation and maintenance of the plant.
  - B.2 The Senior Manager of Site Support who is directly responsible for supporting the safe and efficient operation of the plant by providing direction for training, outage and modification coordination, station security, and administrative support.
- C. The Nuclear Power Group Manager shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- D. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

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#### 4.1.3 Plant Staff - Shift Complement

The shift complement at the station shall at all times meet the following requirements. Note: Higher grade licensed operators may take the place of lower grade licensed or unlicensed operators.

- A. A licensed senior reactor operator (SRO) shall be present at the station at all times when there is any fuel in the reactor.
- B. A licensed reactor operator shall be in the control room at all times when there is any fuel in the reactor.
- C. Two licensed reactor operators shall be in the control room during all startup, shutdown and other periods involving significant planned control rod manipulations. A licensed SRO shall either be in the Control Room or immediately available to the Control Room during such periods.

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Investigate all violations of Technical Specifications, including reporting evaluation and recommendations to prevent recurrence, to the Nuclear Power Group Manager and to the Chairman of the NPPD Safety Review and Audit Board.

- g. Perform special reviews and investigations and render reports thereon as requested by the Chairman of the Safety Review and Audit Board.
- h. Review all reportable events specified in Section 50.73 to 10CFR Part 50.
- i. Review drills on emergency procedures (including plant evacuation) and adequacy of communication with off site groups.
- j. Periodically review procedures required by Specifications 6.3.1, 6.3.2, 6.3.3, and 6.3.4 as set forth in administrative procedures.

5. Authority:

- a. The Station Operations Review Committee shall be advisory.
- b. The Station Operations Review Committee shall recommend to the SORC Chairman approval or disapproval of proposals under items 4. a through e and j above. In case of disagreement between the recommendations of the Station Operations Review Committee and the Plant Manager, the course determined by the Plant Manager to be the more conservative will be followed. A written summary of the disagreement will be sent to the Site Manager, Nuclear Power Group Manager, and to the NPPD Safety Review and Audit Board.
- c. The Station Operations Review Committee shall report to the Chairman of the NPPD Safety Review and Audit Board on all reviews and investigations conducted under items 4.f, 4.g, 4.h, and 4.i.
- d. The Station Operations Review Committee shall make determinations regarding whether or not proposals considered by the Committee involve unreviewed safety questions. This determination shall be subject to review by the NPPD Safety Review and Audit Board.

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6. Records:

Minutes shall be kept for all meetings of the Station Operations Review Committee and shall include identification of all documentary material reviewed. Copies of the minutes shall be forwarded to the Chairman of the NPPD Safety Review and Audit Board and the Nuclear Power Group Manager within one month.

7. Procedures:

Written administrative procedures for Committee operation shall be prepared and maintained describing the method for submission and conduct of presentations to the committee, provisions for use of subcommittees, review and approval by members of written Committee evaluations and recommendations, dissemination of minutes, and such other matters as may be appropriate.

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- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Appendix A Technical Specifications or the CNS Operating License.
- e. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All reportable events specified in Section 50.73 to 10CFR Part 50.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Minutes of meetings of the Station Operations Review Committee.
- j. Disagreement between the recommendations of the Station Operations Review Committee and the SORC Chairman.
- k. Review of events covered under e,f,g. and h above include reporting to appropriate members of management on the results of investigations and recommendations to prevent or reduce the probability of recurrence.

5. Authority: The NPPD Safety Review and Audit Board shall report to and be advisory to the Nuclear Power Group Manager on those areas of responsibility specified in Specifications 6.2.1.B.4 and 6.2.1.B.7.

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Minutes shall be recorded for all meetings of the NPPD Safety Review and Audit Board and shall identify all documentary material reviewed. Copies of the minutes shall be forwarded to the Nuclear Power Group Manager, Site Manager, and the Plant Manager, and such others as the Chairman may designate within one month of the meeting.

7. Audits:

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Audits of selected aspects of plant operation shall be performed under the cognizance of SRAB with a frequency commensurate with their safety significance. Audits performed by the Quality Assurance Department which meet this specification shall be considered to meet the SRAB audit requirements if the audit results are reviewed by SRAB. A representative portion of procedures and records of the activities performed during the audit period shall be audited and, in addition, observations of performance of operating and maintenance activities shall be included. These audits shall encompass:

Core Operating Limits Report (Continued)

- b. The Linear Heat Generation Rate for Specification 3.11.B.
- c. The  $K_f$  core flow MCPR adjustment factor for Specification 3.11.C.
- d. The minimum critical power ratio (MCPR) for Specification 3.11.C.
- e. The rod block monitor upscale setpoint for Table 3.2.C of Specification 3.2.C.

The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel." (The approved revision at the time the reload analyses are performed.) The approved revision number shall be identified in the Core Operating Limits Report.

The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, transient analysis limits, and accident analysis limits) of the safety analysis are met.

The Core Operating Limits Report, including any mid-cycle revisions or supplements thereto, shall be provided, upon issuance for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

6.5.2

Reportable Events

A Reportable Event shall be any of those conditions specified in Section 50.73 to 10CFR Part 50. The NRC shall be notified and a report submitted pursuant to the requirements of Section 50.73. Each Reportable Event shall be reviewed by SORC and the results of this review shall be submitted to SRAB and the Nuclear Power Group Manager.

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## APPENDIX "B"





6.2 (cont d)

- f. Investigate all violations of Technical Specifications, including reporting evaluation and recommendations to prevent recurrence, to the Vice President-Nuclear to the Chairman of the NPPD Safety Review and Audit Board.
- g. Perform special reviews and investigations and render reports thereon as requested by the Chairman of the Safety Review and Audit Board.
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- c. The Station Operations Review Committee shall report to the Chairman of the NPPD Safety Review and Audit Board on all reviews and investigations conducted under items 4.f, 4.g, 4.h, and 4.i.
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