

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Director, Perry Nuclear Engineering Department (PNED).

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers or technically oriented individuals located onsite. Each shall have either (1) a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field, or (2) equivalent work experience as described in Section 4.1 of ANSI/ANS 3.1, December 1981.

RESPONSIBILITIES

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

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Director, Perry Nuclear Engineering Department.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971** for comparable positions, except for the Plant Health Physicist who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees and the licensed Operators and Senior Operators who shall comply with the requirements of 10 CFR 55.

*Not responsible for sign-off function.

**The active duties of Manager, Perry Operations Section, can be conducted without the designated individual holding an SRO License until issuance of an SRO License upon completion of the August 1995 License Examination.

PERRY - UNIT 1

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Amendment No. 22, 42, 47

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ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Perry Training Section Manager, 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 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience. Deleted

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the General Manager, Perry Nuclear Power Plant Department (PNPPD), on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PORC shall be composed of the:

Chairman:	Director, Perry Nuclear Engineering Department
Vice-Chairman/Member:	Manager, Perry Operations Section
Member:	Manager, Systems Engineering Section
Member:	Manager, Perry Maintenance Section
Member:	Reactor Engineer
Member:	Manager, Radiation Protection Section
Member:	Plant Health Physicist
Member:	Manager, Instrumentation and Control Section
Member:	Manager, Licensing and Compliance Section

ALTERNATES

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

MEETING FREQUENCY

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

SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for an amendment involves no significant hazards considerations are included in the Commission's Regulations, 10 CFR 50.92, which state that the operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any previously evaluated, or (3) involve a significant reduction in a margin of safety. The proposed amendment has been reviewed with respect to these three factors and it has been determined that the proposed changes do not involve a significant hazard because:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed Technical Specification changes are administrative changes to eliminate inconsistencies with the current regulations for unit staff qualifications and training programs. The proposed changes are being made to remove language describing or committing to any previous training programs, since the training programs at PNPP have been accredited and certified in accordance with the revised 10 CFR 55 and 10 CFR 50.120 rules, GL 87-07 and NUREG-1262. The proposed changes delete reference to the March 28, 1980 NRC letter (the Denton Letter) for licensed operator qualifications and training programs and, for licensed operator qualifications, will substitute compliance with the requirements of 10 CFR 55. The proposed changes also include the deletion of Specification 6.4.1 "Training," since training of both licensed operators and other appropriate unit staff personnel is now governed by regulations (10 CFR 55 and 10 CFR 50.120).

The proposed changes will have no significant adverse impact on accident probability or consequence. The NRC, during the rulemaking process, has considered any impact that licensed operator qualifications and training programs may have on accidents previously evaluated, and by promulgation of the revised 10 CFR 55 rule, concluded that this impact remains unchanged as long as licensed operator training programs are certified to be accredited and based on a systems approach to training in accordance with GL 87-07. CEI provided such certification for PNPP Unit 1 by letter PY-CEI/NRR-0866L dated June 9, 1988. The proposed Technical Specification changes take credit for the INPO accreditation of the licensed operator and other nuclear power plant personnel training programs, and continued compliance with the requirements of 10 CFR 55 and 50.120 is required regardless of any reference to them within the Technical Specifications. Therefore, the proposed changes do not increase the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed Technical Specification changes are administrative changes to eliminate inconsistencies with the current regulations for qualifications and training programs. The NRC, during the rulemaking

process, has considered any impact that licensed operator qualifications and training programs may have on the possibility of a new or different kind of accident from any accident previously evaluated, and by promulgation of the revised 10 CFR 55 rule, concluded that this impact remains unchanged as long as licensed operator training programs are certified to be accredited and based on a systems approach to training in accordance with GL 87-07. CEI provided such certification for PNPP Unit 1 by letter PY-CEI/NRR-0866L dated June 9, 1988. The proposed Technical Specification changes take credit for the INPO accreditation of the licensed operator and other nuclear power plant personnel training programs, and continued compliance with the requirements of 10 CFR 55 and 50.120 is required regardless of any reference to them within the Technical Specifications. Additionally, the proposed Technical Specification changes do not affect plant design, hardware, system operation, or procedures. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety.

The proposed Technical Specification changes are administrative changes to eliminate inconsistencies with the current regulations applicable to qualifications and training programs. The licensed operator qualifications and training programs will continue to be required to comply with the requirements of 10 CFR 55. The NRC, during the rulemaking process, has considered any impact that licensed operator qualifications and training programs may have on the margin of safety, and by promulgation of the revised 10 CFR 55 rule, determined that this impact remains unchanged when licensees certify that their licensed operator training programs are accredited and based on a systems approach to training in accordance with GL 87-07. CEI provided such certification for PNPP Unit 1 by letter PY-CEI/NRR-0866L dated June 9, 1988. The NRC has concluded, as stated in NUREG-1262, that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. As a result, maintaining INPO accredited systems based licensed operator training programs is equivalent to maintaining NRC approved licensed operator training programs which conform with applicable NRC RGs or NRC endorsed ANSI/ANS standards. The margin of safety is maintained by virtue of maintaining INPO accredited licensed operator and other nuclear power plant personnel training programs and through continued compliance with the requirements of 10 CFR 55 and 50.120. Therefore, the proposed changes do not reduce the margin of safety.