

ATTACHMENT IV

PROPOSED TECHNICAL SPECIFICATION CHANGES

## ADMINISTRATIVE CONTROLS

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### MEETING FREQUENCY

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

### QUORUM

6.5.1.5 The quorum of the PSRC necessary for the performance of the PSRC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

### RESPONSIBILITIES

6.5.1.6 The PSRC shall be responsible for:

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- ~~a. Review of: (1) all procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Vice President Plant Operations to affect nuclear safety;~~
- b. Review of all proposed changes, tests and experiments which may involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- c. Review of all proposed changes to Technical Specifications or the Operating License;
- d. Review of all safety evaluations performed under the provision of Section 50.59(a)(1), 10 CFR, for changes, tests and experiments;
- 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 Vice President Plant Operations, and to the Nuclear Safety Review Committee (NSRC);
- f. Review of all REPORTABLE EVENTS;
- g. Review of reports of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman, NSRC;
- i. ~~Review of the plant Security Plan and implementing procedures and shall submit recommended changes to the NSRC; Not Used~~
- j. ~~Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the NSRC; Not Used~~

Insert A

- a. Review of: (1) Administrative Control Procedures and changes thereto, and (2) procedures and changes thereto required by Specification 6.8.1 and requiring a 10CFR50.59 safety evaluation;

## ADMINISTRATIVE CONTROLS

### RESPONSIBILITIES (Continued)

- k. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL and the Radwaste Treatment Systems, and
- l. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President Plant Operations and to the Nuclear Safety Review Committee.
- m. Review of the Fire Protection Program and shall submit recommended changes to the Nuclear Safety Review Committee.

#### 6.5.1.7 The PSRC shall:

- a. Recommend in writing to the Vice President Plant Operations approval or disapproval of items considered under Specification 6.5.1.6a. through d. and m. above.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6a. through e. above constitutes an unreviewed safety question, and
- c. Provide written notification within 24 hours to the President and Chief Executive Officer and the Nuclear Safety Review Committee of disagreement between the PSRC and the Vice President Plant Operations; however, the Vice President Plant Operations shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.

### RECORDS

6.5.1.8 The PSRC shall maintain written minutes of each PSRC meeting that, at a minimum, document the results of all PSRC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President Plant Operations and the Nuclear Safety Review Committee.

## 6.5.2. NUCLEAR SAFETY REVIEW COMMITTEE (NSRC)

### FUNCTION

6.5.2.1 The NSRC shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,

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### PROCEDURES AND PROGRAMS (Continued)

- e. Process Control Program implementation;
- f. ODCM implementation, and
- g. Quality Assurance Program implementation for effluent and environmental monitoring.
- h. Fire Protection Program implementation.

Major Procedures, supported by appropriate Minor Procedures (such as checkoff lists, operating instructions, data sheets, alarm responses, etc.), shall be provided for the above activities.\* A Major Procedure is a procedure which controls safety-related activities, and establishes one or more basic controls, overall responsibilities, authority assignments or administrative and operational ground rules at the Wolf Creek plant. Major Procedures are written to meet the requirements of ANSI N18.7-1976/ANS 3.2 and generally are supported by Minor Procedures which provide delineation of details such as for valve lineups, calibration procedures, operating instructions, data sheets, alarm responses, and other procedures identified as "supporting." Major Procedures require signature approval in all cases by the Vice President Plant Operations or a Call Superintendent in his absence. A Minor Procedure is a procedure which controls safety-related activities in support of a Major Procedure. It addresses a specific topic or sub-topic established by its 'parent' Major Procedure, expanding on it by providing working level instructions. Minor Procedures are not permitted to contradict requirements contained in their governing Major Procedure. Minor Procedures require signature approval by the Vice President Plant Operations, or a Call Superintendent in his absence, only at Revision '0.'

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##### 6.8.2 Approval of Procedures

- ~~a. All Major Procedures of the categories listed in Specification 6.8.1 and modifications to the intent thereof shall be reviewed by the PSRC and approved by the Vice President Plant Operations prior to implementation and reviewed periodically as set forth in Administrative Procedures.~~
- ~~b. Minor Procedures (checkoff lists, operating instructions, data sheets, alarm responses, chemistry and analytical procedures, technical instructions, special and routine maintenance procedures, laboratory manuals, etc.) shall, prior to initial use, be approved by the PSRC or a Subcommittee thereof.~~
- ~~c. Corporate Emergency Plan implementing procedures shall be reviewed by appropriate corporate and plant personnel and approved by the President and Chief Executive Officer as set forth in General Procedures.~~

~~\*With the exception of Corporate Emergency Plan implementing procedures, Corporate Emergency Plan implementing procedures shall be provided but shall not be designated as major or minor procedures.~~

**Insert B**

6.8.2 Each procedure of Specification 6.8.1 and changes thereto, and any other procedure or procedure change that the Vice President Plant Operations determines to affect nuclear safety, shall be reviewed and approved as described below, prior to implementation.

- a. Each procedure, or change thereto shall be reviewed by a Qualified Reviewer who is knowledgeable in the functional area affected, but is not the individual who prepared the procedure or procedure change. All required cross-disciplinary reviews of new procedures, procedure revisions or changes thereto shall be completed prior to approval.
- b. Procedures other than Administrative Control Procedures shall be approved by the responsible Manager or his designee as specified in Administrative Control Procedures. The Vice President Plant Operations shall approve Administrative Control Procedures. The Manager responsible for the Security Plan shall approve the Security Plan and implementing procedures. The Manager responsible for Emergency Planning shall approve the Radiological Emergency Response Plan and implementing procedures.
- c. The responsible Manager or his designee shall ensure each review includes a determination of whether a procedure, or change thereto, requires a 10CFR50.59 safety evaluation. If a procedure, or change thereto, requires a 10CFR50.59 safety evaluation, the responsible Manager or his designee shall forward the procedure, or change thereto with the associated 10CFR50.59 safety evaluation to the PSRC for review in accordance with Specification 6.5.1.6.a. Pursuant to Section 50.59, 10 CFR, NRC approval of items involving unreviewed safety questions shall be obtained prior to approval for implementation.
- d. Qualified Reviewers shall meet the applicable qualifications of ANSI/ANS 3.1-1978. Personnel recommended to be Qualified Reviewers shall be reviewed by the PSRC and approved and documented by the PSRC Chairman. The responsible Manager shall ensure that a sufficient complement of Qualified Reviewers for their functional area is maintained in accordance with Administrative Control Procedures.
- e. Records documenting the activities performed under Specification 6.8.2.a. through 6.8.2.d., shall be maintained in accordance with Specification 6.10.

## ADMINISTRATIVE CONTROLS

### PROCEDURES AND PROGRAMS (Continued)

#### 6.8.3 Changes to Procedures

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a. Temporary changes to Major Procedures, of the categories listed in Specification 6.8.1 which do not change the intent or generate an unreviewed safety question of the original or subsequent approved procedure, may be made provided such changes to operating procedures are approved by the Shift Supervisor (SRO licensed) and one of the Call Superintendents for temporary changes to Major Procedures under the jurisdiction of groups other than Operations (e.g., Maintenance, Instrumentation and Control, Reactor Engineering, Chemistry, Health Physics) which do not change the intent or generate an unreviewed safety question, changes may be made upon approval of the Cognizant Group Leader and a Call Superintendent.

All temporary changes to Major Procedures (made by a Call Superintendent and either a Cognizant Group Leader or the Shift Supervisor) shall subsequently be reviewed by the PSRC and approved by the Vice President Plant Operations within 14 days, except that temporary changes to Major Procedures made during a refueling outage may be reviewed and approved at any time prior to initial criticality of the reload core. All permanent changes to Major Procedures shall be made in accordance with Specification 6.8.2.a.

b. All temporary or permanent changes to Minor Operating Procedures (checkoff lists, alarm responses, data sheets, operating instructions, etc.) shall be approved by the Shift Supervisor and shall be subsequently reviewed and approved by the Operations PSRC Subcommittee. All temporary or permanent changes to other Minor Procedures under the jurisdiction of groups other than Operations (e.g., Maintenance, Instrumentation and Control, Reactor Engineering, Chemistry, Health Physics) shall be approved by a Cognizant Group Leader and shall be subsequently reviewed and approved by the appropriate PSRC Subcommittee.

c. Temporary changes to Corporate Emergency Plan implementing procedures may be made provided that: (1) the intent of the original procedure is not altered, (2) the change is approved by the Manager Technical Services, and (3) the change is documented, reviewed by appropriate Corporate and plant personnel and approved by the President and Chief Executive Officer within 14 days of the implementation.

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

#### a. Reactor 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 appropriate portions of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, RHR System, and the Nuclear Sampling System (PASS only). The program shall include the following:



Insert C

6.8.3 Temporary changes to procedures specified in 6.8.1 above may be made and implemented prior to obtaining the review and approval required in 6.8.2 above provided:

- a. The intent of the original procedure is not altered;
- b. Temporary changes shall, as a minimum, be approved by two cognizant members of the WCNO staff knowledgeable in the areas affected by the procedure. At least one of these shall be a member of WCNO supervision. Changes to operations procedures shall be approved by two cognizant members of WCNO staff knowledgeable in the areas affected by the procedure. One will hold a senior reactor operator license on the unit.
- c. The change is documented, reviewed and approved as required by 6.8.2, within 14 days of implementation.