

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES

RELATED TO

MANAGEMENT ORGANIZATION

AND

TITLES

POWER AUTHORITY OF THE STATE OF NEW YORK  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT  
DOCKET NO. 50-333  
DPR-59

Administrative Controls are the means by which plant operations are subject to management control. Measures specified in this section provide for the assignment of responsibilities, plant organization, staffing qualifications and related requirements, review and audit mechanisms, procedural controls and reporting requirements. Each of these measures are necessary to ensure safe and efficient facility operation.

#### 6.1 RESPONSIBILITY

The Resident Manager is responsible for safe operation of the plant. During periods when the Resident Manager is unavailable, the Superintendent of Power will assume his responsibilities. In the event both are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel. The Resident Manager reports directly to the Executive Vice President-Nuclear Generation, as shown in Fig. 6.1-1.

#### 6.2 PLANT STAFF ORGANIZATION

The plant staff organization is shown graphically in Fig. 6.2-1 and functions as follows:

1. A licensed senior reactor operator shall be onsite at all times when there is fuel in the reactor.
2. In addition to item 1 above, a licensed reactor operator shall be in the control room at all times when there is fuel in the reactor.
3. In addition to items 1 & 2 above, a licensed reactor operator shall be readily available on site whenever the reactor is in other than cold condition.
4. Two licensed reactor operators shall be in the control room during start-ups and scheduled shutdowns.
5. A licensed senior reactor operator shall be responsible for all movement of new and irradiated fuel within the site boundary. A licensed reactor operator will be required to manipulate or directly supervise the manipulation of the controls of all fuel moving equipment, except the reactor building crane. All fuel movements by the reactor building crane, except new fuel movements from receipt through dry storage, shall be under the direct supervision of a licensed reactor operator. All fuel movements within the core shall be directly monitored by a member of the reactor analyst group. (a)

8. Review the Emergency Plan and implementing procedures annually.
9. Perform special review and/or investigations at the request of the Resident Manager.
10. Review of those reportable occurrences requiring 24 hour notification to the NRC, in accordance with Specification 6.9.

(F) Authority

The PORC shall function to advise the Resident Manager on all matters related to nuclear safety and environmental operations. The PORC shall recommend approval or disapproval to the Resident Manager of those items considered in 6.5 1E (1) through (4) and determine if items considered in 6.5 1E (1) through (5) constitute unreviewed safety questions, as defined in 10 CFR 50.59.

In the event of a disagreement between the PORC and the Resident Manager, the Chairman of the SRC and the Executive Vice President - Nuclear Generation, or their designated alternates, shall be notified within 24 hours and written notification provided on the next business day; however, the Resident Manager shall have responsibility for resolution of such disagreement pursuant to Section 6.1.

(G) Records

Minutes of all meetings of the PORC shall be recorded and numbered. Copies will be retained in file. Copies will be forwarded to the Chairman of the SRC and the Executive Vice President - Nuclear Generation.

(H) Procedures

Conduct of the PORC and the mechanism for implementation of its responsibilities and authority are defined in the pertinent Administrative Procedures.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The SRC shall collectively have the competence required to review problems in the following areas:

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

- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Nuclear Licensing
- m. Emergency Planning
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant

#### MEMBERSHIP

6.5.2.2 The SRC shall be composed of the following voting members:

Chairman:	Manager-Nuclear Safety Evaluation
Vice-Chairman:	Vice President-Quality Assurance and Reliability
Member:	Vice President Nuclear Support-BWR
Member:	Vice President Nuclear Support-PWR
Member:	Manager Radiological Health and Chemistry
Member:	Director-Nuclear Design and Analysis
Member:	Director-Electrical Design and Analysis
Member:	Director of Environmental Programs
Member:	Director-Civil/Structural Design and Analysis
Member:	Director-Mechanical Design and Analysis
Member:	Director-Piping and Process-Design and Analysis
Member:	Manager Operational Analysis and Training

#### ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the SRC Chairman; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

#### CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

#### MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of facility operation following initial fuel loading and at least once per six months, thereafter.



- 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 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 24 months.
- f. The Facility Security Plan and implementing procedures at least once per 24 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President - Nuclear Generation.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. An independent fire protection and loss of prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

#### AUTHORITY

6.5.2.9 The SRC shall report to and advise the Executive Vice President - Nuclear Generation on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8

#### RECORDS

6.5.2.10 Records will be maintained in accordance with ANSI 18.7-1972. The following shall be prepared, approved and distributed as indicated below:

- a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Executive Vice President - Nuclear Generation within 14 days after the date of the meeting.
- b. Reports of review encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Executive Vice President - Nuclear Generation within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President - Nuclear Generation and to the management positions responsible for the areas audited within 30 days after completion of the audit.

## CHARTER

6.5.2.11 Conduct of the committee will be in accordance with a charter approved by the Executive Vice President - Nuclear Generation setting forth the mechanism for implementation of the committee's responsibilities and authority.

### 6.6 REPORTABLE OCCURRENCE ACTION

(A) In the event of a Reportable Occurrence, the NRC shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.

(B) Each Reportable Occurrence requiring 24 hours notification to the NRC shall be reviewed timely by the PORC and a report submitted by the Resident Manager to the Executive Vice President - Nuclear Generation and the SRC.

### 6.7 SAFETY LIMIT VIOLATION

(A) If a safety limit is exceeded, the reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36 (c) (i).

(B) An immediate report of each safety limit violation shall be made to the NRC by the Resident Manager. The Executive Vice President - Nuclear Generation and Chairman of the SRC will be notified within 24 hours.

(C) The PORC shall prepare a complete investigative report of each safety limit violation and include appropriate analysis and evaluation of: (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence upon facility component systems or structures and (3) corrective action required to prevent recurrence. The Resident Manager shall forward this report to the Executive Vice President - Nuclear Generation, Chairman of the SRC and the NRC.

### 6.8 PROCEDURES

(A) Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5 "Facility Administrative Policies and Procedures" of ANSI 18.7-1972 and Appendix A of Regulatory Guide 1.33, November 1972. In addition, procedures shall be established, implemented and maintained for the Fire Protection Program.

(B) Those procedures affecting nuclear safety shall be reviewed by PORC and approved by the Resident manager prior to implementation.

(C) Temporary changes to nuclear related procedures may be made provided:

1. The intent of the original procedure is not altered.

## 6.11 (A) High Radiation Area

1. In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each High Radiation Area (i.e.,  $>100$  mrem/hr) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).<sup>\*</sup> Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
  - a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
  - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
  - c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility in the Radiation Work Permit.
2. The requirements of 6.11.A.1 above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Radiological and Environmental Services Superintendent.

<sup>\*</sup>Radiation Protection personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

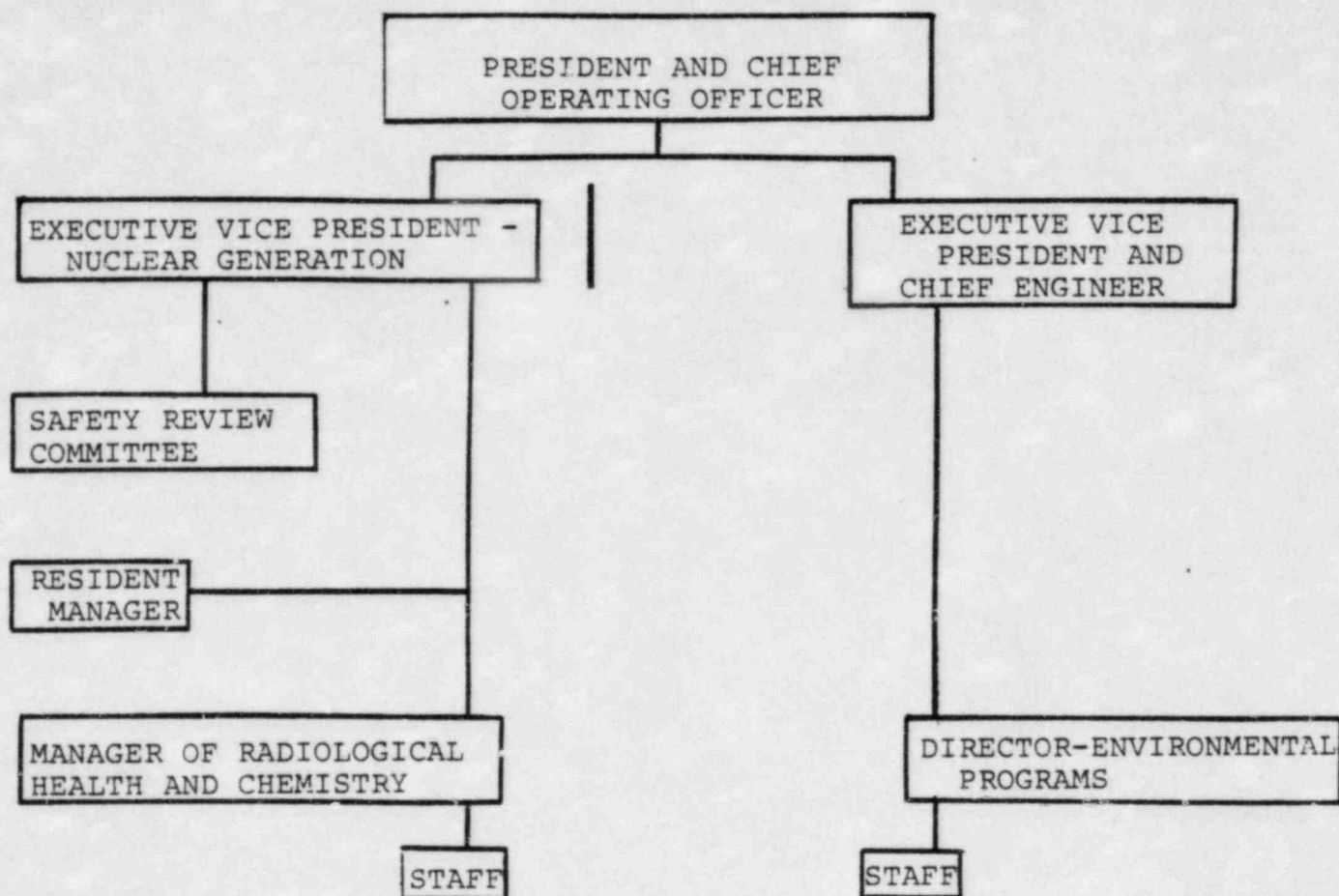
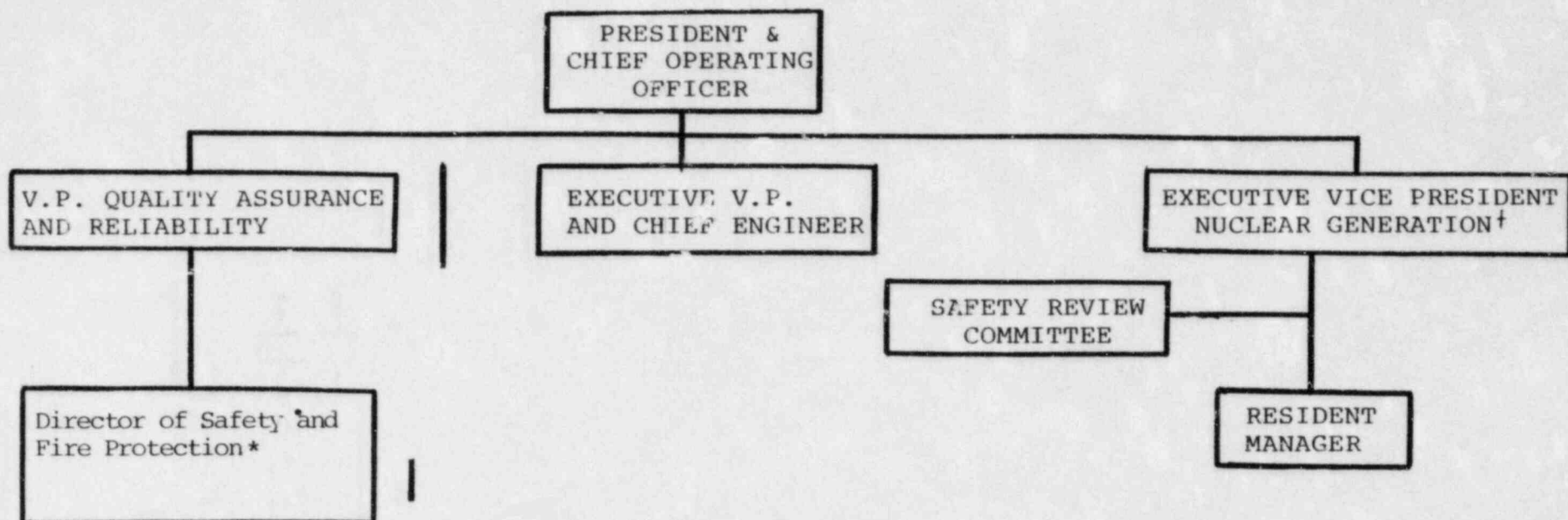


Figure 5.2-2  
Management Organization-Offsite  
Radiological Environmental  
James A. FitzPatrick Nuclear  
Power Plant



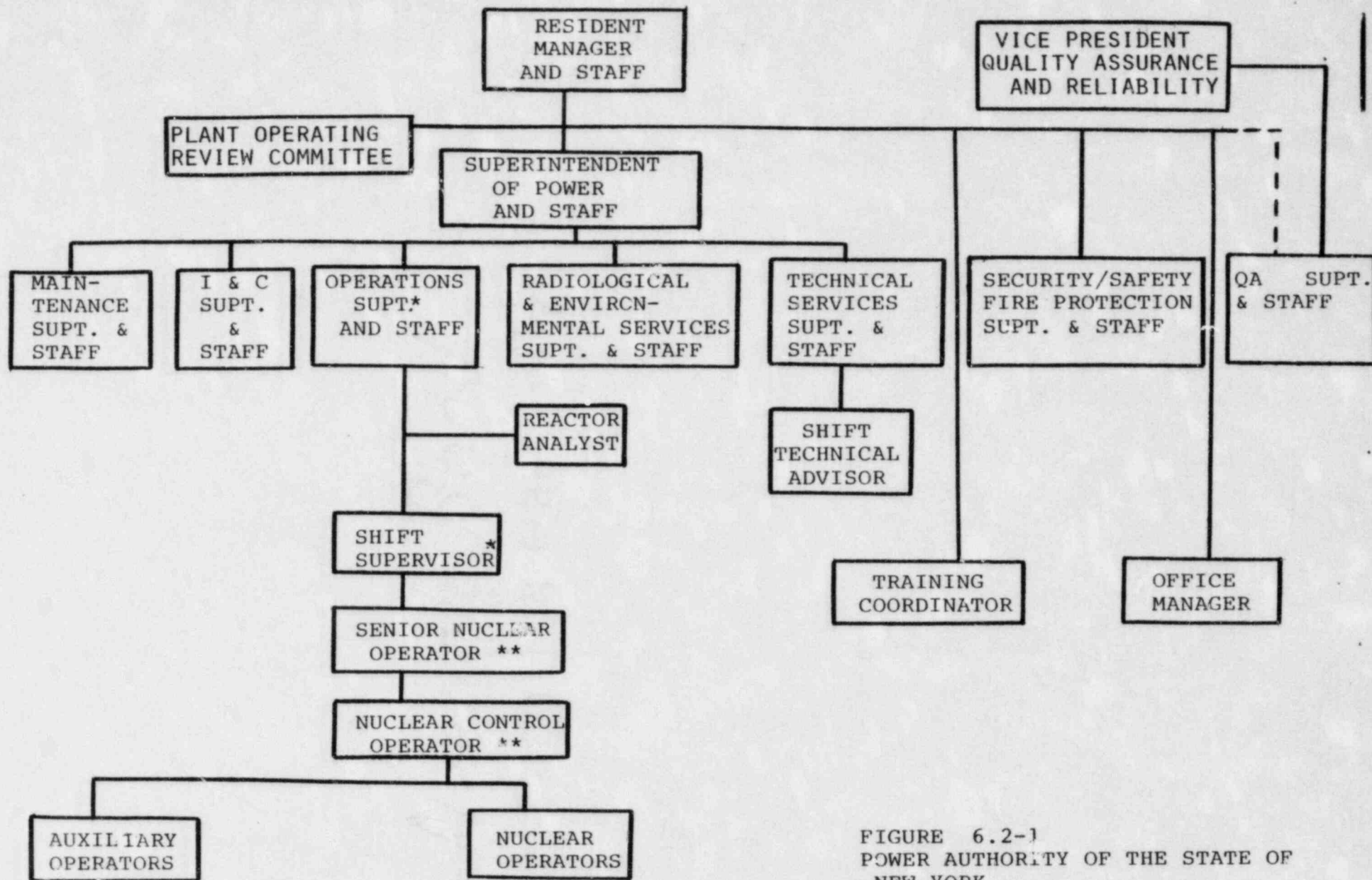


† The Executive Vice President Nuclear Generation is responsible for administering the fire protection program.

\* The Director of the Safety and Fire Protection Division, which is part of the Quality Assurance and Reliability Department, is the off-site management position responsible for assessing the effectiveness of the fire protection programs by conducting reviews and audits.

FIGURE 6.1-1

MANAGEMENT ORGANIZATION CHART  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT



\*SRO - SENIOR REACTOR OPERATOR  
 \*\*RO - REACTOR OPERATOR

FIGURE 6.2-1  
 POWER AUTHORITY OF THE STATE OF  
 NEW YORK  
 JAMES A. FITZPATRICK NUCLEAR POWER  
 PLANT  
 PLANT STAFF ORGANIZATION

ATTACHMENT II

SAFETY EVALUATION

RELATED TO

MANAGEMENT ORGANIZATION

AND

TITLES

POWER AUTHORITY OF THE STATE OF NEW YORK  
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## Section I - Description of the Changes

In Figure 6.1-1 of Appendix A, page 259, "Procedures and Performance" is replaced by "Quality Assurance and Reliability". Also in this figure, the position entitled "Director of Safety and Fire Protection Procedures and Performance" is renamed as "Director of Safety and Fire Protection." The phrase "which is part of the Quality Assurance and Reliability Department," is added to the sentence denoted by an asterisk. Also in this sentence, "Safety and Fire Protection" has been changed to "the Safety and Fire Protection Division".

In Section 6.5.2.2 (page 251) and in Figure 6.2.1 (page 260) of Appendix A, the words "Quality Assurance" are replaced by the words "Quality Assurance and Reliability."

The title of Senior Vice President - Nuclear Generation is changed to Executive Vice President - Nuclear Generation in Appendix B, Figure 5.2-2 (page 44) and in Appendix A, Sections 6.1 (page 247), 6.5.1 F and G (page 250), 6.5.2.8g (page 252a), 6.5.2.9 (page 252a), 6.5.2.10 a through c (page 252a), 6.5.2.11 (page 253), 6.6 B (page 253), and 6.7 B and C (page 253).

Lastly, the "Plant Radiation Protection and Radiochemistry Supervisor" denoted on page 256 is changed to the "Radiological and Environmental Services Superintendent."

## Section II - Purpose of the Changes

Procedures and Performance was a department responsible for audits and appraisals of various activities within the Authority. The following divisions were included under that department.

- 1) Operating Procedures and Performance



- 2) Maintenance Procedures and Performance
- 3) Radiological and Environmental Protection Procedures and Performance
- 4) Training and Administration Procedures and Performance
- 5) Project Construction Procedures and Performance
- 6) Safety and Fire Protection Procedures and Performance
- 7) Quality Assurance

(Those Procedures and Performance divisions performed independent appraisals of the divisions which conducted the actual functional activities of operations, maintenance, radiological and environmental protection, safety and fire protection, training and administration, and project construction.)

The Authority realigned and renamed the Procedures and Performance Department to focus on quality assurance, system reliability, safety and security, and to extend the overall evaluative capabilities of the department. Under the proposed new organization, the department is redesignated as the Quality Assurance and Reliability Department.

"Quality Assurance" itself is comprised of systematic actions (including management direction and appraisals) necessary to provide confidence that systems, components and personnel are performing satisfactorily. "Reliability" focuses on the regularity, efficiency and predictability with which they perform.

Thus, the new title of the department better expresses the actual functions which that department had in fact been performing. In addition, the new title correctly expresses the strengthened focus and purpose of the department, which is to provide guidance and perform audits and appraisals of the applicable divisions.

With the proposed changes, none of the day-to-day functions formerly performed by the Procedures and Performance Department are discontinued or changed. The realignment of divisions under the new Department of Quality Assurance and Reliability is as follows:

- 1) Operational Appraisal (which incorporates the responsibilities of the prior Operating Procedures and Performance Division and the Maintenance Procedures and Performance Division)
- 2) Radiological and Environmental Appraisal
- 3) Training and Administration Appraisal
- 4) Project Appraisal (which has the identical responsibilities of the prior Project Construction Procedures and Performance Division, but which better describes its functions)
- 5) Safety and Fire Protection
- 6) Quality Assurance
- 7) Security

The seventh division, Security, was added to the jurisdiction of the Quality Assurance and Reliability Department to maintain consistency in the overall evaluative responsibilities of the Department. The functions performed by the Director of Security, who formerly reported to the President, include those of auditing and appraising site security operations. Under the proposed realignment, the Director of Security reports to the Vice President - of Quality Assurance and Reliability, who in turn reports directly to the President.

Hence, the proposed changes consolidate, under Quality Assurance and Reliability, the Authority personnel who perform auditing and appraisal tasks. However, the daily duties and management of the individual divisions in the Quality Assurance and Reliability Department, including the Security Division and the Quality Assurance Division, are still accomplished independently. The functions performed by the office of the Director of Security remain identical to those of past security operations.

The above changes are an indication of the Authority's support for quality assurance and of its commitment to strengthen administrative and managerial controls throughout the organization, whether or not they are related to nuclear safety.

The change of Senior Vice President - Nuclear Generation to Executive Vice President - Nuclear Generation is a title change only, and does not otherwise impact the organization. The change elevates the title of the senior executive position in the Nuclear Generation Department to a level commensurate with the authority and overall responsibilities of the position.

Lastly, the change of the Plant Radiation Protection and Radiochemistry Supervisor to Radiological and Environmental Services Superintendent is a correction which was inadvertently overlooked in a prior technical specification change included with Amendment No. 60, August 31, 1981 (application filed June 15, 1982, JPN-81-42). In that amendment, the above title change was approved by the Commission.

### Section III - Implementation of the Changes

The changes, as proposed, do not adversely impact the ALARA or Fire Protection programs at FitzPatrick, nor do they impact the environment. The site Security Division and the site Quality Assurance Division maintain their independence from the plant organization.

### Section IV - Conclusion

The incorporation of these changes: a) will not increase the probability or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility of an accident or malfunction of a type other than that evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the basis for any technical specification; and d) does not constitute an unreviewed safety question.

### Section V - References

1. James A. FitzPatrick FSAR, Section 13.2.1.3.2 (Procedures and Performance Department) and Section 13.2.1.3.3 (Security).
2. James A. FitzPatrick Facility Operating License; Appendix A (Technical Specifications), Section 6.1 (Responsibility), Section 6.2 (Plant Staff Organization); Appendix B (Environmental Technical Specifications), Section 5.2 (Administrative Controls - Organization)
3. Exhibits to Application for Amendment to Operating License dated December 20, 1976 and subsequently approved by the NRC as Amendment No. 22 to the Operating License for James A. FitzPatrick Facility.
4. "Proposed Changes to the Technical Specifications Regarding Management Organization Structure," and JPN-82-48, dated June 4, 1982