

ATTACHMENT

DRAFT Composite for
Fort St. Vrain Technical Specification
Section AC 7.1

7.1 ORGANIZATION, REVIEW, AND AUDIT-ADMINISTRATIVE CONTROLS

Applicability

Applies to the lines of authority and responsibility for the operational safety of the facility, and the organization for periodic review and audit of facility operation.

Objectives

To define the principal lines of authority and responsibility for providing continuing review, evaluation, and improvement of the plant operational safety.

SPECIFICATION AC 7.1.1 - ORGANIZATION, ADMINISTRATIVE CONTROLS

1. ORGANIZATION

The organization and lines of responsibility which govern plant operation shall be as follows:

- a. In all matters pertaining to operation and maintenance of the plant and to these Technical Specifications, the Station Manager shall report to, and be directly responsible to, the Manager, Nuclear Production. The Administrative and Departmental Management Organization is shown in Figure 7.1-1.

- b. The Station Manager is directly responsible for overall facility operation and in all matters concerning the Plant Operations Review Committee (PORC). He shall delegate in writing this responsibility during his absence.
- c. The Technical Advisors shall report to, and be directly responsible to, the Technical/Administrative Services Manager. The Technical Advisors shall maintain independence from normal plant operations as necessary to make objective evaluations of plant conditions and to advise or assist plant management in correcting conditions that may compromise safety of operations. The Technical Advisors are responsible for:
 - (1) Maximizing plant safety during and after accidents, transients, and emergencies by independently assessing plant conditions and by providing technical assistance to mitigate and minimize the effects of such incidents and make recommendations to the Superintendent of Operations.

- (2) Review abnormal and emergency procedures.
 - (3) Assist the operations staff in applying the requirements of the Technical Specifications.
 - (4) Provide evaluation of Licensee Event Reports from other plants as assigned.
- d. Organization for conduct of operations of the plant is shown in Figure 7.1-2.

2. UNIT STAFF

The unit staff shall be as shown on Table 7.1-1 and:

- a. A licensed senior operator shall be present on site at all times when there is fuel in the reactor.
- b. A licensed operator must be in the Control Room at all times when fuel is in the reactor. During reactor startup, shutdown, and recovery from reactor trip, two licensed operators must be in the Control Room.
- c. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to Fuel Handling who has no other concurrent responsibilities during this operation.

- d. An operator or technician qualified in radiation protection procedures shall be present at the facility at all times that there is fuel on site.
- e. A site Fire Brigade of at least five members shall be maintained on site at all times*. The Fire Brigade shall not include (3) members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

*Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accomodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.

- f. The Technical Advisor shall be in the Control Room within one hour after an emergency call. The Technical Advisors shall work on a normal day work schedule, but will be placed "on call" after normal working hours.

- g. Upon commencement of commercial operation, the staffing of the plant shall be in accordance with American National Standards Institute N18.1-1971, "Select on and Training of Personnel for Nuclear Power Plants."
- h. Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975.
- i. Members of the plant staff who perform safety-related functions (e.g., Senior Reactor Operators, Reactor Operators, Auxiliary Operators, Health Physicists, and key maintenance personnel) should, to the extent practicable, work an eight-hour day, 40-hour week, while the plant is operating. In the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

- (1) An individual should not be permitted to work more than 16 hours straight (excluding shift turnover time).
- (2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven-day period (all excluding shift turnover time).
- (3) A break of at least eight hours should be allowed between work periods (including shift turnover time).
- (4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on shift.

If unusual circumstances arise requiring deviation from the above guidelines, such deviation shall be authorized by the Station Manager or his designee, or higher levels of management. The paramount consideration in such authorization shall be that significant reductions in the effectiveness of operating personnel would be highly unlikely.

Authorized deviations to the working hour guidelines shall be documented and available for Nuclear Regulatory Commission review.

3. TRAINING

- a. A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10CFR Part 55. Compliance with Section 5.5 of ANSI 18.1-1971 shall be achieved no later than six months following commencement of commercial operation.
- b. A training program for the Fire Brigade shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements of Section 27 of the NFFA Code-1975, except for Fire Brigade training/drill sessions which shall be held at least once per calendar quarter.
- c. The Technical Advisors shall have a bachelor degree or equivalent in a scientific or engineering

discipline with specific training in plant design and response and analysis of the plant for transients and accidents. An initial training and retraining program for the Technical Advisors shall be maintained under the direction of the Training Supervisor. The Technical Advisors shall also receive training in plant design and layout, including the capabilities of instrumentation in the Control Room.

SPECIFICATION AC 7.1.2 - PLANT OPERATIONS REVIEW COMMITTEE (PORC), ADMINISTRATIVE CONTROLS

The organization, responsibilities, and authority of the PORC shall be as follows:

1. MEMBERSHIP

The Plant Operations Review Committee shall be composed of the following:

Chairman: Station Manager
Technical/Administrative Services Manager
Radiation Protection Manager
Superintendent of Operations
Superintendent of Maintenance
Health Physics Supervisor

Results Engineering Supervisor
Shift Supervisor
Training Supervisor
Maintenance QC Supervisor
Scheduling/Stores Coordinator
Technical Services Engineering Supervisor
Senior Maintenance Supervisor
Maintenance Supervisor
Security Supervisor
Reactor Engineer
Technical Services Engineer
Technical Advisors
Training Instructor

2. ALTERNATES

An alternate chairman and alternate members, if required, shall be appointed in writing by the PORC Chairman to serve in the absence of a chairman or a member; however, no more than two alternate members shall participate in PORC activities at any one time.

3. MEETING FREQUENCY

The PORC shall meet at least once per calendar month and as convened by the Chairman.

4. QUORUM

A quorum shall consist of the Chairman or alternate Chairman, and four members including alternates.

5. RESPONSIBILITIES

The PORC shall be responsible for:

- a. Review of all procedures required by Technical Specification 7.4(a), (b), and (c) and changes thereto, and any other proposed procedure or changes to approved procedures as determined by the Station Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering the evaluation and recommendations to prevent recurrence to the

SPECIFICATION AC 7.1.3 - NUCLEAR FACILITY SAFETY COMMITTEE
(NFSC), ADMINISTRATIVE CONTROLS

The organization, responsibilities, and authority of the NFSC shall be as follows:

1. FUNCTION

The Nuclear Facility Safety Committee 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
- g. Mechanical and Electrical Engineering
- h. Quality Assurance Practices
- i. (Other appropriate fields associated with the unique characteristics of the nuclear power plant.)

2. MEMBERSHIP

The NFSC shall be composed of the following:

Chairman: Vice President, Electric Production
Manager, Nuclear Production Division

Manager, Nuclear Engineering Division

Quality Assurance Manager

Manager, Risk Management

Consultants, as required and appointed by the
Chairman

3. ALTERNATES

An alternate chairman and alternate members, if required, shall be appointed in writing by the Chairman; however, no more than two alternate members shall participate in NFSC activities at any one time.

4. CONSULTANTS

Consultants shall be utilized as determined by the Chairman, NFSC, to provide expert advice to the NFSC.

5. MEETING FREQUENCY

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

6. QUORUM

A quorum of the NFSC shall consist of the Chairman or his designated alternate and a majority of the NFSC

members including alternates. No more than a minority of the quorum shall have line responsibilities for operation of the facility.

7. RESPONSIBILITIES

a. The Nuclear Facility Safety Committee shall review:

- (1) The safety evaluations for changes to procedures, equipment, or systems affecting nuclear safety and tests or experiments affecting nuclear safety completed under the provision of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question.
- (2) Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- (3) Proposed tests or experiments which involve an unreviewed safety question, as defined in Section 50.59, 10CFR.
- (4) Proposed changes in Technical Specifications or licenses.

- (5) Violation of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions affecting nuclear safety.
 - (6) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
 - (7) All events which are required by regulations or Technical Specifications to be reported to the NRC in writing within 24 hours.
 - (8) Any indication that there may be a deficiency in some aspect of design or operation of structures, systems, or components, that affect nuclear safety.
 - (9) Reports and meeting minutes of the PORC.
- b. Audits of facility activities shall be performed under the cognizance of the Nuclear Facility Safety Committee. These audits shall encompass:

- (1) The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- (2) The performance, training, and qualifications, of the facility staff at least once per year.
- (3) 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 six months.
- (4) The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10CFR50, at least once per two years.
- (5) The facility Emergency Plan and implementing procedures at least once per two years.
- (6) The facility Security Plan and implementing procedures at least once per two years.
- (7) Any other area of facility operation considered appropriate by the NFSC.

- (8) An audit of the Fire Protection Program including a fire protection and loss prevention inspection shall be performed annually, utilizing qualified off site licensee personnel, an outside fire protection firm, or an outside qualified fire consultant. This audit must be performed by an outside qualified fire consultant at intervals no greater than three years.

8. AUTHORITY

The NFSC shall report to and advise the Vice President, Electric Production on those areas of responsibility specified in b.(7) above.

9. RECORDS

Records of NFSC activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NFSC meeting shall be prepared, approved, and forwarded to the Vice President, Electric Production within 30 days following each meeting.
- b. Reports of reviews encompassed by Section 7.a, above shall be forwarded to the Vice President,

Electric Production within 30 days following completion of the review.

- c. Audit reports encompassed by Section 7.b, above shall be forwarded to the Vice President, Electric Production and to the management positions responsible for the areas audited within 30 days after completion of the audit.

TABLE 7.1-1
MINIMUM SHIFT CREW COMPOSITION

Position	Number of Individuals Required to Fill Position	
	During Hot, Cold, or Refueling Shutdown (a)	All Other Conditions
SS (SRO)	1	1
SRO	Not Required	1
RO	1	2 (b)
EO	1	1
AT	Not Required	1
TA (c)	1	1

SS - Shift Supervisor with a Senior Reactor Operator's License
 SRO - Individual with a Senior Reactor Operator's License
 RO - Individual with a Reactor Operator's License
 EO - Equipment Operator
 AT - Auxiliary Tender
 TA - Technical Advisor

In addition to the requirements of Section 7.1.1(2), the following apply:

During hot shutdown, cold shutdown, or refueling shutdown conditions, an individual (other than the Technical Advisor) with a valid RO (or SRO) license shall be present in the Control Room.

During all other conditions, an individual (other than the Technical Advisor) with a valid SRO license shall be present in the Control Room.

Except for the Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 7.1-1 for a period of time not to exceed two hours in order to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 7.1-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent. This provision also does not exclude the requirement for an SRO licensed individual to be in the Control Room at all times other than the shutdown conditions specified in Table 7.1-1.

NOTES: (a) Per Technical Specification definitions, Section 2.0.

(b) One of these two Reactor Operators may be an Equipment Operator with a valid RO license.

(c) The Technical Advisor shall be scheduled as required by Specification 7.1.1(2)(f).

FORT ST. VRAIN NUCLEAR GENERATING STATION
ADMINISTRATIVE AND DEPARTMENTAL MANAGEMENT ORGANIZATION CHART

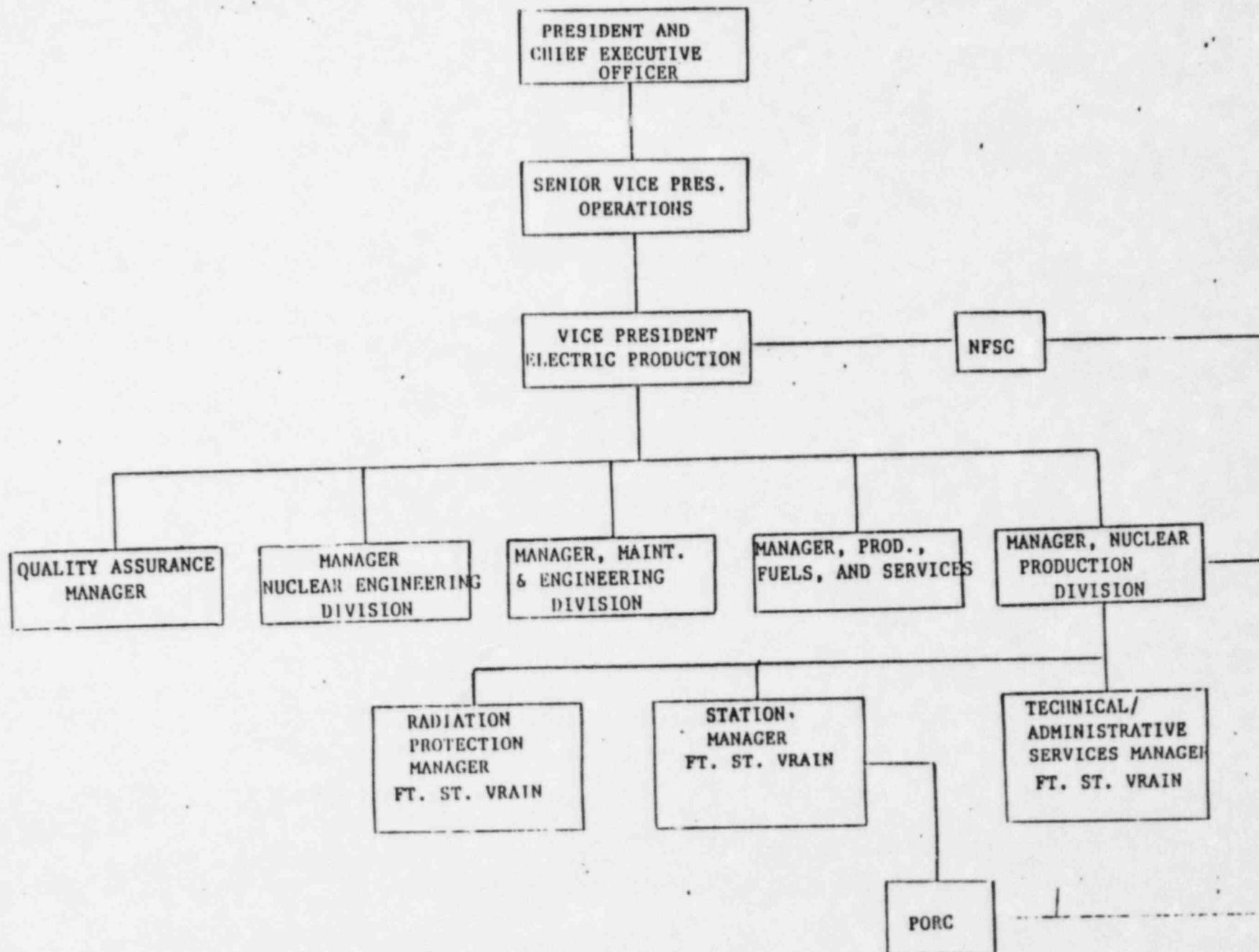
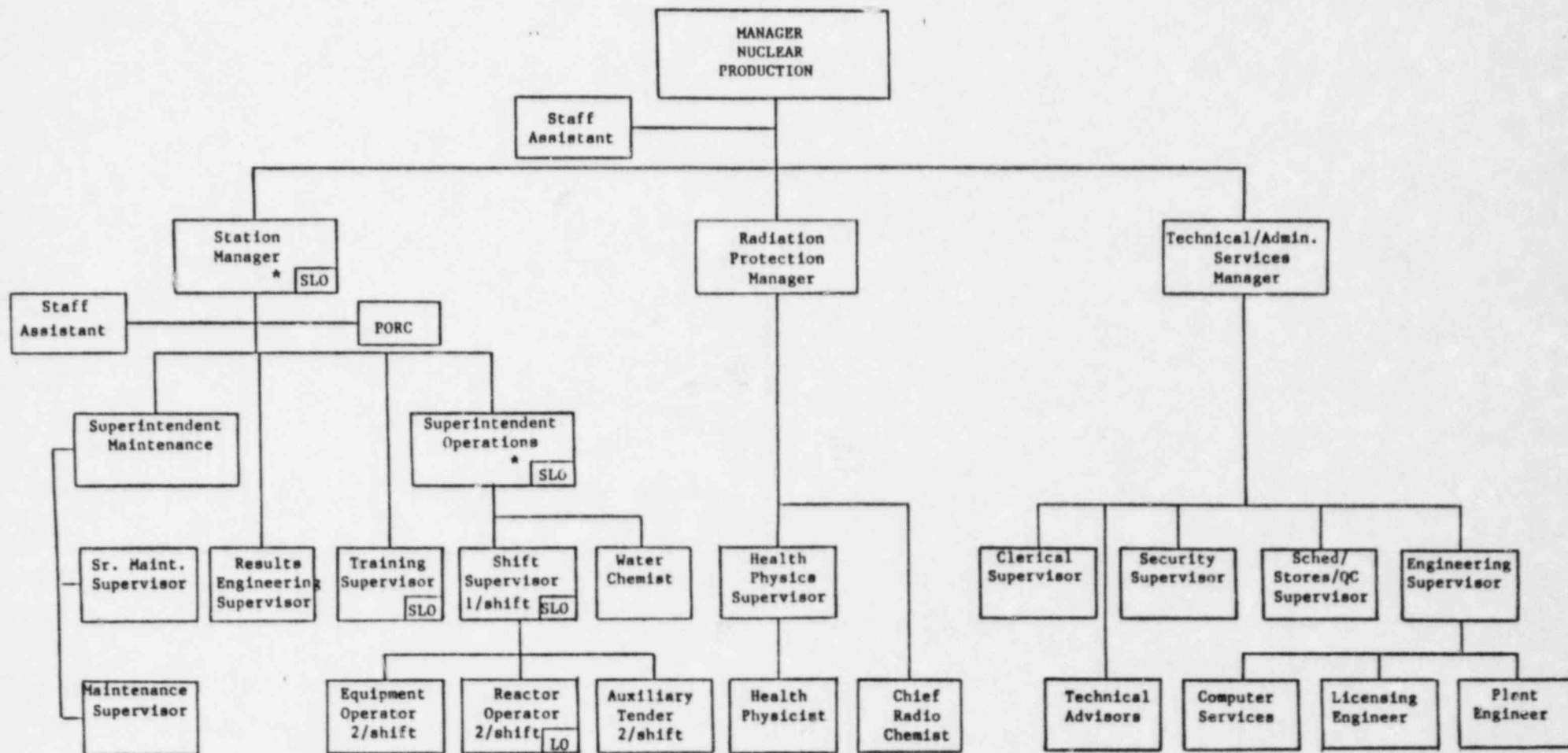


FIGURE 7.1-1

PORT ST. VRAIN NUCLEAR GENERATING STATION
CONDUCT OF OPERATIONS CHART



* Either the Station Manager or the Superintendent of Operations shall possess a senior license.

FIGURE 7.1-2

PORC - Plant Operations Review Committee
SLO - Senior Licensed Operator
LO - Licensed Operator

- c. Render determinations in writing with regard to whether or not each item considered under 5.a through 5.3 above constitutes an unreviewed safety question.
- d. Provide immediate written notification to the Manager, Nuclear Production and the Chairman of NFSC of disagreement between the PORC and the Station Manager; however, the Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.a above.

7. RECORDS

The PORC shall maintain written minutes of each meeting and copies shall be provided to the Manager, Nuclear Production and Chairman of the Fort St. Vrain Nuclear Facility Safety Committee.

Manager, Nuclear Production and to the Chairman of the Nuclear Facility Safety Committee.

- f. Review of events requiring 24-hour notification to the Commission.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations, and reports thereon as requested by the Chairman of the Nuclear Facility Safety Committee.
- i. Review of the Plant Security Plan and implementing procedures and submittal of recommended changes to the Chairman of the Fort St. Vrain Security Committee.

6. AUTHORITY

The PORC shall:

- a. Function to advise the Manager, Nuclear Production on all matters that affect nuclear safety.
- b. Recommend to the Manager, Nuclear Production in writing, approval or disapproval of items considered under 5.a through 5.d, above.