

TECHNICAL SPECIFICATION CHANGE REQUEST NO. 103

TITLE: SECTION 6: ADMINISTRATIVE CONTROLS

Replace pages 6-2, 6-3, 6-5, 6-6, 6-8, 6-9, 6-10, 6-11, 6-12, 6-12a and 6-15 of Appendix A with the attached corresponding revised pages.

PROPOSED CHANGES

- 1) On page 6-2: Change Figure 6.2-1 to indicate the present corporate organizational structure.
- 2) On page 6-3: Revise Figure 6.2-2 to show the general responsibilities of each department rather than every position in each department.
- 3) On page 6-5: In T.S. 6.4 change "Nuclear Plant Training Manager" and "Nuclear Plant Manager" to "Director, Site Nuclear Operations." In T.S. 6.5.1.2 update the PRC member's title to their current titles. Add an additional two "At Large" members to the list of Plant Review Committee (PRC) members in T.S. 6.5.1.2.
- 4) Page 6-6: In T.S. 6.5.1.6.e change "preparation and forwarding of reports" to "review of reports".
- 5) On page 6-8: Add to T.S. 6.5.2.3 "or the equivalent" after "Bachelor of Science in Engineering or related field" in both parts a. and b.
- 6) On page 6-9: In T.S. 6.5.2.8 change Nuclear General Review Committee (NGRC) review requirements to be:
 - a. Safety evaluations of changes to the facility, changes in procedures and tests and experiments not described in the Final Safety Analysis Report which were completed without prior NRC approval.
 - b. Proposed changes in the facility, changes in procedures or proposed tests or experiments which may involve an unreviewed safety question.
 - c. Changes in the Technical Specifications or license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change.
 - d. Violations, deviations and reportable events, which require reporting to the Nuclear Regulatory Commission in writing within 24 hours. This review should include results of investigations and recommendations resulting from such investigations.
 - e. Any other matter involving safe operation of the plant which an independent reviewer deems appropriate for consideration, or which is

referred to the reviewers by members of Nuclear Operations staff or by other functional organizational units within Florida Power Corporation.

- f. Reports and meeting minutes of the Plant Review Committee.
- 7) On page 6-10: In T.S. 6.5.2.9. under items e, f, and g replace "24 months" with "12 months".
- 8) On pages 6-12 and 6-12a: Change the organization of T.S. 6.8 so that 6.8.1 has the heading "Scope" and 6.8.2 has the heading "Review Process". Change 6.8.2 to 6.8.2.1, 6.8.2.c to 6.8.2.2, and 6.8.2.d to 6.8.2.3. Also revise T.S. 6.8.2.a to read:
- a. The Emergency Plan, Security Plan, Fire Protection Plan and implementing procedures, Administrative Instructions and those test procedures associated with safety related plant modifications shall be reviewed by the PRC and approved by the Nuclear Plant Manager prior to implementation.
- 9) On page 6-15, update T.S. 6.9.16 to specify the correct address:

Director, Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

REASONS FOR PROPOSED CHANGES

By and large, most of the proposed changes to Section 6 of Florida Power Corporation (FPC) Technical Specification will update or clarify the current FPC position on the affected Specification. A more detailed breakdown of the reasons for the proposed changes follows.

The new Figures 6.2-1, Corporate Organization, and 6.2-2, Facility Organization, will update T.S. 6.2.1 and T.S. 6.2.2 to agree with the present organization. Moreover, listing departmental responsibilities on Fig. 6.2-2, rather than the positions within each department, will help clarify the responsibilities of each group and interdepartmental relationships. This may also reduce the frequency of changing this organization chart.

The transfer of training direction from the Nuclear Plant Manager and Nuclear Plant Training Manager to the Director, Site Nuclear Operations will update T.S. 6.4 to concur with present management structure.

The changes in T.S. 6.5.1.2 reflects PRC members' title revision. The addition of two more "At Large" PRC members will allow FPC to have more voting attendees available for PRC meetings including on-site non-plant areas.

Changing PRC responsibility to review of Technical Specification violations will clarify the PRC's role in the submittal process of Technical Specification Violations.

The proposed NGRC membership qualifications in T.S. 6.5.2.3 will allow FPC to equate adequate experience to a degree. By doing this otherwise highly qualified individuals will not be excluded from NGRC membership.

The proposed change to T.S. 6.5.2.8 will update the PRC review requirements to concur with Standard Technical Specifications and ANSI N18.7, Administrative Controls and Quality Assurance of Nuclear Power Plants.

The proposed change to T.S. 6.5.2.9. will revise the Emergency Plan, Security Plan and Fire Protection Plan auditing frequency from 24 months to 12 months as required by 10 CFR 73.40(d).

The revision of T.S. 6.8 Procedures will help to clarify the scope and reviewing process of FPC procedures.

SAFETY ANALYSIS OF PROPOSED CHANGES

Most of the proposed changes will clarify or update current administrative positions and policies and as such will not degrade plant safety.

Expanding the Plant Review Committee membership to include two additional "At Large" members will permit a wider variety of expertise on the PRC, thus increasing the quality of the review. Assurance of representation from all essential disciplines will be provided via the PRC Charter.

PRC review of Violation reports will continue to assure that proper evaluations and recommendations concerning these violations are performed.

Substantial expertise exists within the corporation with a large number of non-degreed individuals. To include these non-degreed individuals in the NGRC will potentially increase the effectiveness and quality of this committee.

The changes of Emergency Plan, Security Plan and Fire Protection program audits to 12 months is required by 10 CFR 73.40 (d).

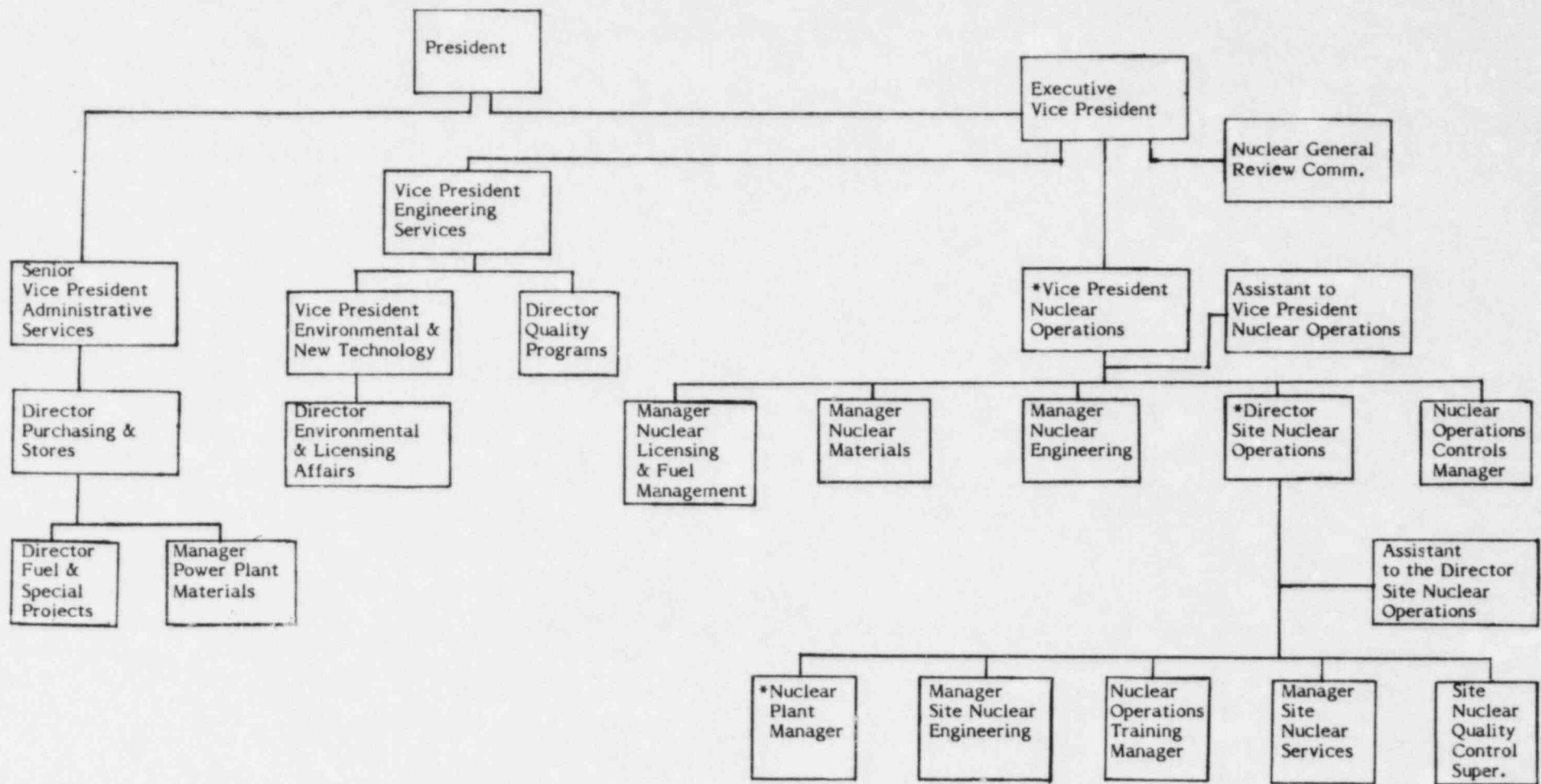
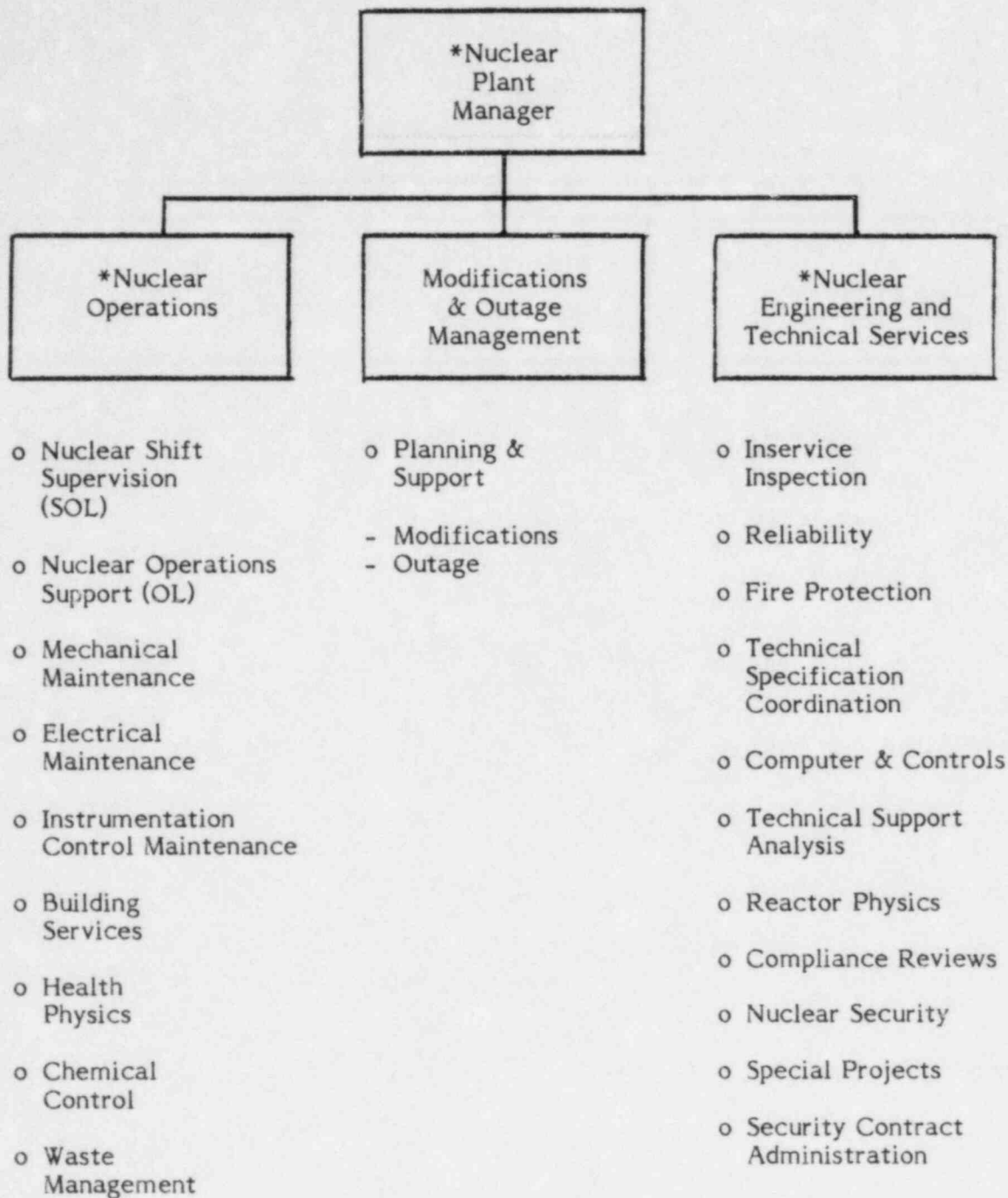


FIGURE 6.2-1
CORPORATE ORGANIZATION

*Indicates position having fire protection responsibility.



Legend: SOL - Senior Operator License
 OL - Operator License
 * - Fire Protection Responsibilities

Figure 6.2.2 FACILITY ORGANIZATION

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6.3 FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Chemistry and Radiation Protection Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Operations Technical Advisor, who shall have a Bachelor's degree, or the equivalent, in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Director, Site Nuclear Operations 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.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Director, Site Nuclear Operations and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976, except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

FUNCTION

- 6.5.1.1 The Plant Review Committee shall function to advise the Nuclear Plant Manager on all matters related to nuclear safety.

COMPOSITION

- 6.5.1.2 The Plant Review Committee shall be composed of the:

Chairman: Nuclear Plant Operations Superintendent
Member: Nuclear Maintenance Superintendent
Member: Nuclear Security and Special Projects Superintendent
Member: Nuclear Compliance Manager
Member: Nuclear Chem/Rad Protection Superintendent
Member: Nuclear Plant Engineering Superintendent
Member: Nuclear Safety & Reliability Superintendent
Member: At Large (Designated by Chairman)
Member: At Large (Designated by Chairman)
Member: At Large (Designated by Chairman)
Member: At Large (Designated by Chairman)

ALTERNATES

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

MEETING FREQUENCY

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

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QUORUM

- 6.5.1.5 A quorum of the PRC shall consist of the Chairman or his designated alternate and five members including alternates.

RESPONSIBILITIES

- 6.5.1.6 The Plant Review Committee shall be responsible for:
- a. Review of 1) all procedures and changes thereto as required by Specification 6.8.2, 2) any other proposed procedures or changes thereto as determined by the Nuclear Plant 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 Appendix "A" 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 review of reports covering evaluation and recommendations to prevent recurrence to the Vice President, Nuclear Operations and to the Chairman of the Nuclear General Review Committee.
 - f. Review of events requiring 24-hour written notification to the Commission.
 - g. Review of facility operations to detect potential nuclear safety hazards.
 - h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Nuclear General Review Committee.
 - i. Review of the Plant Security Plan and implementing procedures.
 - j. Review of the Emergency Plan and implementing procedures.

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COMPOSITION

- 6.5.2.2 The NGRC shall be composed of the Chairman, Vice Chairman, and at least 5 members. No more than a minority of the members shall have line responsibility for operation of the facility. The committee shall collectively have the experience and competence required to review problems in the following areas:
- a. Nuclear power plant operations
 - b. Nuclear engineering
 - c. Chemistry and radiochemistry
 - d. Metallurgy
 - e. Nondestructive testing
 - f. Instrumentation and control
 - g. Radiological safety
 - h. Mechanical and electrical engineering
 - i. Administrative controls
 - j. Environmental
 - k. Quality assurance practices

QUALIFICATIONS

- 6.5.2.3 The following minimum experience requirements shall be established for those persons involved in the independent off-site safety review and audit programs:
- a. Chairman and Vice Chairman-Bachelor of Science in engineering or related field or the equivalent and ten years related experience including five years involvement with operation and/or design of nuclear power plants.
 - b. Member-Bachelor of Science in engineering or related field or the equivalent and five years related experience including three years involvement with operation and/or design of nuclear power plants.

ALTERNATES

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

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CONSULTANTS

- 6.5.2.5 Consultants shall be utilized as determined by the NGRC Chairman to provide expert advice to the NGRC.

MEETING FREQUENCY

- 6.5.2.6 The NGRC 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.

QUORUM

- 6.5.2.7 A quorum of NGRC shall consist of the Chairman or his designated alternate and five additional NGRC members, including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

- 6.5.2.8 The NGRC shall review:
- a. Safety evaluations of changes to the facility, changes in procedures and tests and experiments not described in the Safety Analysis Report which were completed without prior NRC approval.
 - b. Proposed changes in the facility, changes in procedures or proposed tests or experiments which may involve an unreviewed safety question.
 - c. Changes in the Technical Specifications or license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change.
 - d. Violations, deviations and reportable events, which require reporting to the Nuclear Regulatory Commission in writing within 24 hours. This review should include results of investigations and recommendations resulting from such investigations.
 - e. Any other matter involving safe operation of the plant which an independent reviewer deems appropriate for consideration, or which is referred to the reviewers by members of Nuclear Operations staff or by other functional organizational units within Florida Power Corporation.
 - f. Reports and meeting minutes of the Plant Review Committee.

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AUDITS

- 6.5.2.9 Audits of facility activities shall be performed under the cognizance of the NGRC. These audits shall encompass:
- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
 - b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
 - 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 12 months.
 - f. The Facility Security Plan and implementing procedures at least once per 12 months.
 - g. The facility fire protection program and implementing procedures at least once per 12 months.
 - h. Any other area of facility operation considered appropriate by the NGRC or the Executive Vice President.

AUTHORITY

- 6.5.2.10 The NGRC shall report to and advise the Executive Vice President on those areas of responsibility specified in Sections 6.5.2.8 and 6.5.2.9.

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RECORDS

- 6.5.2.11 Records of NGRC activities shall be prepared, approved and distributed as indicated below:
- a. Minutes of each NGRC meeting shall be prepared, approved and forwarded to the Executive Vice President within 14 days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.8 above, shall be prepared, approved and forwarded to the Executive Vice President within 14 days following completion of the review.
 - c. Audit reports encompassed by Section 6.5.2.9 above, shall be forwarded to the Executive Vice President and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE OCCURRENCE ACTION

- 6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:
- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
 - b. Each REPORTABLE OCCURRENCE requiring 24-hour notification to the Commission shall be reviewed by the PRC and submitted to the NGRC and the Vice President, Nuclear Operations.

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6.7 SAFETY LIMIT VIOLATION

- 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:
- The facility shall be placed in at least HOT STANDBY within one hour.
 - The Safety Limit violation shall be reported to the Commission, the Vice President, Nuclear Operations and to the NGRC within 24 hours.
 - A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PRC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures and (3) corrective action taken to prevent recurrence.
 - The Safety Limit Violation Report shall be submitted to the Commission, the NGRC and the Vice President, Nuclear Operations within 14 days of the violation.

6.8 PROCEDURES

6.8.1 SCOPE

Written procedures shall be established, implemented and maintained covering the activities referenced below:

- The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.
- Refueling operations.
- Surveillance and test activities of safety related equipment.
- Security Plan implementation.
- Emergency Plan implementation.
- Fire Protection Program implementation.
- Systems Integrity Program implementation.
- Iodine Monitoring Program implementation.

6.8.2 REVIEW PROCESS

- 6.8.2.1 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed and approved prior to implementation as follows:
- The Emergency Plan, Security Plan, Fire Protection Plan and implementing procedures, Administrative Instructions, and those test procedures associated with safety related plant modifications shall be reviewed by the PRC and approved by the Nuclear Plant Manager prior to implementation.

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- b. For all other procedures, the review cycle shall consist of: an intradepartmental review by a Qualified Reviewer, an interdisciplinary review by Qualified Reviewer(s) in interfacing departments, as specified in Administrative Procedures, and approval by the responsible Superintendent or Manager, as specified by Administrative Procedures. The PRC shall then review the 10 CFR 50.59 evaluation within 14 days of approval.
- 6.8.2.2 The training and qualification of Qualified Reviewers shall be governed by Administrative Procedures, with final certification by the Nuclear Plant Manager. Recertification will be required on a periodic basis and upon transfer between departments. As a minimum, all Qualified Reviewers shall meet the requirements of ANSI N18.1-1971, Sections 4.2, 4.3, 4.4, or 4.6, or the equivalent.
- 6.8.2.3 Each procedure and administrative policy of 6.8.1 shall be reviewed on a periodic basis as set forth in Administrative Procedures.

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MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office, submitted no later than the 15th of each month following the calendar month covered by the report.

REPORTABLE OCCURRENCES

6.9.1.7 The REPORTABLE OCCURRENCES of Specifications 6.9.1.8 and 6.9.1.9 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

PROMPT NOTIFICATION WITH WRITTEN FOLLOW-UP

6.9.1.8 The types of events listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the Regional Office, or his designate, no later than the first working day following the event, with a written follow-up report within 14 days. The written follow-up report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Failure of the reactor protection system or other systems subject to limiting safety-system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety-system setting in the technical specifications or failure to complete the required protective function.
- b. Operation of the unit or affected systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the technical specifications.
- c. Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary, or primary containment.