

ATTACHMENT 1

SUMMARY OF PROPOSED CHANGES

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<u>Section</u>	<u>Description of Change</u>
AC 7.1.1	<ol style="list-style-type: none"><li>1) Reduced subsection headings from all capital letters to only first letter capitalized.</li><li>2) Added subsection 2.i. - staff working hour guidelines.</li><li>3) Added subsection 3.c. - Technical Advisor qualifications.</li></ol>
AC 7.1.2	<ol style="list-style-type: none"><li>1) Reduced subsection headings from all capital letters to only first letters capitalized.</li><li>2) Subsection 1 - revised PORC membership.</li></ol>
AC 7.1.3	<ol style="list-style-type: none"><li>1) Reduced subsection headings from all capital letters to only first letters capitalized.</li><li>2) Subsection 2 - revised the title of one NFSC member.</li><li>3) Subsection 7.b.(5) - revised audit frequency of the facility Emergency Plan and implementing procedures.</li><li>4) Subsection 7.b.(6) - revised audit frequency of the facility Security Plan and implementing procedures.</li><li>5) Subsection 7.b.(8) - clarified fire protection auditing requirements</li></ol>
Figure 7.1-2	Revised to reflect current organization.
AC 7.4.c.3	Revised to reflect current administrative responsibilities.

ATTACHMENT 2

PROPOSED CHANGES

## 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.

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2. Unit Staff

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 5 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.

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\*Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.

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- f. The Technical Advisor shall be in the control room within one hour after an emergency call. The Technical Advisors shall work 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, "Selection 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 N18.1-1971 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 NFPA 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  
Technical Services Engineering Supervisor  
Reactor Engineers  
Senior Plant Engineers  
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 procedures 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 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.
- c. Render determinations in writing with regard to whether or not each item considered under 5.a through 5.e 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.

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:

- 1) Nuclear Power Plant Operations
- 2) Nuclear Engineering
- 3) Chemistry and Radiochemistry
- 4) Metallurgy
- 5) Instrumentation and Control
- 6) Radiological Safety
- 7) Mechanical and Electrical Engineering
- 8) Quality Assurance Practices
- 9) (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 unrelied 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 review of the facility Emergency Plan and implementing procedures at least every 12 months by persons who have no direct responsibility for implementation of the Emergency Plan.

(6) The review of the facility Security Plan and implementing procedures at least every 12 months by individuals independent of both security program management and personnel who have direct responsibility for implementation of the Security Plan.

(7) Any other area of facility operation considered appropriate by the NFSC.

(8) With respect to fire protection:

(a) an annual fire protection and loss prevention inspection and audit utilizing either qualified off-site licensee personnel or an outside fire protection firm;

(b) a biennial audit of the fire protection program and implementing procedures;

(c) a triennial fire protection and loss prevention inspection and audit utilizing an outside qualified fire consultant.

#### 8. Authority

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



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

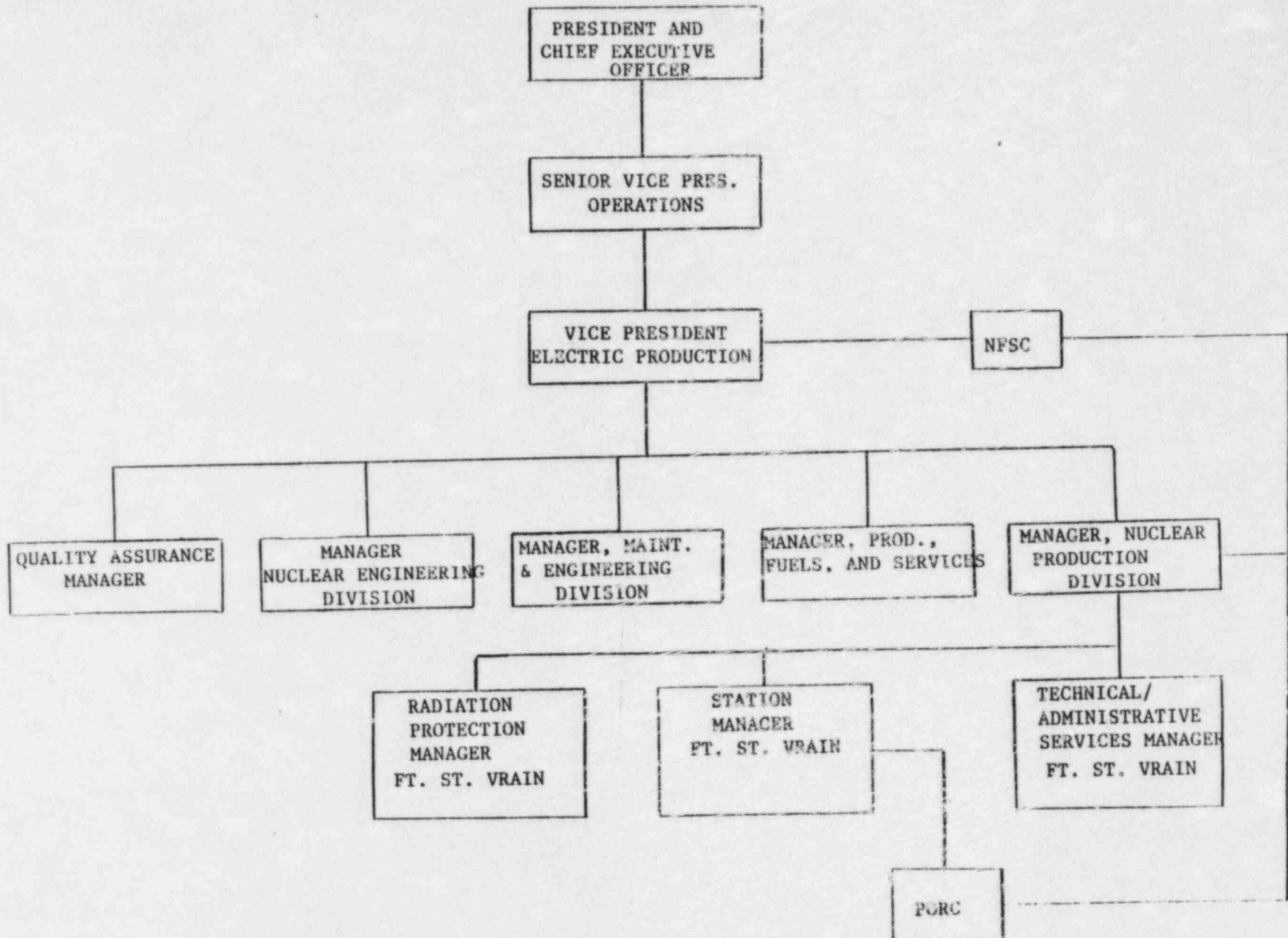


FIGURE 7.1-1





#### 7.4 PROCEDURES - ADMINISTRATIVE CONTROLS

##### Applicability

Applies to administrative procedures which will govern plant operations.

##### Objective

To ensure that written procedures will be maintained to define requirements for plant operation.

##### Specification AC 7.4 - Procedures, Administrative Controls

- a. Written procedures shall be established, implemented and maintained covering the activities referenced below:
  - 1. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November, 1972.
  - 2. Refueling operations.
  - 3. Surveillance and test activities of safety-related equipment.
  - 4. Security Plan implementation.
  - 5. Emergency Plan implementation.
- b. Procedures and administrative policies of a) above, and changes thereto, shall be reviewed by the PORC and approved by the appropriate Manager prior to

implementation and reviewed periodically as set forth in Administrative Procedures.

Security Plan procedures, and changes thereto, shall be reviewed by the Plant Operations Review Committee and approved by the designated Plant Security Officer prior to implementation.

Security Plan procedures and changes thereto, shall be reviewed by the Fort St. Vrain Security Committee.

c. Temporary changes to procedures of a) above may be made provided:

1. The intent of the original procedure is not altered.
2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operators License.
3. The change is documented, reviewed by the PORC and approved by the appropriate Manager within 14 days of implementation.

d. Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20, and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Respiratory protective equipment shall be provided in  
accordance with 10 CFR 20.103.