

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES

6.4.1.6 (Continued)

- c. Review of all proposed changes to Appendix "A" Technical Specifications;
- d. Review of all proposed changes or modifications to station systems or equipment that affect nuclear safety;
- 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 Executive Director - Nuclear Production and to the Nuclear Safety Audit Review Committee (NSARC);
- f. Review of all REPORTABLE EVENTS;
- g. Review of station operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Station Manager or the NSARC;
- i. ~~Review of the Security Plan and implementing procedures and submittal of recommended changes to the NSARC;~~ *Not used;*
- j. ~~Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the NSARC;~~ *Not used;*
- k. 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 Executive Director - Nuclear Production and to the NSARC;
- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and the Radwaste Treatment System; and
- m. Review of the Fire Protection Program and implementing instructions and submittal of recommended changes to the NSARC.

6.4.1.7 The SORC shall:

- a. Recommend in writing to the Station Manager approval or disapproval of items considered under Specification 6.4.1.6a. through d;
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.4.1.6a. through e. constitutes an unreviewed safety question; and
- c. Provide written notification within 24 hours to the Executive Director - Nuclear Production and the NSARC of disagreement between

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AUDITS

6.4.2.8 (Continued)

provided the combined time interval for any three consecutive intervals shall not exceed 3.25 times the specified interval. These audits shall encompass:

- a. The conformance of station 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 station staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in station 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 Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year;
- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months;
- k. ~~The Emergency Plan and implementing procedures at least once per 12 months;~~ *Not used;*
- l. ~~The Security Plan and implementing procedures at least once per 12 months; and~~ *Not used; and*
- m. Any other area of station operation considered appropriate by the NSARC or the Senior Vice President.

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6.7 PROCEDURES AND PROGRAMS

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

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- c. ~~Security Plan implementation;~~ *Not used;*
- d. ~~Emergency Plan implementation;~~ *Not used;*
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance Program for effluent and environmental monitoring;
- h. Fire Protection Program implementation; and
- i. Technical Specification Improvement Program implementation.

6.7.2 Each procedure of Specification 6.7.1, and changes thereto, shall be reviewed by the SORC and shall be approved by the Station Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

6.7.3 Temporary changes to procedures of Specification 6.7.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed by the SORC, and approved by the Station Manager within 14 days of implementation.

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

- a. Primary 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 RHR and containment spray, Safety Injection, chemical and volume control. The program shall include the following:

III. Retype of Proposed Changes

See attached retyped pages of the proposed changes to the Technical Specifications. The retyped pages reflect the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in these retyped pages. The retyped pages should be checked for continuity with the current Technical Specifications prior to issuance.

Revision bars are provided in the right hand margin to designate a change in the text. No revision bars are utilized when the page is changed solely to accommodate the shifting of text due to additions or deletions.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES

6.4.1.6 (Continued)

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- 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 Executive Director - Nuclear Production and to the Nuclear Safety Audit Review Committee (NSARC);
- f. Review of all REPORTABLE EVENTS;
- g. Review of station operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Station Manager or the NSARC;
- i. Not used;
- j. Not used;
- k. 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 Executive Director - Nuclear Production and to the NSARC;
- l. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and the Radwaste Treatment System; and
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- a. Recommend in writing to the Station Manager approval or disapproval of items considered under Specification 6.4.1.6a. through d;
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AUDITS

6.4.2.8 (Continued)

provided the combined time interval for any three consecutive intervals shall not exceed 3.25 times the specified interval. These audits shall encompass:

- a. The conformance of station 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 station staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in station 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 Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year;
- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months;
- k. Not used;
- l. Not used; and
- m. Any other area of station operation considered appropriate by the NSARC or the Senior Vice President.

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6.7 PROCEDURES AND PROGRAMS

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

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- c. Not used;
- d. Not used;
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance Program for effluent and environmental monitoring;
- h. Fire Protection Program implementation; and
- i. Technical Specification Improvement Program implementation.

6.7.2 Each procedure of Specification 6.7.1, and changes thereto, shall be reviewed by the SORC and shall be approved by the Station Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

6.7.3 Temporary changes to procedures of Specification 6.7.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed by the SORC, and approved by the Station Manager within 14 days of implementation.

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

- a. Primary Coolant Sources Outside Containment

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IV. Significant Hazards Consideration Evaluation

License Amendment Request (LAR) 94-03 has been analyzed pursuant to the requirements of 10CFR50.91(a), and it has been determined that this LAR does not involve a significant hazards consideration using the standards of 10CFR50.92. The details are provided below.

1. Operation of Seabrook Station with the revised Technical Specifications will not involve a significant increase in the probability or consequences of an accident. The likelihood that an accident will occur is neither increased or decreased by this Technical Specification change which only relocates review criteria to different documents or deletes redundant requirements. This Technical Specification change will not affect the function or method of operation of plant equipment, nor does it affect the response of any plant equipment. In addition, this change does not revise any plant operating procedures nor will it affect the manner in which plant personnel operate the plant. Thus, there is not a significant increase in the probability of a previously analyzed accident due to this change. No systems, equipment or components are affected by the proposed changes. Thus, the consequences of the malfunction of equipment important to safety previously evaluated in the Updated Final Safety analysis Report (UFSAR) are not increased by this change.

Therefore, the proposed change does not significantly increase the probabilities or consequences of an accident.

2. Operation of Seabrook Station in accordance with the proposed Technical Specifications will not create the possibility of a new or different kind of accident from any previously evaluated. The proposed changes do not involve changes to the physical plant or affect operation of the plant. Since audit and review requirements do not contribute to accident initiation, a change related to the deletion of redundant requirements or the relocation of requirements to different controlled documents cannot produce a new accident scenario or produce a new type of equipment malfunction. Also, this change does not alter any existing accident scenarios. The proposed change does not affect equipment or its operation, and, thus, does not create the possibility of a new or different kind of accident.

Therefore, the proposed change does not create the possibility of a new or different kind of accident.

3. Operation of Seabrook Station in accordance with the proposed Technical Specifications will not involve a significant reduction in a margin of safety. The proposed change concerning the deletion of redundant requirements and the relocation of other requirements to different documents does not directly affect plant equipment or operation. Safety limits and limiting safety system settings are not affected by this change nor are any limiting conditions for operation or related action statements.

Therefore, use of the proposed Technical Specifications will not involve any reduction in any margin of safety.

V. Environmental Impact Statement

North Atlantic has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluent which may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed changes meet the criteria delineated in 10CFR51.22(c)(10) for a categorical exclusion from the requirements for an Environmental Impact Statement.