

UNION ELECTRIC COMPANY

1901 GRATIOT STREET
ST. LOUIS, MISSOURI

DONALD F. SCHNELL
VICE PRESIDENT

August 31, 1983

MAILING ADDRESS:
P. O. BOX 149
ST. LOUIS, MISSOURI 63166

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

ULNRC-656

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
TECHNICAL SPECIFICATION SECTION 6.0

On August 12, 1983 a meeting was held between NRC and Union Electric personnel to discuss the administrative portion (Section 6.0) of the Callaway Plant, Unit 1 Technical Specifications. As a result, Union Electric is resubmitting Section 6.0 based on the agreements made at the meeting.

Please find attached five copies of marked-up Section 6.0 along with a summary listing of the items discussed during the August 12 meeting.

If you have further questions on this matter, please contact us.

Very truly yours,



Donald F. Schnell

Attachments

DS/lw

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PDR ADOCK 05000483
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STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell
Donald F. Schnell
Vice President
Nuclear

SUBSCRIBED and sworn to before me this 31st day of August , 1983.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
ST. LOUIS COUNTY.

cc: Glenn L. Koester
Vice President
Operations
Kansas Gas & Electric
P.O. Box 208
Wichita, Kansas 67201

Donald T. McPhee
Vice President
Kansas City Power and Light Company
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Kansas City, Missouri 64141

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Nicholas A. Petrick
Executive Director
SNUPPS
5 Choke Cherry Road
Rockville, Maryland 20850

John H. Neisler
Callaway Resident Office
U.S. Nuclear Regulatory Commission
RR#1
Steedman, Missouri 65077

Sent to NRC

SECTION 6.0

ADMINISTRATIVE CONTROLS

NRC DRAFT II 1/20/83

MARKED UP TYPED
RE MARKED 7/15/83

MASTER

UE Submittal after 8/12/83
meeting with NRC

These items were discussed and agreed to in the meeting of August 12, 1983 between Union Electric and the Nuclear Regulatory Commission:

	<u>Page No.</u>	<u>Sections</u>
1.	6-1	6.2.2.c; 6.2.2.e; 6.2.2.f; # footnote
2.	6-2	6.2.2.f
3.	6-5	Paragraph 1; ** footnote
4.	6-6	6.2.3.4; 6.2.3.5; 6.3.1; ** footnote - insert A
5.	6-7	* footnote
6.		Insert 1 - ORC
7.	6-9	6.5.1.7; deletion of insert 2
8.	6-10	Addition of 6.5.2.1.1; 6.5.2.2; 6.5.2.6; 6.5.2.7
9.	6-12	6.5.2.10
10.	6-13	6.5.3.1.a, b, c
11.	6-14	6.5.3.f
12.	6-16	6.8.1.i
13.	6-20	6.9.1.7 - ** footnote

Union Electric also considers the following items CLOSED which were left as OPEN items from August 12:

<u>Page No.</u>	<u>Section</u>	<u>Discussion</u>
6-6	6.3.1	UE has researched the letter of 3-28-80 and has incorporated NRC wording into this section.
6-3 & 6-4	Figs. 6.2-1 & 6.2-2	UE has updated these figures in this submittal and considers this item closed.

TECHNICAL SPECIFICATIONS SECTION 6.0

MEETING

AUGUST 12, 1983

ATTENDANCE

UE

Steve Miltenberger - Plant Mgr. -
Callaway
Dan Poole - Advisor to Plant Mgr. -
Callaway
Dave Shafer - UE Licensing
Andy Neuhalphen - Asst. Mgr. -
Operations and Mtc.
Sharon Rauba - Asst. Engr. - Compliance
Al Passwater - UE Licensing

NRC

Fred Anderson - NRC Standards Branch
Robert Benedict - NRC Reviewer
Dr. Gordon Edison - NRC Project Mgr.

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Manager, Callaway Plant shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President-Nuclear shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for unit management and technical support shall be as shown in Figure 6.2-1.

UNIT STAFF

6.2.2 The Unit organization shall be as shown in Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Operator shall be in the control room; ~~from the Health Physics Organization.~~
- c. ~~An individual qualified in radiation protection procedures, A Health physics technician~~ shall be on site when fuel is in the reactor; X
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site Fire Brigade ~~of~~ at least five members ~~##~~ shall be maintained onsite at all times. The Fire Brigade shall not include the Shift Supervisor and the (2) other 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; and
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, ~~health physicists, auxiliary operators, and key maintenance personnel.~~ ~~individual qualified in radiation protection procedures~~ ~~the Health Physics Technician and 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 provided immediate action is taken to fill the required positions.~~ X
health physics personnel, equipment operators, and ~~instrument technicians.~~ Key maintenance personnel.

ADMINISTRATIVE CONTROLS

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shut-down 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 7-day period, all excluding shift turnover time;
- 3) A break of at least 8 hours should be allowed between work periods, including shift turnover time; and
- 4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Emergency Duty Officer,

Any deviation from the above guidelines shall be authorized by the Manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC policy statement on working hours (Generic Letter NO. 82-12).

Table 6.2-1

MINIMUM SHIFT CREW COMPOSITION
SINGLE UNIT FACILITY

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODES 1, 2, 3 & 4	MODES 5 & 6
SS	1	1*
SRO	1	None
RO	2	1
EO	2	1
STA	1**	None

- SS - Shift Supervisor with a Senior Operator license on Unit 1
 SRO - Individual with a Senior Operator license on Unit 1
 RO - Individual with an Operator license on Unit 1
 EO - Equipment Operator
 STA - Shift Technical Advisor

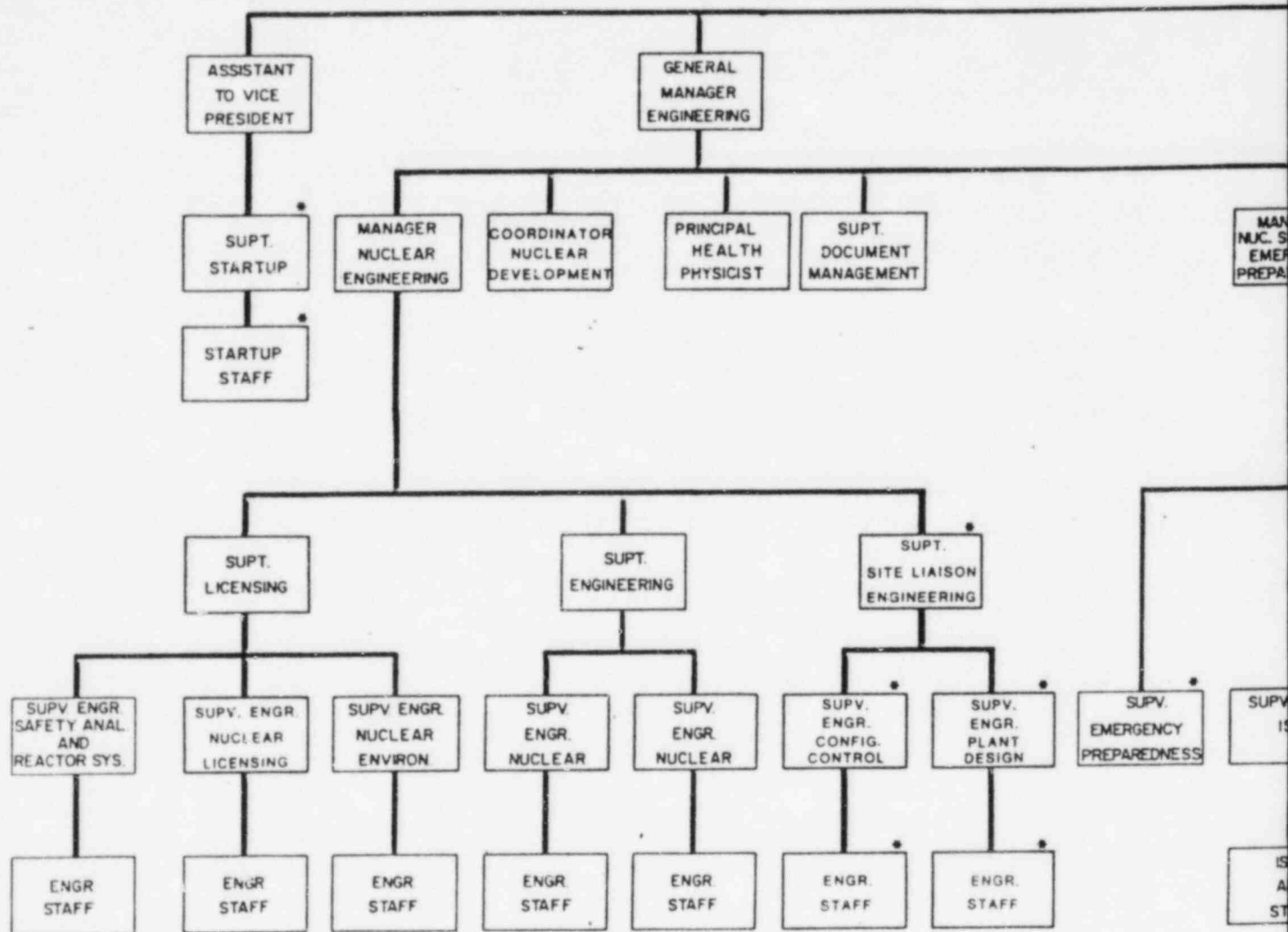
~~Except for the Shift Supervisor,~~ The Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. 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.

During any absence of the Shift Supervisor from the control room while the unit is in MODE 1, 2, 3 or 4, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in MODE 5 or 6, an individual with a valid Senior Operator or Operator license shall be designated to assume the control room command function.

* One SRO, either Shift Supervisor or Operating Supervisor

** ~~The STA position may be eliminated when an SRO on shift meets the NRC educational requirements for an STA and the Control Room design has been upgraded to NRC requirements for eliminating the STA position.~~

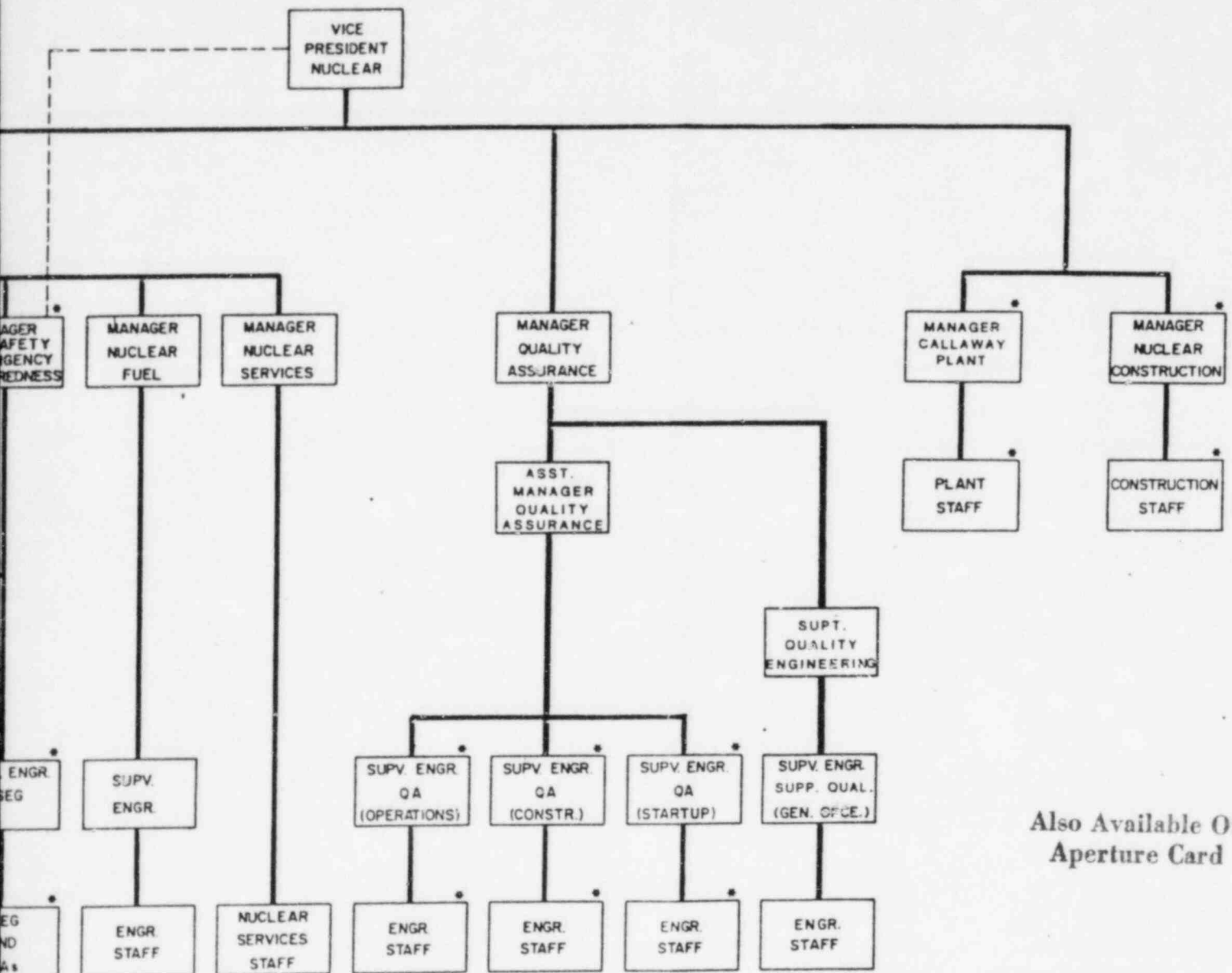
** The STA position shall be manned in modes 1 through 4 unless the Shift Supervisor or the Senior Reactor Operator meet the qualifications for the STA as required by the NRC.



* LOCATED ON SITE

----- COMMUNICATION PATH

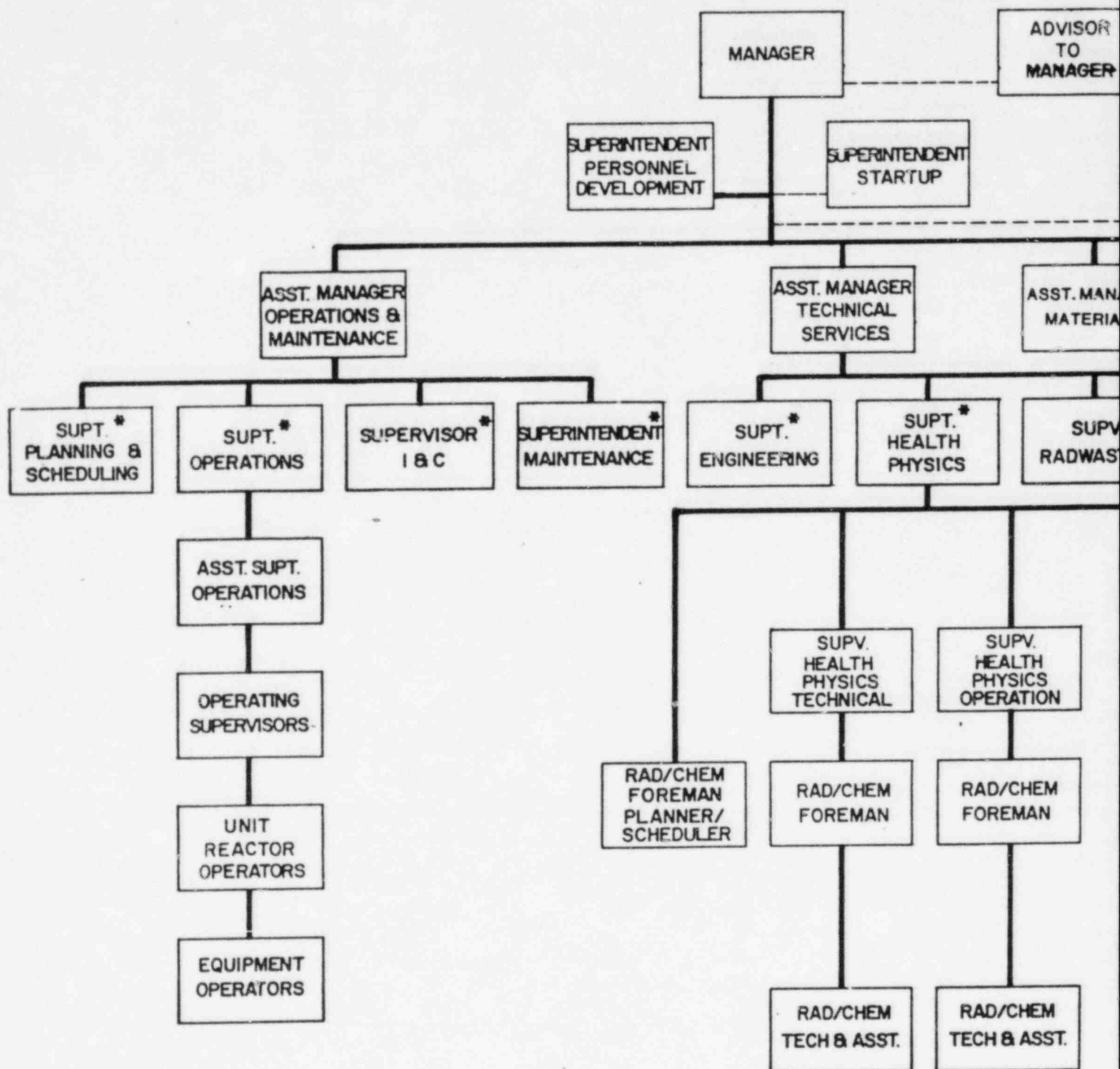
PRC. APERTURE CARD



Also Available On
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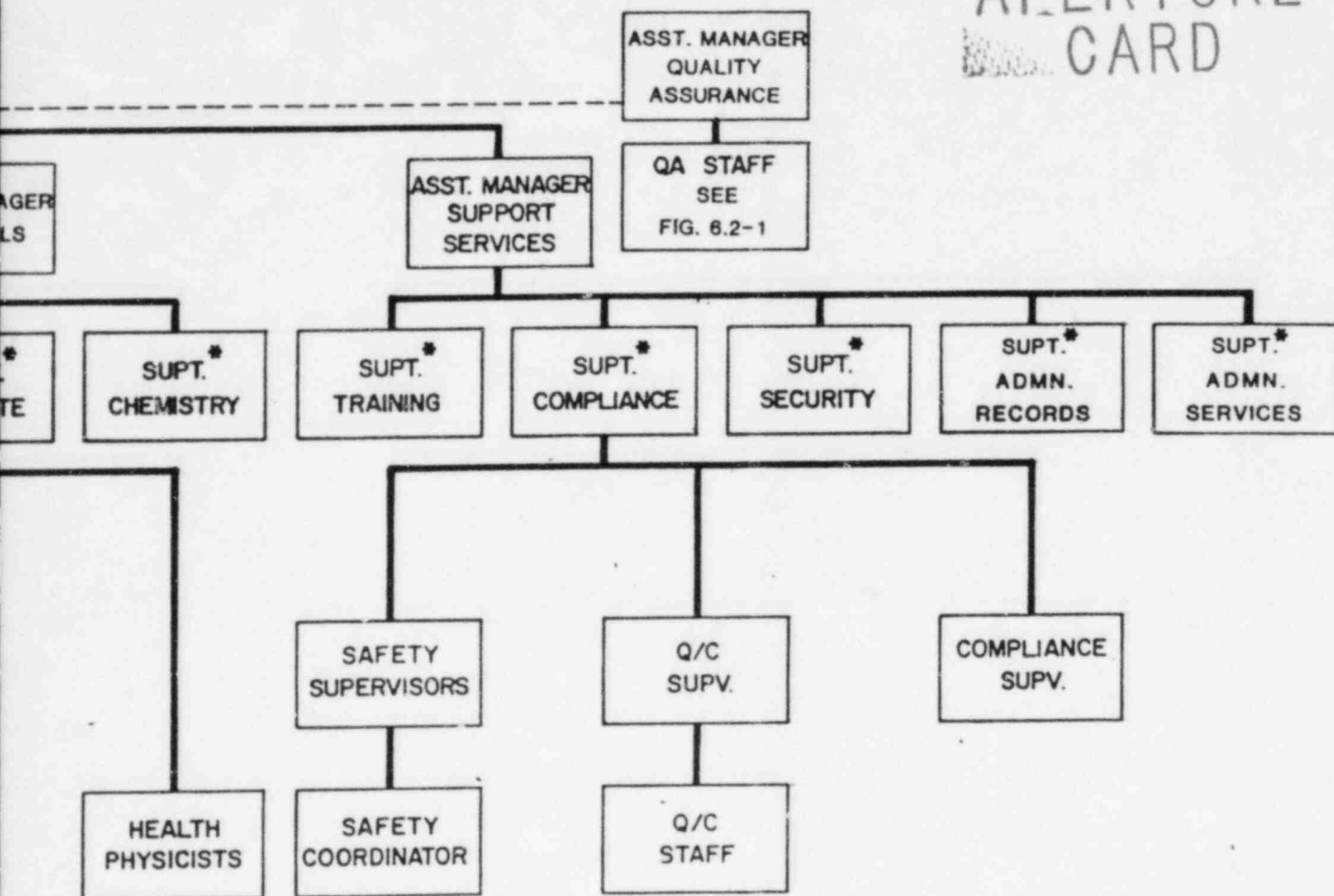
UNION ELECTRIC COMPANY
CALLAWAY PLANT UNIT 1
TECHNICAL SPECIFICATIONS

FIGURE 6.2-1
NUCLEAR FUNCTION
ORGANIZATION CHART



DEPARTMENT HEAD

PRC APERTURE CARD



Also Available On
Aperture Card

UNION ELECTRIC COMPANY
CALLAWAY PLANT UNIT I
TECHNICAL SPECIFICATIONS

FIGURE 6.2-2
CALLAWAY PLANT
OPERATING ORGANIZATION

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ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety. ←

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

~~6.2.3.4~~ The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Manager, Nuclear Safety and Emergency Preparedness and the Manager, Callaway Plant.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Manager, Nuclear Safety and Emergency Preparedness and the Manager, Callaway Plant.

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor^{**} shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

~~6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, except for the Radiation Protection Supt. Health Physics Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, proposed Rev. 2, 2-79 for a Radiation Protection Manager, September 1975, SEE INSERT B~~

*Not responsible for sign-off function.

** The STA position may be eliminated when an SRO on shift meets the NRC educational requirements for an STA and the Control Room design has been upgraded to NRC requirements for eliminating the STA position. See INSERT A

INSERT A

-
- ** The STA position shall be manned in modes 1 through 4 unless the Shift Supervisor or the Senior Reactor Operator meet the qualifications for the STA as required by the NRC.

INSERT B

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, except for the Superintendent, Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager. The licensed operators and senior operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Superintendent of Training and shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1978 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the ISEG.

6.5 REVIEW AND AUDIT

6.5.1 ON-SITE REVIEW COMMITTEE (ORC)

FUNCTION

6.5.1.1 The On-Site Review Committee shall function to advise the Manager, Callaway Plant on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The On-Site Review Committee shall be composed of the:

Chairman:	Manager, Callaway Plant
Member:	Asst Mgr, Oper and Maintenance
Member:	Asst Mgr, Tech Services
Member:	Asst Mgr, Support Services
Member:	Supv, Radiation Protection Supt., Health Physics
Member:	Supv Eng, Quality Assurance
*Member:	Adv to Mgr, Callaway Plant

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis^{**}; ~~however no more than two alternates shall participate as voting members in ORC activities at any one time.~~

* ~~Position to be abolished when provisions of ACRS letter dated November 17, 1981 are met.~~

~~This member may be removed when this position is abolished.~~

** Except for the alternate for the Supervising Engineer, Quality Assurance (Operations) who is appointed by the Manager, Quality Assurance.

ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

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

QUORUM

6.5.1.5 The minimum quorum of the ORC necessary for the performance of the ORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and ~~four~~ ^{AT LEAST} members ~~including alternates.~~

OF WHICH TWO MAY BE ALTERNATES

INSERT - 1

RESPONSIBILITIES

6.5.1.6 The On-Site Review Committee shall be responsible for:

- a. Review of: (1) all procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Manager, Callaway Plant to affect nuclear safety;
- b. Review of all proposed changes, tests and experiments which may involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- c. Review of all proposed changes to Technical Specifications or the Operating License;
- d. Review of all safety evaluations performed under the provision of Section 50.59(a)(1), 10 CFR, for changes, tests and experiments;
- 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 Vice President-Nuclear and to the Nuclear Safety Review Board;
- f. Review of events requiring 24-hour written notification to the Commission;
- g. Review of reports of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman, Nuclear Safety Review Board;
- i. Review of the plant Security Plan and implementing procedures and shall submit recommended changes to the Nuclear Safety Review Board;
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Nuclear Safety Review Board;

RESPONSIBILITIES

6.5.1.6 The On-Site Review Committee shall be responsible for ~~reviews of:~~

Review of

a. *^* All Administrative Procedures.

Review of

b. *^* The safety evaluations for (1) procedures, (2) change to procedures, equipment, systems or facilities, and (3) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question.

Review of

c. *^* Proposed procedures and changes to procedures, equipment, systems or facilities which may involve an unreviewed safety question as defined in 10 CFR 50.59 or involves a change in Technical Specifications.

Review of

d. *^* Proposed test or experiments which may involve an unreviewed safety question as defined in 10 CFR 50.59 or requires a change in Technical Specifications.

Review of

e. *^* Proposed changes to Technical Specifications or the Operating License.

f. Investigations of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President-Nuclear and to the Nuclear Safety Review Board.

Review of

g. *^* Reports of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety.

Review of

h. *^* *Events requiring prompt notification with written followup to the Commission*
~~All written reports to the Commission, concerning events which require 24 hour notification to the Commission.~~

Review of

i. *^* The plant Security Plan and shall submit recommended changes to the NSRB.

Review of

j. *^* The Radiological Emergency Response Plan and shall submit recommended changes to the NSRB.

k. Investigations or analysis of special subjects ~~as~~ ^{as} requested by the Chairman of the Nuclear Safety Review Board.

Review of

l. *^* Changes to the PROCESS CONTROL PROGRAM, and the OFFSITE DOSE CALCULATION MANUAL.

Review of

m. *^* Any accidental, unplanned or uncontrolled radioactive release including the preparation or reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Manager, Callaway Plant and to the Nuclear Safety Review Board.

ADMINISTRATIVE CONTROLS

- ~~k. Review of changes to the PROCESS CONTROL PROGRAM, and the OFFSITE DOSE CALCULATION MANUAL; and~~
- ~~l. 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 Manager, Callaway Plant and to the Nuclear Safety Review Board.~~

AUTHORITY

~~—INSERT— 2~~

6.5.1.7 The On-Site Review Committee shall:

Reinsert
this
Section

- ~~a. Recommend in writing to the Manager, Callaway Plant approval or disapproval of items considered under Specifications 6.5.1.6a. through ~~d.e.~~ above;~~
- ~~b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6a. through ~~d.f.~~ above, constitutes an unreviewed safety question; and~~
- ~~c. Provide written notification within 24 hours to the Vice President-Nuclear and the Nuclear Safety Review Board of disagreement between the ORC and the Manager, Callaway Plant; however, the Manager, Callaway Plant shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.~~

RECORDS

6.5.1.8 The On-Site Review Committee shall maintain written minutes of each ORC meeting that, at a minimum, document the results of all ORC activities performed under the responsibility and authority provisions of these Technical Specifications. Copies shall be provided to the Vice President-Nuclear and the Nuclear Safety Review Board.

6.5.2 NUCLEAR SAFETY REVIEW BOARD (NSRB)

FUNCTION

6.5.2.1 The Nuclear Safety Review Board 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,

ADMINISTRATIVE CONTROLS

REVIEW

6.5.2.X⁸ The NSRB shall ~~review~~ *be responsible for the review of:*

- a. The safety evaluations for: (1) changes to procedures, equipment, systems or facilities; and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, systems or facilities which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- d. Proposed changes to Technical Specifications or ~~this~~ *the this* Operating License;
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance ~~which are reportable under sections 6.9.1.10 and 6.9.1.11.~~ X
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. ~~Events requiring 24-hour written notification to the Commission;~~ *Events requiring prompt notification with written follow-up to the Commission.*
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meetings minutes of the On-Site Review Committee.

AUDITS

6.5.2.X⁹ Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of unit 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 unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months;

ADMINISTRATIVE CONTROLS

- 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;
- fk.* Any other area of unit operation considered appropriate by the NSRB or the Vice President-Nuclear *⊙* X
- fe.* The Fire Protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- fl.* The fire protection equipment and program implementation at least once per 12 months utilizing either 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;
- fg.* The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months; X
- fh.* The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- fi.* The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months; *ED*
- kj.* The performance of *for effluent and environmental monitoring* activities required by the Quality Assurance Program *to meet the provisions of Regulatory Guide 4.1, Revision 1, April 1975, at least once per 12 months; and* ~~to meet the provisions of Regulatory Guide 4.1, Revision 1, April 1975, at least once per 12 months; and~~ 4.15 X

AUTHORITY

~~6.5.2.7~~ ¹⁰ The NSRB shall report to and advise the Vice President-Nuclear on those areas of responsibility stated in Specifications 6.5.2.7 ~~and~~ 6.5.2.8 ⁹

MOVED TO
SECT.
6.5.2.1.1

RECORDS

~~6.5.2.8~~ ^{10/11} Records of NSRB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, ~~approved~~ ^{approved} and forwarded to the Vice President-Nuclear within 14 days following each meeting. ~~The minutes shall be approved at a subsequent meeting.~~
- b. Reports of reviews encompassed by Specification 6.5.2.7 above, shall be prepared, approved and forwarded to the Vice President-Nuclear within 14 days following completion of the review; and
- c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the ~~Vice President-Nuclear and to the management positions responsible for the areas audited~~ within 30 days after completion of the audit by the auditing organization.
and summaries of audits shall be prepared and forwarded to the Vice President-Nuclear.

ADMINISTRATIVE CONTROLS

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual (group) other than the qualified individual (group) which prepared the procedure or procedure change, but who may be from the same organization as the individual (group) which prepared the procedure or procedure change. Procedures other than Administrative Procedures shall be approved by the appropriate Department Head as designated in writing by the Manager, Callaway Plant. The Manager, Callaway Plant shall approve Administrative, Radiological Procedures, Security Plan implementing procedures and Emergency Plan Emergency implementing procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for by two members of the plant staff, at least one of whom holds a Senior Operator license and documented, reviewed by ORC, and approved by the Manager, Callaway Plant within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation;
- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Manager, Callaway Plant. Each such modification shall be reviewed by an individual (group) other than the qualified individual (group) which designed the modification, but who may be from the same organization as the individual (group) which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Manager, Callaway Plant;
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by an individual (group) other than the qualified individual (group) which prepared the proposed test or experiment. Proposed test and experiments shall be approved before implementation by the Manager, Callaway Plant;

These temporary changes ^{shall be} ~~are subsequently~~ approved by the original approval authority, ~~within 30 days.~~

ADMINISTRATIVE CONTROLS

- d. Individuals responsible for reviews performed in accordance with Specifications 6.5.3.1a, 6.5.3.1b, 6.5.3.1c, and 6.5.3.1d shall be members of the plant management staff previously designated by the Manager, Callaway Plant. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline;
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to Section 50.59, 10 CFR, NRC approval of items involving unreviewed safety question shall be obtained prior to Manager, Callaway Plant approval for implementation;
- f. ~~The plant Security Plan and Emergency Plan, and implementing procedures, shall be reviewed at least once per 12 months. Recommended changes shall be approved by the Manager, Callaway Plant, and transmitted to the Vice President-Nuclear and to the NSRB;~~
- g. ~~Changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL and radioactive waste treatment systems shall be reviewed by a qualified individual/group and approved by the Manager, Callaway Plant; and~~
- h. ~~Every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President-Nuclear and to the NSRB shall be reviewed by a qualified individual/group.~~

RECORDS

6.5.3.2 Records of the above activities shall be provided to the Manager, Callaway Plant, ORC and/or NSRB as necessary for required reviews.

- f. The Plant Security Plan and Radiological Emergency Response Plan and implementing procedures, shall be reviewed at least once per 12 months. Recommended changes to the implementing procedures shall be approved by the Manager, Callaway Plant. Recommended changes to the Plans shall be reviewed pursuant to the requirements of sections 6.5.1.6 and 6.5.2.78 and approved by the Manager, Callaway Plant. NRC approval shall be obtained as appropriate.

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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, and
- b. Each REPORTABLE OCCURRENCE requiring 24-hour notification to the Commission shall be reviewed by the ORC and submitted to the NSRB and the Vice President-Nuclear.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President-Nuclear and the NSRB shall be notified within 24 hours;
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ORC. 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;
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB, and the Vice President-Nuclear within 14 days of the violation; and
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 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. Refueling operations,
- c. Surveillance and test activities of safety-related equipment,
- d. Security Plan implementation,
Radiological Emergency Response
- e. ~~Emergency~~ Plan implementation,

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- f. Fire Protection Program implementation,
- g. PROCESS CONTROL PROGRAM implementation,
- h. OFFSITE DOSE CALCULATION MANUAL implementation, and
- i. Quality Assurance ~~Quality Assurance~~ Program for effluent and environmental monitoring, ~~using the guidance in Regulatory Guide 1.21, Revision 1, June 1974, and Regulatory Guide 4.1, Revision 1, April 1975.~~ *4/15, Standard 1977.*

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 The plant Administrative Procedures and changes thereto shall be reviewed in accordance with Specification 6.5.1.6 and approved in accordance with Specification 6.5.3.1. The associated implementing procedures and changes thereto shall be reviewed and approved in accordance with Specification 6.5.3.1.

6.8.4 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 recirculation portion of: the ~~Containment Spray, System Safety Injection, chemical and volume control, WASTE GAS HOLDUP SYSTEM, and hydrogen recombiners.~~ The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements, and
- 2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- 1) Training of personnel,
- 2) Procedures for monitoring, and
- 3) Provisions for maintenance of sampling and analysis equipment.

the Safety Injection System, the Residual Heat Removal System, and the Chemical and Volume Control System.

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c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- 1) Identification of a sampling schedule for the critical variables and control points for these variables,
- 2) Identification of the procedures used to measure the values of the critical variables,
- 3) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,
- 4) Procedures for the recording and management of data,
- 5) Procedures defining corrective action for all off-control point chemistry conditions, and
- 6) A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- 1) Training of personnel,
- 2) Procedures for sampling and analysis, and
- 3) Provisions for maintenance of sampling and analysis equipment.

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6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the NRC Regional Office unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of plant STARTUP and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the License involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The STARTUP Report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report. X

6.9.1.3 STARTUP Reports shall be submitted within: (1) 90 days following completion of the STARTUP test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the STARTUP Report does not cover all three events (i.e., initial criticality, completion of STARTUP test program, and resumption or commencement of commercial operation) supplementary reports shall be submitted at least every 3 months until all three events have been completed. X

ANNUAL REPORTS

6.9.1.4 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality. X

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions,² e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions.
- b. ~~Documentation of all challenges to the pressurizer power-operated relief valves (PORVs) and safety valves.~~

²This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

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ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.6 Routine Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, with operational controls as appropriate, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the Table and Figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.12.3; discussion of all deviations from the sampling schedule of Table 3.12-1; and discussion of all analyses in which the LLD required by Table 4.12-1 was not achievable.

*A single submittal may be made for a multiple unit station.

**One map shall cover stations near the site boundary; a second shall include the more distant stations.

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SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT*

6.9.1.7 Routine Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

The Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The Radioactive Effluent Release Report to be submitted within 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.** This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY (Figures 5.1-3 and 5.1-4) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

The Radioactive Effluent Release Report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from Reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, "Environmental Radiation Protection Standards for Nuclear Power

*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

~~**In lieu of submission with the first half year Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.~~
between the date of initial criticality and January 1 of the following year

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Operation." Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1, October 1977.

The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

- a. Container volume,
- b. Total Curie quantity (specify whether determined by measurement or estimate),
- c. Principal radionuclides (specify whether determined by measurement or estimate),
- d. Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent or absorbent (e.g., cement, urea formaldehyde).

The Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

MONTHLY OPERATING REPORT

Pressurizer Reactor Coolant System

6.9.1.8 Routine reports of operating statistics[↑] and shutdown[↑] experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the NRC Regional Office, no later than the 15th of each month following the calendar month covered by the report.

REPORTABLE OCCURRENCES

6.9.1.9 The REPORTABLE OCCURRENCES of Specifications 6.9.1.10 and 6.9.1.11 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.

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PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP

6.9.1.10 The types of events listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Regional Administrator of the NRC Regional Office, or his designate, no later than the first working day following the event, with a written followup report within 14 days. The written followup 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 Trip 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 trip 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;
- d. Reactivity anomalies involving disagreement with the predicted value of reactivity balance under steady-state conditions during power operation greater than or equal to 1% $\Delta k/k$; a calculated reactivity balance indicating a SHUTDOWN MARGIN less conservative than specified in the Technical Specifications; short-term reactivity increases that correspond to a reactor period of less than 5 seconds or, if subcritical, an unplanned reactivity insertion of more than 0.5% $\Delta k/k$; or occurrence of any unplanned criticality;
- e. Failure or malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of system(s) used to cope with accidents analyzed in the SAR;
- f. Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR;
- g. Conditions arising from natural or man-made events that, as a direct result of the event require unit shutdown, operation of safety systems, or other protective measures required by Technical Specifications;

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- h. Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the Safety Analysis Report or in the bases for the Technical Specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses;
- i. Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the Safety Analysis Report or Technical Specifications bases; or discovery during unit life of conditions not specifically considered in the Safety Analysis Report or Technical Specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition; and
- j. ~~failure of the pressurizer PORVs or safety valves.~~

THIRTY DAY WRITTEN REPORTS

6.9.1.11 The types of events listed below shall be the subject of written reports to the Regional Administrator of the NRC Regional Office within 30 days of occurrence of the event. The written 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. Reactor Trip System or Engineered Safety Feature Instrumentation Setpoints which are found to be less conservative than those established by the Technical Specifications but which do not prevent the fulfillment of the functional requirements of affected systems;
- b. Conditions leading to operation in a degraded MODE permitted by a Limiting Condition for Operation or plant shutdown required by a Limiting Condition for Operation;
- c. Observe inadequacies in the implementation of Administrative or Procedural Controls which threaten to cause reduction of degree of redundancy provided in Reactor Trip Systems or Engineered Safety Feature Systems; and
- d. Abnormal degradation of systems, other than those specified in Specification 6.9.1.11c above, designed to contain radioactive material resulting from the fission process.

and next page → A thirty day written report need not be submitted when equipment is removed from service, for reasons other than failure, to enter alternate or degraded modes of operation consistent with the provisions of a Technical Specification.

- e. An unplanned offsite release of: (1) more than 1 Curie of radioactive material in liquid effluents, (2) more than 150 Curies of noble gas in gaseous effluents, or (3) more than 0.05 Curie of radioiodine in gaseous effluents. The report of an unplanned offsite release of radioactive material shall include the following information:
- 1) A description of the event and equipment involved,
 - 2) Cause(s) for the unplanned release,
 - 3) Actions taken to prevent recurrence, and
 - 4) Consequences of the unplanned release.
- f. Measured levels of radioactivity in an environmental sampling medium determined to exceed the reporting level values of Table 3.12-2 when averaged over any calendar quarter sampling period.

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RADIAL PEAKING FACTOR LIMIT REPORT

6.9.1.12 The F_{xy} limit for RATED THERMAL POWER (F_{xy}^{RTP}) shall be provided to the Regional Administrator of the NRC Regional Office with a copy to the Director, Nuclear Reactor Regulation, Attention: Chief of the Core Performance Branch, U.S. Nuclear Regulatory Commission, Washington, D.C., 20555, for all core planes containing Bank "D" control rods and all unrodded core planes at least 60 days prior to cycle initial criticality. In the event that the limit would be submitted at some other time during core life, it shall be submitted 60 days prior to the date the limit would become effective unless otherwise exempted by the Commission.

Any information needed to support F_{xy}^{RTP} will be by request from the NRC and need not be included in this report.

SPECIAL REPORTS

6.9.2 Special Reports shall be submitted to the Regional Administrator of the NRC Regional Office within the time period specified for each report.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level;
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety;
- c. All REPORTABLE OCCURRENCES submitted to the Commission;
- d. Records of surveillance activities; inspections and calibrations required by these Technical Specifications;
- e. Records of changes made to the procedures required by Specification 6.8.1;
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results; and
- h. Records of annual physical inventory of all sealed source material of record.

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6.10.2 The following records shall be retained for the duration of the Unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories;
- c. Records of radiation exposure for all individuals entering radiation control areas;
- d. Records of gaseous and liquid radioactive material released to the environs;
- e. Records of transient or operational cycles for those unit components identified in Table 5.7-1;
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the unit staff;
- h. Records of in-service inspections performed pursuant to these Technical Specifications;
- ~~i. Records of Quality Assurance activities required by the QA Manual;~~
- i. ☒ Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- j. ☒ Records of meetings of the ORC and the NSRB;
- k. ☒ Records of the service lives of all snubbers listed in Tables 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records;
- l. ☒ Records of secondary water sampling and water quality; and
- m. ☒ Records of analysis required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

6.10.3 Records of Quality Assurance activities will be retained as identified by the
6.11 RADIATION PROTECTION PROGRAM Q.A. Program.

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.

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6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr 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)*. 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; OR
- 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 levels in the area have been established and personnel have been made knowledgeable of them; ~~and~~ OR
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by ~~the facility Health Physicist~~ in the RWP.

health physics management personnel
6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose greater than 1000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the ~~Shift Foreman on duty~~ Shift Supervisor, Operating Supervisor, and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrems** that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

* Health physics qualified personnel or personnel escorted by health physics qualified personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.

** Measurement made at 18" from source of radioactivity.

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6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee initiated changes to the PCP:

- a. Shall be submitted to the Commission in the Semi-annual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - 1) Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - 2) A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - 3) Documentation of the fact that the change has been reviewed and found acceptable by the ORC.
- b. Shall become effective upon review and ~~acceptance by the ORC.~~ approval in accordance with Specification 6.5.1.6 and 6.5.3.1.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Licensee initiated changes to the ODCM:

- a. Shall be submitted to the Commission in the Semi-annual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - 1) Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);
 - 2) A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - 3) Documentation of the fact that the change has been reviewed and found acceptable by the ORC.
- b. Shall become effective upon review and ~~acceptance by the ORC.~~ approval in accordance with Specifications 6.5.1.6 and 6.5.3.1.

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6.15 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS*

6.15.1 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid):

- a. Shall be reported to the Commission in the Semi-annual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the ORC. The discussion of each change shall contain:
 - 1) A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59;
 - 2) Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - 3) A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - 4) An evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - 5) An evaluation of the change, which shows the expected maximum exposures to a MEMBER OF THE PUBLIC in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - 6) A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - 7) An estimate of the exposure to plant operating personnel as a result of the change; and
 - 8) Documentation of the fact that the change was reviewed and found acceptable by the ORC.
- b. Shall become effective upon review and ~~acceptance by the ORC.~~
approval in accordance with
Specifications 6.5.1.6 and 6.5.3.1.

*Licensees may chose to submit the information called for in this specification as part of the annual FSAR update.



Docket No. 50-346

License No. NPF-3

Serial No. 1-377

August 15, 1983

RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

Mr. James G. Keppler, Director
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Boulevard
Glen Ellyn, IL 60137

Dear Mr. Keppler:

On May 18, 1983, Toledo Edison received IE Bulletin 83-05 (Log No. 1-788):
"ASME Nuclear Code Pumps and Spare Parts Manufactured by the Hayward Tyler
Pump Company".

The enclosed attachment provides Toledo Edison's response to this bulletin. Per NRC letter dated May 19, 1983 (Log No. 1-792), this attachment is considered Proprietary Information.

Very truly yours,

RPC/CTD/jmc

cc: U.S. Nuclear Regulatory Commission
Document Control Desk
NRC Resident Inspector

8309060266 830815
PDR ADOCK 03000346
PDR
Q

Attachment Contains
Proprietary Information
Per 10 CFR 2.790(d) -- Withhold
From Public Disclosure

AUG 22 1983

Change LPDR
PDR } Ltr
NPLS } Only
NSIC }

IE 11/11