

SAXTON NUCLEAR

Saxton Nuclear Experimental Corporation
Policy and Procedure Manual

Number

6675-ADM-4500.07

Title

Revision No.

SNEC Procedure Development, Change, Requests, and Safety Reviews
Applicability/Scope

1

Responsible Office

6675

This document is within QA plan scope
Safety Reviews Required

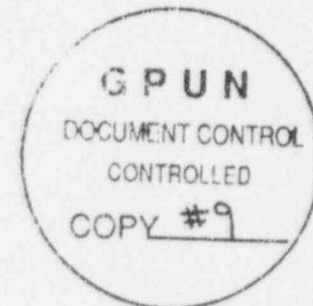
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Effective Date

10/14/91

List of Effective Pages

Page	Revision	Page	Revision	Page	Revision	Page	Revision
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2.0	0	E7-1	0				
3.0	0	E8-1	0				
4.0	0						
5.0	0						
6.0	0						
7.0	0						
8.0	0						
9.0	1						
10.0	1						
11.0	1						
12.0	1						
E1-1	0						
E2-1	0						
E2-2	0						
E3-1	0						
E3-2	0						
E4-1	0						
E5-1	0						



	Signature	Concurring Organizational Element	Date
Originator	<i>Neville Good</i>	Originator	10-14-91
Concurred By	<i>Scott R. Giff</i>	Technical Review	10-9-91
Approved By	<i>Neville Good</i>	Vice President, SNEC	10-14-91

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1.0 PURPOSE

To establish a procedure to implement the SNEC Document Preparation, Review and Approval Process by identifying the actions necessary for the preparation, review and approval of procedures and other types of documents.

2.0 APPLICABILITY/SCOPE

This procedure applies to all personnel who prepare, review or approve documents that pertain to SNEC activities.

3.0 DEFINITIONS

3.1 Environmental Determination

A determination of whether the activity as outlined by a document:

3.1.1 Meets the minimum requirements of Technical Specifications or documents that govern SNEC activities and/or

3.1.2 Involves any Potential Environmental Impact, as described in Section 3.5.

3.2 Environmental Evaluation

A written assessment of an activity which provides the basis for determining if the activity can be implemented without an environmental impact.

3.3 Safety Reviewer

An individual who performs a Safety Review. A Safety Reviewer is a knowledgeable individual not having direct responsibility for the performance of the activities under review and must be independent of the preparation of the document.

3.4 Non-Substantive Changes

Revisions which do not affect the activities associated with the document or the document's meaning or intent. Examples follow:

3.4.1 Correction to spelling.

3.4.2 Adding but not deleting sign-off spaces.

3.4.3 Blocking in notes, cautions, etc.

3.4.4 Changes in corporate or personal titles which do not reassign responsibilities and which are not referred to in the Technical Specifications.

3.4.5 Changes to nomenclature or editorial changes which clearly do not change function, meaning or intent.

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3.5 Potential Environmental Impact

A possible effect or influence on the environment resulting from a proposed activity, change, facility or process modification, production increase, test or experiment. The following are examples of potential environmental impacts:

- 3.5.1 A release or potential release to the environment.
- 3.5.2 A change in any systems, components or actions which affect the control of monitoring of actual or potential releases of radioactive or nonradioactive materials to the environment.
- 3.5.3 A physical or chemical change in the characteristics of plant effluents, withdrawals or other plant interfaces with the environment.
- 3.5.4 Disposal or storage for disposal of radioactive or non-radioactive waste material.
- 3.5.5 Endangering the health and safety of the public or workers.
- 3.5.6 Endangering the health of plants and animals.
- 3.5.7 Erosion of the soil or sediment on or surrounding the SNEC site.

3.6 Technical Reviewer

An individual who performs a technical review. The Technical Reviewer must be independent of the preparation of the document.

3.7 Safety Determination

A determination of whether an activity as implemented by a particular document involves:

- 3.7.1 Any potential adverse impact on nuclear safety or safe plant operations, or
- 3.7.2 A change to any of the following:
 - The Technical Specifications/License
 - The system/component description in the Safety Analysis Report (SAR),
 - The procedural/operating description in the SAR.
- 3.7.3 A change which involves a test or experiment not described in the SAR, or
- 3.7.4 The possibility of an Unreviewed Safety Question

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3.8 Safety Evaluation

A written assessment of a document which provides the basis for determining whether the activity can be implemented without adversely affecting nuclear safety.

3.9 Within the Scope of QA

Reference 6.1 provides a listing of SNEC activities which are considered important enough to apply Quality Assurance Program and/or verification requirements.

3.10 Procedure Numbers

Until such time as all SNEC Procedures have been renumbered and reference sections changed, procedure numbers starting 9400- and 6675- shall be considered the same (i.e., 9400-ADM-4500.22 referenced in any procedure will be referring to 6675-ADM-4500.22.)

4.0 PROCEDURE

4.1 Originating New Procedures

4.1.1 The originator shall obtain a document number and Exhibits 2 and 3 of this procedure from the Procedure Coordinator.

4.1.2 SNEC procedures shall be formatted as follows:

4.1.2.1 The cover page shall be in accordance with Exhibit 9.

4.1.2.2 Section 1.0 shall cover the Purpose of the document.

4.1.2.3 Section 2.0 shall cover Applicability/Scope.

4.1.2.4 Section 3.0 shall cover Definitions, if necessary.

4.1.2.5 Section 4.0 shall be the Procedure text itself.

4.1.2.6 Section 5.0 shall cover Responsibilities.

4.1.2.7 Section 6.0 shall list any References.

4.1.2.8 Section 7.0 shall contain any Exhibits.

4.1.3 Drafting Procedures

4.1.3.1 In order to complete the cover page of the document, decide if the document is, "within the scope of QA".

4.1.3.2 Write the procedure in single, short steps if possible.

4.1.3.3 Obtain cross-disciplinary input as deemed necessary.

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- 4.1.3.4 Provide enough guidance to permit implementation by the target group.
- 4.1.3.5 Assure procedure does not conflict with existing approved procedures/programs.
- 4.1.3.6 Assure procedure complies with the appropriate regulations (e.g., Tech Specs or Federal or State permits/licenses).
- 4.1.3.7 Provide flexibility in areas where possible while maintaining the intent of the procedure.
- 4.1.3.8 The Originator may also send drafts for inhouse technical reviewer.
- 4.1.4 Perform a Safety/Environmental Determination, (and Evaluations if required) per Section 4.2.
- 4.1.5 Select a Technical Reviewer according to the Matrix of Exhibit 4 and submit the package for technical review.
- 4.1.6 If a Safety Evaluation is done, submit the package for a Safety Review. Select a Safety Reviewer according to the Matrix of Exhibit 4.

NOTE: SNEC Safety Reviews are required for documents/changes if a Safety Evaluation has been performed. A Safety Review is not required if only an Environmental Evaluation has been done.

- 4.1.7 Determine individuals/groups that must concur. As a minimum organizations assigned responsibilities in the procedure must concur. Individuals/groups that must sign for concurrence shall be given a draft copy for review so that their comments may be considered for incorporation into the final draft. External review groups should be given a Document Review Sheet, Exhibit 8.
- 4.1.8 The originator shall attempt to resolve the comments made during the review process. Disagreements that cannot be resolved by the originator shall be referred to successively higher levels of authority. If agreement cannot be reached, final resolution shall be determined by the party designated to approve in the Review and Approval Matrix, Exhibit 4.
- 4.1.9 Submit the final draft of the document and the complete package to the Procedure Coordinator. The Procedure Coordinator shall:
 - Transmit the package for typing
 - Obtain the final signatures
 - Forward the document to Document Controls for distribution

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NOTE: Ensure a copy of the entire package has been maintained for departmental procedure records.

4.2 Safety and Environmental Reviews

4.2.1 Guidance for completing Exhibit 3.

4.2.1.1 The Originator/Preparer shall complete the Safety and Environmental Determination Form, (Exhibit 3), for all new documents and for substantive changes to existing documents, according to Sections 4.2.2 and 4.2.3.

4.2.1.2 The determinations are to show the reviewers and approvers that potential safety issues and environmental concerns have been recognized by considering:

- The effect of actions that are outlined in the procedure/document as they pertain to safety or environmental concerns.
- Compliance with Technical Specifications.

4.2.1.3 If any question on Exhibit 3 is answered "yes", the originator shall prepare and attach the appropriate written evaluations to Exhibit 3 per Sections 4.2.4 and/or 4.2.5.

4.2.1.4 If the Evaluation does not prove elimination or minimization of the concern, the document/document change cannot be implemented.

4.2.2 Safety Determination

Questions 1 and 2 of Exhibit 3 pertain to the Safety Determination as defined in Section 3.7.

4.2.2.1 If either question 1 or 2 is answered "yes", then a Safety Evaluation is required. See Section 4.2.4.

4.2.2.2 If question 2 is answered "yes", the document/activity cannot be implemented without prior NRC approval.

4.2.3 Environmental Determination

Questions 3, 4 and 5 pertain to the Environmental Determination as defined in Section 3.1. Environmental Controls personnel should consider the following guidance when performing the Environmental Determination:

4.2.3.1 Question 3 is intended to maintain compliance with any NRC requirements.

4.2.3.2 If the answer to question 3 is "yes", the document cannot be implemented without prior NRC approval.

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- 4.2.3.3 Question 4 is intended to determine if a potential Environmental Impact, as defined in Section 3.5, would result from the activity as outlined in the document or document change. Consider whether the document/activity could result in a release of radioactive or non-radioactive materials to the soil, the atmosphere or the surface or ground water.
- 4.2.3.4 Question 5 is meant to prompt the Originator to investigate regulations, requirements and agreements beyond those enforced by the NRC. The Environmental Protection Agency, Department of Transportation and the PI Department of Environmental Resources have an extensive body of regulations. The document/activity under review must also comply with the:
- Resource Conservation and Recovery Act, Clean Air Act, Clean Water Act
 - Erosion and Sediment Pollution Control Plan
- 4.2.3.5 Any "yes" answer on questions 3, 4 or 5 requires an Environmental Evaluation per Section 4.2.5.

4.2.4 Safety Evaluations

The Safety Evaluation shall be a written explanation of all "yes" answers, an explanation of how the activity will be implemented without adversely affecting nuclear safety and any calculations or other documents used to support the evaluation. Attach the Evaluation to Exhibit 3.

4.2.5 Environmental Evaluations

- 4.2.5.1 The Environmental Evaluation shall be a written explanation of all "yes" answers, an explanation of how the activity will be implemented without adversely impacting the environment and any calculations or other documents used to support the evaluation. Attach the Evaluation to Exhibit 3.
- 4.2.5.2 In performing the Environmental Evaluation consider both radiological and non-radiological releases.

4.3 Technical Reviewer

- 4.3.1 Review the entire document package including the procedure text, the completed Exhibit 3 and any attached written evaluations.
- 4.3.2 Sign the attached documents where required. The signature of the Technical Reviewer signifies concurrence that technical, safety and environmental considerations have been properly addressed, and that all determinations and evaluations are complete and accurate. The signature also indicates that the Technical Reviewer was independent of the Originator and releases the document for further processing.

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4.4 Safety Reviewer

- 4.4.1 Review the package to confirm that nuclear safety aspects of the document have been properly addressed and the Safety Evaluation is complete and accurate.
- 4.4.2 Obtain cross-disciplinary inputs and specialist assistance as needed to perform the Safety Review.
- 4.4.3 Sign the attached documents where required. The signature also attests that the Safety Reviewer was independent of the Originator and the Technical Reviewer.

4.5 Procedure Change Requests

A Procedure Change Request (PCR) is used when the change is not required immediately and the change is permanent in nature. Document changes and/or general revisions shall be initiated by use of Exhibit 2, "Procedure Change Request Form".

- 4.5.1 The Originator of the change shall obtain a tracking number from the Procedure Coordinator.
- 4.5.2 The Procedure Coordinator shall complete the PCR log, Exhibit 5.
- 4.5.3 The Originator shall complete Exhibit 2, Section 1.
 - 4.5.3.1 If the answer to question 1 is "no" make the revision and submit the package for implementing approval.

NOTE: Verify that the document has been properly classified.
 - 4.5.3.2 If the answer to question 1 is "yes", complete Exhibit 3 in accordance with Section 4.2.
 - 4.5.3.3 Submit all PCR documents for the required reviews in accordance with Sections 4.1.5 through 4.1.8.
 - 4.5.3.4 Submit the package to the Procedure Coordinator for the completion of duties as outlined in Section 4.1.9.

NOTE: Ensure a copy of the entire package has been maintained for departmental procedure records.

NOTE: Nonsubstantive revisions only require Originator and Approver signatures. However, the cover page needs to maintain the concurring organizational element status. Therefore, the concurring signature titles shall be left intact from the old revision. The signature blocks shall be marked as "N/A". The date of the previous review signature shall be filled in the date line for each concurring title marked as "N/A".

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4.6 Temporary Change Notices

- 4.6.1 Temporary Change Notices (TCN's) provide the ability to make substantive changes to a procedure in a short amount of time. The use of TCN's shall be limited to the following cases:
 - 4.6.1.1 When the change is of a temporary nature and should not result in a permanent revision, or
 - 4.6.1.2 When time or program conditions do not permit the use of a PCR. However, if the change is permanent a PCR shall be submitted, by the Originator of the TCN, and approved within 90 days.
- 4.6.2 Preparation of TCN's
 - 4.6.2.1 The Originator shall obtain a TCN number from the Procedure Coordinator.
 - 4.6.2.2 The Procedure Coordinator shall complete the TCN Log, Exhibit 6.
 - 4.6.2.3 The Originator shall complete Section 2, Part (a) of Exhibit 2.
 - 4.6.2.4 The Originator shall also complete Exhibit 3 per Section 4.2 for all TCN's to ensure safety and environmental concerns are addressed and that the minimum requirements of any implementing documents are met (i.e., Tech Specs, etc.)
 - 4.6.2.5 In Section 2 of Exhibit 2, provide a general description of the change(s). Reference affected pages and section numbers.
 - 4.6.2.6 Attach an edited copy of the affected pages of the procedure to Exhibit 2.
 - 4.6.2.7 The review requirements for TCN's are the same as those outlined in Sections 4.1.4 through 4.1.6.
 - 4.6.2.8 The Originator is responsible for obtaining all review and implementing signatures.
 - 4.6.2.9 The TCN shall become effective with the Implementing Approver signature. The Originator shall then make a working copy of the TCN package for use by the target group.
 - 4.6.2.10 The original TCN packet shall be forwarded to the Procedure Coordinator. A copy shall be transmitted to Document Control for distribution.
- 4.6.3 Cancellation of TCN's
 - 4.6.3.1 A TCN is good for a maximum of 90 days and can be cancelled by one of the following:
 - * Incorporation into an implemented procedure change

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- Expiration date
- Early cancellation by the Originator

- 4.6.3.2 The Originator is responsible for the cancellation of TCN's.
- 4.6.3.3 The Originator is responsible for tracking his/her TCN expiration date.
- 4.6.3.4 To cancel a TCN, obtain the original package from the Procedure Coordinator and complete Part (b), Section 2 of Exhibit 2.
- 4.6.3.5 Forward the cancelled TCN package to the Procedure Coordinator for transmittal to Document Control.
- 4.6.3.6 When a PCR which incorporates a TCN is approved, cancel the TCN and submit both packages to the Procedure Coordinator for transmittal to Document Control.

NOTE: Use the effective date of the new procedure as the cancellation date of the TCN.

4.7 Implementing Approval

- 4.7.1 The Implementing Approver will be as described in Exhibit 4.
- 4.7.2 The Implementing Approver, along with the Originator, will establish the effective date of the document at the time of final signature.

NOTE: When choosing an effective date consider the time necessary for final distribution.

5.0 RESPONSIBILITIES

5.1 The Originator is responsible for:

- 5.1.1 Preparing a technically adequate document.
- 5.1.2 Obtaining applicable technical, safety and cross-disciplinary reviews as required.
- 5.1.3 Resolving any comments made during the review process.
- 5.1.4 Completing the Safety/Environmental determination and any required evaluations.

5.2 The Technical Reviewer is responsible for ensuring that:

- 5.2.1 The activities performed in accordance with the document being reviewed are technically correct and concordant with safe plant operations.

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5.2.2 The activities performed in accordance with the document being reviewed meet legally mandated monitoring requirements.

5.3 The Safety Reviewer is responsible for ensuring that nuclear safety considerations have been adequately evaluated and are properly addressed in the Safety Evaluation.

5.4 The implementing Approver is responsible for:

5.4.1 Ensuring that the administrative requirements of this procedure have been satisfied.

5.4.2 Releasing the document for implementation.

5.5 The Procedure Coordinator is responsible for:

5.5.1 Maintaining document logs.

5.5.2 Maintaining procedure records.

5.5.3 Complying with record retention and reporting requirements.

5.5.4 Forwarding documents to Document Control for processing.

6.0 REFERENCES

6.1 SNEC Technical Specifications

6.2 9400-PLN-4542.02, SNEC Soil Erosion and Sedimentation Control Plan

7.0 EXHIBITS

7.1 Exhibit 1, "Flow Chart for Safety Review and Approval Process"

7.2 Exhibit 2, "Procedure Change Request Form"

7.3 Exhibit 3, "Safety/Environmental Determination Form"

7.4 Exhibit 4, "SNEC Review and Approval Matrix"

7.5 Exhibit 5, "Procedure Change Request Log"

7.6 Exhibit 6, "Temporary Change Notice Log"

7.7 Exhibit 7, "Document Review Sheet"

7.8 Exhibit 8, "Document Cover Page"

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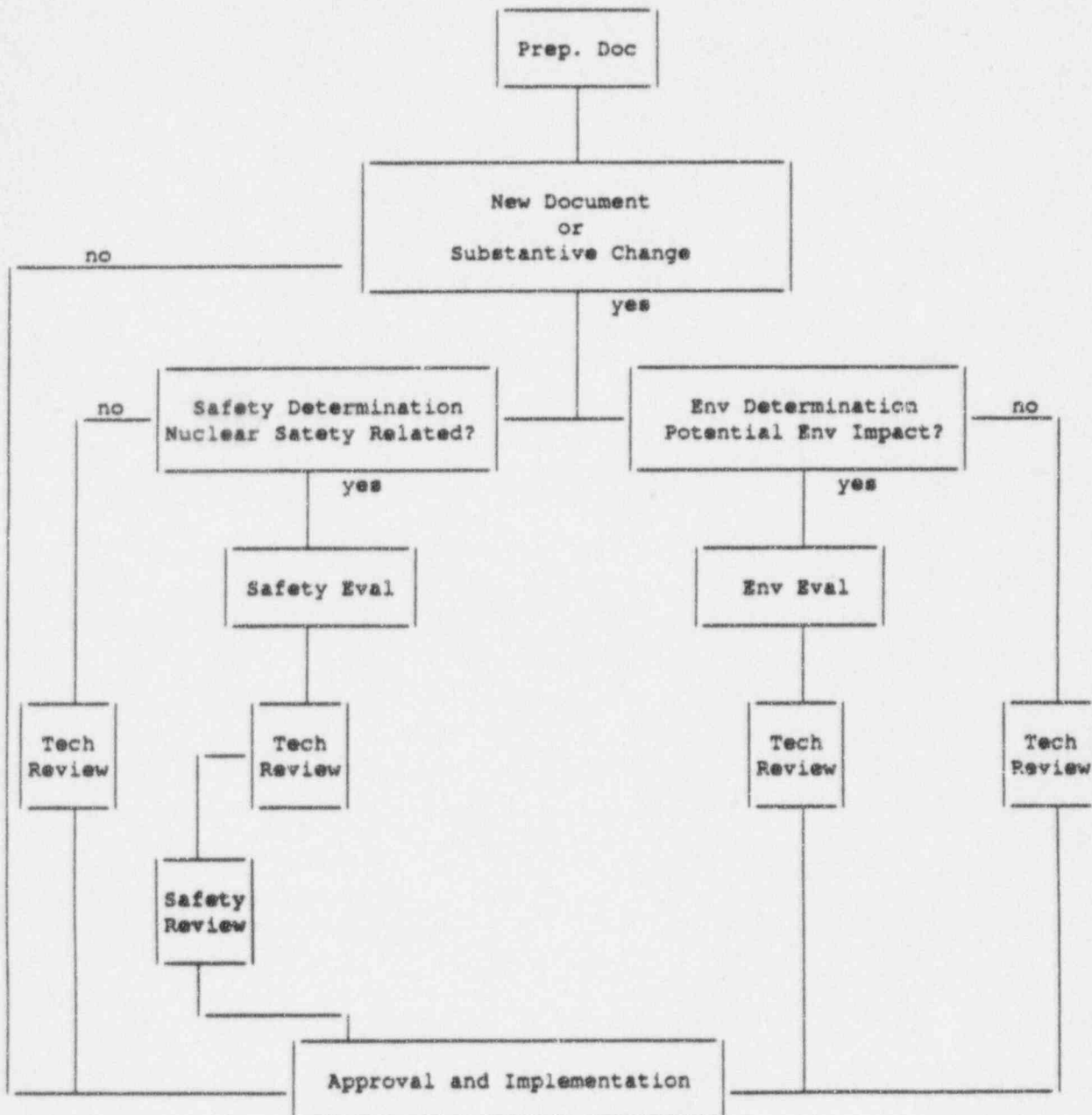
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EXHIBIT 1

FLOW CHART FOR SAFETY REVIEW AND APPROVAL PROCESS



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EXHIBIT 2

PROCEDURE CHANGE REQUEST FORM

Is this a: ☐ New Document
☐ PCR
☐ TCN

If so, complete Section 1
If so, complete Section 1
If so, complete Section 2

Section 1 . Circle the appropriate "yes" or "no" answer

PCR # _____ Date _____

Procedure No. _____ Rev. _____

Document Title: _____

- 1) Is this a new procedure of a substantive revision to the document? See Section 3.4 for examples of nonsubstantive changes. YES NO

If the answer is "yes", complete Exhibit 3.

If "no", forward the document for implementing approval.

- 2) Does this PCR incorporate a TCN? YES NO

If the answer is "yes", what is the TCN # _____

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EXHIBIT 2 (Cont'd)

Section 2

Part (a)

TCN # _____ Effective Date _____

Procedure No. _____ Rev. _____

Document Title: _____

Reason for Change: _____

Originator initials signifying Exhibit 3 has been completed _____

Expiration Date _____ (not to exceed 90 days)

Part (b)

Cancelled _____

Originator signature/Date

Cancelled by _____ PCR _____ Originator _____ Expired
(check one)

Description of change:

Originator _____ Date _____

Technical Review _____ Date _____

Safety Review _____ Date _____

Implementing Approver _____ Date _____

Implementing Approver _____ Date _____

print/sign

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EXHIBIT 3

SAFETY/ENVIRONMENTAL DETERMINATION FORM

ATTACH THIS FORM TO EXHIBIT 2

CIRCLE AN ANSWER FOR ALL QUESTIONS

JUSTIFY ALL "NO" ANSWERS

PROCEDURE # _____

PCR/TCN # _____

SAFETY DETERMINATION

- 1) Does this document/activity affect
nuclear safety?

YES NO

- 2) Does this document/activity involve a
change to the Tech Specs or SAR?

YES NO

If both answers are "no" proceed to questions 3, 4 and 5. No Safety Evaluation is necessary.

If one or both answers are "yes", a Safety Evaluation must be done. See Section 4.2.4. Questions 3, 4 and 5 must also be completed.

- 3) Does this document/activity involve a
change to any NRC required environmental
monitoring program?

YES NO

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EXHIBIT 3 (Cont'd)

ENVIRONMENTAL DETERMINATION

- 4) Does this document/activity have an Environmental Impact as defined in Section 4.2.3.3? YES NO

- 5) Does the proposed change or activity conflict with other Federal or State regulations? See Section 4.2.3.4. YES NO

If all answers are "no" forward the document to the Technical Reviewer.

If any answer is "yes" perform an Environmental Evaluation. See Section 4.2.5. Submit the package for technical review.

ATTACH ALL WRITTEN EVALUATIONS TO THIS FORM

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EXHIBIT 4

SNEC REVIEW AND APPROVAL MATRIX

<u>Subject</u>	<u>Technical Review</u>	<u>Safety Review</u>	<u>Implementing Approval</u>
Department Plans and Procedures	Radiological and Env Controls	Radiological and Env Controls *	SNEC General Mgr. and/or SNEC V.P.

* Select the Safety Reviews per Section 3.3

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EXHIBIT 5
PROCEDURE CHANGE REVIEW LOG[illegible]

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TCM LOG

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EXHIBIT 8

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This document is within QA plan scope		9400
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	Signature	Concurring Organizational Element	Date
ORIGINATOR			
Concurred			
By			
Approved			
By			