

ATTACHMENT 2
TECHNICAL SPECIFICATION PAGES WITH PEN AND INK CHANGES

LICENSE AMENDMENT APPLICATION
CHANGE ADMINISTRATIVE CONTROLS TO REFLECT
ORGANIZATIONAL CHANGES
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

NLR-N94225
LCR 94-35

The following Technical Specifications have
been revised to reflect the proposed changes:

<u>Technical Specifications</u>	<u>Pages</u>
6.1.2	6-1
6.2.1.c	6-1
6.5.1.8.b	6-9
6.5.1.9	6-9
6.5.2.2	6-9
6.5.2.4.3.g	6-11
6.5.2.4.4.a	6-12
6.5.2.4.4.b	6-12
6.5.2.6	6-13
6.6.1.b	6-14
6.7.1.a	6-14
6.7.1.c	6-15

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager - Hope Creek Operations shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Senior Nuclear 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 and Chief Nuclear Officer~~, shall be reissued to all station personnel on an annual basis. *and President - Nuclear Business Unit.*

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Hope Creek Generating Station Updated Final Safety Analysis Report and updated in accordance with 10 CFR 50.71(e).
- b. The General Manager - Hope Creek Operations shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant. *and President - Nuclear Business Unit*
- c. The ~~Vice President and Chief Nuclear Officer~~ shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;

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AUTHORITY

6.5.1.8 The SORC shall:

- a. Provide recommendations in writing to the General Manager - Hope Creek Operations indicating approval or disapproval of items considered under Specification 6.5.1.6 prior to their implementation.
 - b. Provide written notification within 24 hours to the ^{Director} Vice President - ^{Nuclear Operations} ~~and Chief Nuclear Officer~~ and to the General Manager - Quality Assurance and Nuclear Safety, of disagreement between the SORC and the General Manager - Hope Creek Operations; however, the General Manager - Hope Creek Operations shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.
- Review

RECORDS AND REPORTS

- Nuclear Operations

6.5.1.9 The SORC shall maintain minutes of each SORC meeting, and copies shall be provided to the Vice President ^{Review} ~~and Chief Nuclear Officer, General Manager - Quality Assurance and Nuclear Safety, and Manager - Nuclear Safety.~~

Director -

6.5.2 NUCLEAR SAFETY REVIEW AND AUDIT

FUNCTION

6.5.2.1 The Nuclear Safety Department shall function to provide the independent safety review program and audit of designated activities.

COMPOSITION

6.5.2.2 The Nuclear Safety Department, under ^{Review} the cognizance of the ~~General Manager - Quality Assurance and Nuclear Safety,~~ shall consist of the Manager - Nuclear Safety, the Offsite Safety Review staff (OSR) and the Onsite Safety Review Group (SRG). The OSR staff and the SRG each consist of at least four dedicated, full-time engineers.

Director -

The Manager - Nuclear Safety and the Offsite Safety Review staff shall meet or exceed the qualifications described in Section 4.7 of ANS 3.1 - 1981 and shall be guided by the provisions for independent review described in Section 4.3 of ANSI N18.7 - 1976 (ANS 3.2).

The Offsite Safety Review staff shall generally possess experience and competence in the areas listed in Section 6.5.2.4.1. A system of qualified reviewers from other technical organizations shall be utilized to augment OSR staff expertise in the disciplines of Section 6.5.2.4.1, where appropriate. Such qualified reviewers shall meet the same qualification requirements as the Offsite Safety Review staff, and shall not have been involved with performance of the original work.

The Onsite Safety Review Group staff shall meet or exceed the qualifications described in Section 4.4 of ANS 3.1 - 1981.

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- f. All REPORTABLE EVENTS.
- g. 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
- h. Reports and meeting minutes of the SORC.

AUDITS

6.5.2.4.3 Audits of facility activities shall be performed under the cognizance of the OSR staff. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months;
- f. The Facility Security Plan and implementing procedures at least once per 12 months;
- g. Any other area of facility operation considered appropriate by the ~~General Manager~~ ^{Review} Quality Assurance and Nuclear Safety, or the Vice-President and Chief Nuclear Officer; ^{and President - Nuclear Business Unit}
- h. The facility Fire Protection Program and the implementing procedures at least once per 24 months;
- i. The fire protection and loss prevention program implementation at least once per 12 months utilizing either a qualified off-site licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least once per 36 months; and
- j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;

Director

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1. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months; and,
- m. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

The above audits may be conducted by the Quality Assurance Department or an independent consultant. Audit plans and final audit reports shall be reviewed by the OSR staff.

RECORDS AND REPORTS

6.5.2.4.4 Records of OSR activities shall be maintained. Reports of reviews and audits shall be prepared and distributed as indicated below:

- a. The results of reviews performed pursuant to Section 6.5.2.4.2 shall be reported to the ~~Vice President and~~ Chief Nuclear Officer, at least monthly. and President - Nuclear Business Unit
- b. Audit reports prepared pursuant to Specification 6.5.2.4.3 shall be forwarded by the auditing organization to the ~~Vice President and~~ Chief Nuclear Officer, and to the management positions responsible for the areas audited (1) within 30 days after completion of the audit for those audits conducted by the Quality Assurance Department, and (2) within 60 days after completion of the audit for those audits conducted by an independent consultant.

and President -
Nuclear Business Unit

6.5.2.5 ONSITE SAFETY REVIEW GROUP (SRG)

FUNCTION

6.5.2.5.1 The SRG shall function to provide: the review of plant design and operating experience for potential opportunities to improve plant safety; evaluation of plant operations and maintenance activities; and advice to management on the overall quality and safety of plant operations.

The SRG shall make recommendations for revised procedures, equipment modifications, or other means of improving plant safety to appropriate station/corporate management.

RESPONSIBILITIES

6.5.2.5.2 The SRG shall be responsible for:

- a. Review of selected plant operating characteristics, NRC issuances, industry advisories, and other appropriate sources of plant design and operating experience information which may indicate areas for improving plant safety.
- b. Review of selected facility features, equipment, and systems.
- c. Review of selected procedures and plant activities including maintenance, modification, operational problems, and operational analysis.

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- d. Surveillance of selected plant operations and maintenance activities to provide independent verification* that they are performed correctly and that human errors are reduced to as low as reasonably achievable.

AUTHORITY

6.5.2.6 The Nuclear Safety Department shall report to and advise the ~~Vice-President and Chief Nuclear Officer~~ on those areas of responsibility specified in Sections 6.5.2.4 and 6.5.2.5. ~~and President - Nuclear Business Unit~~

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 All programs and procedures required by Technical Specification 6.8 and changes thereto, and any other proposed procedures or changes thereto, which affect plant nuclear safety as determined by the General Manager - Hope Creek Operations, other than editorial or typographical changes, shall be reviewed as follows:

PROCEDURE RELATED DOCUMENTS

6.5.3.2 Procedures, Programs and changes thereto shall be reviewed as follows:

- a. Each newly created procedure, program or change thereto shall be independently reviewed by an individual knowledgeable in the area affected other than the individual who prepared the procedure, program 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 Station Administrative procedures will be approved by the appropriate station Department Manager or by the General Manager - Hope Creek Operations. Each station Department Manager shall be responsible for a pre-designated class of procedures. The General Manager - Hope Creek Operations shall approve Station Administrative Procedures, Security Plan implementing procedures and Emergency Plan implementing procedures.
- b. On-the-spot changes to procedures which clearly do not change the intent of the approved procedures shall be approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License. Revisions to procedures which may involve a change in intent of the approved procedures, shall be reviewed in accordance with Section 6.5.3.2.a above.
- c. Individuals responsible for reviews performed in accordance with item 6.5.3.2.a above shall be approved by the SORC Chairman and designated as a Station Qualified Reviewer. A system of Station Qualified Reviewers shall be maintained by the SORC Chairman. Each review shall include a written determination of whether or not additional

* Not responsible for sign-off function.

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cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate designated review personnel. The Station Qualified Reviewers shall meet or exceed the qualifications described in Section 4.1 and 4.7 of ANS 3.1, 1981.

- d. If the Department Manager determines that the documents involved require a 10 CFR 50.59 safety evaluation, the documents shall be forwarded for SORC review and also to the OSR staff for an independent review to determine whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions or requiring Technical Specification changes shall be obtained prior to implementation.

NON-PROCEDURE RELATED DOCUMENTS

6.5.3.3 Tests or experiments, and changes to equipment or systems shall be forwarded for SORC review and also to the OSR staff for an independent review to determine whether or not an unreviewed safety question is involved. The results of the OSR staff reviews will be provided to SORC. Recommendations for approval are made by SORC to the General Manager - Hope Creek Operations. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions or requiring Technical Specification changes shall be obtained prior to implementation.

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6.5.3.4 Written records of reviews performed in accordance with item 6.5.3.2a above, including recommendations for approval or disapproval, shall be maintained. Copies shall be provided to the General Manager - Hope Creek Operations, SORC, the OSR staff, and/or NRC as necessary when their reviews are required.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified pursuant to the requirements of Section 50.72 to 10 CFR Part 50 and a report submittal pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the OSR staff and the ~~Vice-President and Chief Nuclear Officer~~ and President - Nuclear Business Unit

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 and Chief Nuclear Officer~~ and the ~~General Manager~~ Quality Assurance and Nuclear Safety shall be notified within 24 hours. ^{Review} ~~Director~~

and President -
Nuclear Business Unit

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- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. Director ~~The Safety Limit Violation Report shall be submitted to the Commission, the General Manager, Quality Assurance and Nuclear Safety, and the Vice President and Chief Nuclear Officer within 30 days of the violation.~~ Review |
and President - Nuclear Business Unit
- 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. The applicable procedures required to implement the requirements of NUREG-0737 and supplements thereto.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environment monitoring.

6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed and approved in accordance with specification 6.5.1.6 or 6.5.3, as appropriate, prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 On-the-Spot changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Reactor Operator license on the unit affected; and