

ATTACHMENT 1

LIMERICK GENERATING STATION
UNIT 1 AND UNIT 2

Docket Nos.

50-352

50-353

License Nos.

NPF-39

NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST NOS.

93-12-0,	"NEEDS Organization Title Changes"
94-46-0,	"Minimum Shift Crew Composition"
94-51-0,	"Delete Independent Technical Review Section from TS"
94-52-0,	"Delete NRB Review Section from TS"
94-53-0,	"Delete NRB Audit Section from TS"

Supporting Information for Changes - 8 PAGES

PECO Energy Company, licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, requests that the Technical Specifications (TS) contained in Appendix A to the Operating License be amended, as proposed herein, to revise TS Section 6.0, "Administrative Controls," to 1) change organization position titles and change the Plant Operations Review Committee (PORC) composition description; 2) change the minimum shift crew composition; 3) delete redundant and/or relocate existing independent technical review requirements from TS; 4) delete Nuclear Review Board (NRB) review requirements from TS; and 5) delete NRB audit requirements from TS, prior to January 3, 1995.

Discussion and Description of the Proposed Changes

TS CP 93-12-0

TS Change Request 93-12-0 involves revising TS Section 6.0, "Administrative Controls," to reflect the position titles used as a result of PECO Energy's implementation of the Nuclear Effectiveness and Efficiency Design Study (NEEDS) recommendations. These position titles describe essentially equivalent management and supervisory positions in the LGS organization that were changed as a result of implementing the NEEDS recommendations.

This proposed TS change also describes changes to TS Section 6.5.1.2 to eliminate the specific position titles for the Plant Operations and Review Committee (PORC) in order to allow the Plant Manager to appoint any appropriately qualified member of the plant staff as a PORC member. A description of the proposed position title changes, and a description of the proposed PORC composition is provided below.

Title Changes

<u>Existing TS Organization</u>	<u>Proposed TS Organization</u>
Superintendent - Operations	Senior Manager - Operations
Asst. Superintendent Operations	(Position Eliminated) Duties Assumed by the Senior Manager - Operations and/or Operations Manager holding an SRO
Superintendent - Technical	Director - Site Engineering
Technical Engineer	Sr. Manager - Plant Engineering
Superintendent-ISEG	Manager - ISE
Senior Health Physicist	Manager - Radiation Protection
Shift Superintendent	Shift Manager
Executive Vice President	Senior Vice President and Chief Nuclear Officer
Manager - Nuclear Quality Assurance	Director - Nuclear Quality Assurance
Responsible Superintendent	Responsible Director or Manager

Proposed PORC Composition
Description

The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas.

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Experience Assessment

Members shall meet the requirements of ANSI/ANSI 3.1-1978, Section 4.7 for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairman of the PORC shall be drawn from PORC members and appointed in writing by the Plant Manager.

TSCR 94-46-0

TS Change Request 94-46-0 involves revising TS Section 6.2.2, "Unit Staff," to reflect changes in the shift crew composition. Specifically, this proposed TS change 1) adds a third licensed Senior Reactor Operator (SRO) to shift crew, 2) changes the position title of the lead on-shift supervising SRO, and 3) clarifies who may fill the Shift Technical Advisor (STA) position.

The minimum shift crew currently required by TS is comprised of a Shift Superintendent or a Shift Supervisor (i.e., Shift Supervision (SS)) and one (1) SRO. This proposed TS change will revise the TS (i.e., TS Table 6.2.2-1) to include a Shift Manager (formerly Shift Supervision (SS)) and two (2) SROs. This proposed TS change also includes minor revisions to the table notes to reflect the changes in the shift crew composition. In addition, the table note describing who may fill the Shift Technical Advisor (STA) position is being clarified. Currently, the note states that a qualified on-shift Superintendent, Shift Supervisor, or other SRO may fill the STA position. The note is being revised to indicate that the STA position may be filled by one of the qualified on-shift SROs.

TSCR 94-51-0, 94-52-0, and 94-53-0

The proposed changes also include the deletion of redundant and/or relocate existing independent technical review and, Nuclear Review Board review and audit requirements from TS that are and/or will be contained in the Updated Final Safety Analysis Report (UFSAR).

Specifically, TS Change Request 94-51-0 involves the deletion of requirements associated with the Independent Safety Engineering Group (ISEG) function (TS Sections 6.2.3.1 through 6.2.3.3) that are repetitively addressed in UFSAR Section 13.4.5, and relocation of the balance of requirements (TS Section 6.2.3.4) to UFSAR Section 13.4.5. The result will be that the content of TS Section 6.2.3 will be deleted, and UFSAR Section 13.4.5 will contain the independent technical review. Similarly, TS Change Request 94-52-0, and 94-53-0, involve the deletion of requirements associated with the Nuclear Review Board (NRB) Review and Audit details (TS Sections 6.5.2.7 and 6.5.2.8) that are repetitively addressed in UFSAR Sections 13.4.3 and 13.4.4. The result will be that the content of TS Sections 6.5.2.7 and 6.5.2.8 will be deleted, and UFSAR Sections 13.4.3 and 13.4.4 will contain the details of NRB reviews and audits.

Safety Assessment

TSCR 93-12-0

The proposed changes described in TS Change Request No. 93-12-0 involve revising organization position titles in TS Section 6.0, "Administrative Controls," in order to accurately reflect the LGS organizational structure that resulted from implementing the Nuclear Efficiency and Effectiveness Design Study (NEEDS) recommendations. This proposed TS change does not involve any physical modifications to plant structures, systems, or components (SSC). These new position titles describe essentially equivalent management and supervisory positions in the LGS organization that existed prior to implementing NEEDS. Individuals filling these positions will continue to meet the recommendations specified in ANSI/ANS 3.1-1978, "Selection, Qualification and Training of Personnel in Nuclear Power Plants," as required by TS Section 6.3.1. The proposed TS changes will maintain the organizational and management elements that are necessary to ensure safe operation of LGS, Units 1 and 2. These organizational and management elements include the following.

- 1) The establishment and documentation of clear lines of authority, responsibility, and communication between the highest management levels and all operating organizational positions.
- 2) Staffing of all management, supervisory, and technical positions with personnel with appropriate and sufficient education, training, and experience. Staffing with personnel, with the appropriate qualifications, is demonstrated by meeting the guidance specified in ANSI/ANS 3.1-1978.
- 3) Management and corporate oversight is maintained since the site Vice President is designated as a corporate position that has the responsibility for overall nuclear plant safety.

This proposed TS change eliminates the designation of PORC members by specific position titles, and allows the Plant Manager to appoint any appropriately qualified member of the plant staff as a PORC member. PORC members will still be required to meet the requirements of Section 4.7 of ANSI/ANS 3.1-1978, "Selection, Qualification and Training of Personnel for Nuclear Power Plants." The quorum of the PORC will remain the same and consist of the PORC Chairman or his designated alternative and four members including not more than two alternates. This proposed TS change will not degrade the effectiveness of PORC.

Furthermore, one of the NEEDS recommendations proposed that the Senior Manager - Operations in the post NEEDS organization assume the duties of both the Superintendent - Operations and the Assistant Superintendent - Operations and that the Assistant Superintendent - Operations position be eliminated. Currently, the TS stipulates the Assistant Superintendent - Operations as a position whose incumbent may be required to hold a Senior Reactor Operator (SRO) license. The current LGS Operations organization management structure is comprised of the Senior Manager - Operations and two (2) Operations Managers. In order to comply with the requirements specified in TS 6.2.2.g, one of these individuals will be required to hold an SRO license. Therefore, in the event the Senior Manager - Operations does not hold an SRO license, then an Operations Manager must hold an SRO license. This individual will 1) be qualified to fill the Senior Manager - Operations position, 2) have the same management authority over the licensed operators as the Senior Manager - Operations, and 3) by being designated by Administrative procedures assures that there is always an individual holding a current SRO license in one of the Operations management positions.

TSCR 94-46-0

The proposed changes described in TS Change Request 94-46-0 involve revising the TS to reflect a change in the minimum shift crew composition. Adding an additional SRO to the shift crew as proposed, will improve the ability of the shift crew to 1) adequately operate the facility, 2) respond in the event of an accident condition, and 3) implement applicable plant procedures.

The minimum shift crew composition requirement is established in 10CFR50.54m, and is included in the Standard TS. The original LGS, Units 1 and 2, TS were issued consistent with these requirements (i.e., one (1) SS and one (1) SRO per shift) and included the STA as an additional on-shift position. However, by letter dated November 15, 1993, the NRC issued Facility Operating License Amendment Nos. 64 and 29 for LGS Units 1 and 2, respectively. These amendments permitted the STA position to be filled by the on-shift Shift Superintendent, Shift Supervisor, or other SRO provided the individual met the 1985 NRC Policy Statement on Engineering expertise on Shift. The on-shift crew composition required in procedure A-7 was then revised to include three (3) SROs consisting of one (1) Shift Superintendent, one (1) Shift Supervisor, and one (1) Shift Supervisor who also meets the qualifications of the STA position (called the SRO/STA). Although the TS as revised in November 1993 did require the minimum on-shift crew composition to include one (1) Shift Superintendent or Shift Supervisor, an additional SRO, and an individual who meets the qualification requirements of an STA, one of the two on-shift SROs could satisfy this qualification requirement. As a result, the minimum on-shift crew composition could be met with only two (2) qualified individuals. LGS did not implement this interpretation and the actual on-shift crew composition was intentionally changed to three (3) SROs including an SRO/STA qualified individual.

This proposed TS change revises the TS to include a Shift Manager (formerly Shift Supervision) and two (2) SROs. The Shift Manager (SM) is responsible for the control room command function and is supported by the SROs. In the absence of the SM from the control room, one of the SROs is designated to assume the control room command function. This proposed TS change does not involve any physical changes to plant SSC.

TSCR 94-51-0, 94-52-0, and 94-53-0

The proposed changes to delete redundant and/or relocate existing independent technical review and, Nuclear Review Board review and audit requirements from TS that are and/or will be contained in the LGS UFSAR are in accordance with NUREG-1432 "Standard Technical Specifications for General Electric Plants, BWR/4." No commitments are proposed for addition or deletion under this change. The NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published in the Federal Register, July 22, 1993 (58 FR 39132), provides a set of four criteria and states that Limiting Conditions for Operation which do not meet the four criteria may be proposed for removal from TS. In accordance with the policy these proposed changes were evaluated and it has been concluded that the affected TS Sections are not used for, nor capable of, detecting or indicating in the control room, a significant abnormal degradation of the reactor coolant boundary; are not process variables (nor do they monitor a process variable), design features, or operating restrictions that are initial conditions of a Design Basis Accident (DBA) or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; are not structures, systems, or components that are part of the primary success path which functions or actuates to mitigate a DBA or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; and are not structures, systems or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. Finally, the requirements described in the affected TS sections will be maintained in accordance to 10 CFR 50.59 or 10 CFR 50.54(a) as appropriate.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the Limerick Generating Station (LGS), Unit 1 and Unit 2, Technical Specifications (TS), which will revise organization position titles, Plant Operations Review Committee (PORC) composition description, and eliminate the Assistant Superintendent-Operations position; increase the minimum shift crew composition; and delete redundant and/or relocate existing independent technical review and, Nuclear Review Board review and audit requirements from Technical Specifications that are and/or will be contained in the Updated Final Safety Analysis Report (UFSAR), do not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

1. The proposed Technical Specifications changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS changes to revise the organization position titles, PORC composition description, and eliminate the Assistant Superintendent - Operations position do not involve any physical modifications to plant structures, systems, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes to position titles will not change the requirements for the qualifications and training of personnel in any management or supervisory position. Personnel will continue to meet the guidance specified in ANSI/ANS 3.1-1978 as required by Technical Specification 6.3.1. The probability of occurrence of an accident is based in part on: the training and qualifications of the personnel filling key plant management and supervisory positions; clear lines of authority, responsibility and communication; and, adequate management and corporate oversight of plant performance and activities. The proposed TS changes do not change any of these management and organizational elements.

Allowing the Plant Manager to designate appropriately qualified, trained and experienced members of the LGS staff as members of the PORC, as proposed, will not degrade the effectiveness of the PORC. The qualifications, training and experience level of the PORC will meet the requirements listed in ANSI/ANS 3.1-1978, and the required PORC quorum (including the use of alternates) will not be affected.

Elimination of the position of Assistant Superintendent - Operations eliminates a level of supervision between the Plant Manager and the Shift Managers. The Shift Managers, who hold SRO licenses, will report directly to the Senior Manager - Operations. Other organizational changes within the Operations group (i.e., establishment of the positions of Manager - Operations Services and Manager - Operations Support) will ensure that the Senior Manager - Operations has sufficient time to properly supervise and monitor on-shift performance. The Senior Manager -Operations and/or an Operations Manager will be required to hold a Senior Reactor Operator (SRO) license. Individuals filling these positions will satisfy the applicable training, qualifications, and experience requirements of ANSI/ANS 3.1-1978.

The consequences of an accident could be affected by the qualifications and training of plant management and supervisory personnel. However, the proposed changes do not change the qualifications and training of personnel in any management or supervisory position. Personnel will continue to meet the criteria specified in ANSI/ANS 3.1-1978 as required by TS 6.3.1.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS changes to increase the minimum shift crew composition do not involve any physical changes to plant SSC. The probability of the occurrence of an accident is based in part on the operating crew and their ability to safely operate the plant. The increase in the minimum on-

shift crew composition and the associated changes improves the capability of the on-shift crew to safely operate the plant and SSC, thereby reducing the probability of a situation that could result in an accident. The increase in the minimum on-shift crew composition will improve the manner in which the SSC are operated, maintained, tested, and inspected.

The consequences of an accident could be affected by an operating error. However, the proposed TS changes increase the number of licensed operators required to be on-shift, and therefore, increase the capability of the on-shift crew to properly operate the facility and to implement the appropriate emergency procedures to reduce the consequences of an accident.

The proposed changes will also delete redundant and/or relocate existing independent technical review and, Nuclear Review Board review and audit requirements from TS that are and/or will be contained in the LGS UFSAR. Removal of redundant/relocation of existing requirements does not affect any equipment important to safety, or involve any physical modifications to plant SSC, therefore, is not associated with an accident initiator or accident mitigator and can not affect the probability of occurrence of an accident or increase the consequences of an accident. The licensee controlled UFSAR containing the requirements will be maintained using the provisions of 10 CFR 50.59, or 10 CFR 50.54(a), as appropriate, and are subject to the change control process in the Administrative Controls Section (6.0) of the Technical Specifications. Since future changes to related licensee-controlled documents will be evaluated per 10 CFR 50.59 or 10 CFR 50.54(a), no increase (significant or insignificant) in the probability or consequences of an accident previously evaluated will be allowed.

Therefore, these proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS changes to revise the organization position titles, PORC composition description, and eliminate the Assistant Superintendent - Operations position do not involve any physical modifications to plant structures, systems, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes to position titles will not change the requirements for the qualifications and training of personnel in any management or supervisory position. Personnel will continue to meet the guidance specified in ANSI/ANS 3.1-1978 as required by Technical Specification 6.3.1. Therefore, these proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes to the on-shift crew composition can not create the possibility of a new or different type of accident than previously evaluated in the SAR since implementation of the changes will not involve any physical changes to the plant SSC. The increase in the minimum on-shift crew composition increases the ability of the operating crew to ensure that the SSC are properly operated, maintained, tested and inspected. An increase in the required number of licensed operators on each shift improves the ability of the crew to adequately operate the facility, to respond to accident conditions, and to implement applicable plant procedures. Therefore, these proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes will also delete redundant and/or relocate existing independent technical review and, Nuclear Review Board review and audit requirements from TS that are and/or will be contained in the UFSAR. The changes will not alter the plant configuration (no new or different type of equipment will be installed) or create changes in methods governing normal plant operation that will introduce new failure modes. These changes will not impose different requirements and proper control of information will be maintained. These changes will not alter assumptions made in the safety analysis and licensing basis. Therefore, these changes will not create the possibility of a new

or different kind of accident from any accident previously evaluated.

3. The proposed TS changes do not involve a significant reduction in a margin of safety.

The proposed TS changes to revise the organization position titles, PORC composition description, and eliminate the Assistant Superintendent - Operations position, do not reduce the margin of safety because positions with equivalent authority and responsibility are established and the new positions have equivalent requirements for education, experience and training. Allowing the Plant Manager to designate appropriately qualified, trained and experienced members of the LGS staff as members of the PORC will not degrade the effectiveness of the PORC because the qualifications, training and experience level of the PORC will meet the requirements listed in ANSI/ANS 3.1-1978 and the required PORC quorum (including the use of alternates) will not be affected. Elimination of the position of Assistant Superintendent - Operations eliminates a level of supervision between the Plant Manager and the Shift Managers. If the Senior Manager - Operations does not hold an SRO license, then an Operations Manager must hold an SRO license. This individual will 1) be qualified to fill the Senior Manager - Operations position, 2) have the same management authority over the licensed operators as the Senior Manager - Operations, and 3) by being designated by Administrative procedures assures that there is always an individual holding a current SRO license in one of the Operations management positions. Other organizational changes (i.e., establishment of the positions of Manager - Operations Services and Manager - Operations Support), will ensure that the Senior Manager - Operations has sufficient time to properly supervise and monitor on-shift performance. Therefore, these changes do not involve a significant reduction in a margin of safety.

The proposed changes to the on-shift crew composition increases the number of licensed SROs per shift to be one (1) above the minimum number required by the regulations. Additionally, the title changes are consistent with the organization and reporting relationships discussed in the regulation and the LGS Updated Final Safety Analysis Report (UFSAR). The Shift Manager holds a SRO license for both units and is assigned responsibility for overall plant operation at all times when there is fuel in any unit. The other SROs on the shift report to the Shift Manager and at least one (1) of the SRO licensed individuals is in the Main Control Room when either unit is in an operating mode other than cold shutdown or refuel. The increase in the minimum on-shift crew composition and the associated changes improves the capability of the on-shift crew to safely operate the plant and SSC. Therefore, these changes do not involve a significant reduction in a margin of safety.

The proposed changes will also delete redundant and/or relocate existing independent technical review and, Nuclear Review Board review and audit requirements from TS that are and/or will be contained in the LGS UFSAR. The changes will not reduce the margin of safety since they have no impact on any safety analysis assumptions. In addition, any future changes to the UFSAR will be evaluated per the requirements of 10 CFR 50.59 or 10 CFR 50.54(a), as appropriate. Therefore, these changes will not involve a significant reduction in a margin of safety.

The existing requirement for NRC review and approval of revisions, in accordance with 10 CFR 50.90, to these TS details and requirements proposed for relocation, does not have a specific margin of safety upon which to evaluate. However, since the proposed changes to delete redundant and/or relocate requirements are consistent with the BWR Standard Technical Specifications (NUREG-1433) and the four criteria set forth in the NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," and since the change controls for proposed relocated details and requirements provide an equivalent level of regulatory authority, revising the TS to reflect the approved level of detail and requirements ensures no reduction in the margin of safety.

Information Supporting an Environmental Assessment

An Environmental Assessment is not required for the Technical Specifications changes proposed by these

Change Requests because the requested changes to the Limerick Generating Station, Units 1 and 2, TS conform to the criteria for "actions eligible for categorical exclusion," as specified in 10 CFR 51.22(c)(9). The requested changes will have no impact on the environment. The proposed TS changes do not involve a Significant Hazards Consideration as discussed in the preceding safety assessment section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluent that may be released off-site. In addition, the proposed TS changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications, and have concluded that they do not involve an unreviewed safety question.

ATTACHMENT 2

LIMERICK GENERATING STATION
UNIT 1 AND UNIT 2

Docket Nos.

50-352

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License Nos.

NPF-39

NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST NOS.

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager 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 Manager, 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, Limerick Generating Station shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

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

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organizational 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 Limerick Quality Assurance Program.
- b. The Plant Manager 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.
- c. The Vice President, Limerick Generating Station 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 to 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.

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- 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 OPERATIONAL CONDITION 1, 2, or 3, at least one licensed Senior Operator shall be in the control room;
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- 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 on site at all times*. The fire brigade shall not include the Shift Manager, the Shift Technical Advisor, nor the two 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;
- 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).

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 unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major unit 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.
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.

*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.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures 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 Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The Sr. Manager - Operations or the Operations Manager shall hold a Senior Reactor Operator License. |

TABLE 6.2.2-1
MINIMUM SHIFT CREW COMPOSITION
TWO UNITS WITH A COMMON CONTROL ROOM

WITH UNIT 2 IN CONDITION 4 OR 5 OR DEFUELED		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 OR 5
SM	1*	1*
SRO	2*	2*
RO	2	1
NLO	2	2**
STA	1***	None

WITH UNIT 2 IN CONDITION 1, 2, OR 3		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
SM	1*	1*
SRO	2*	2*
RO	2**	1
NLO	2**	1
STA	1*,***	None

TABLE NOTATIONS

- * Individual(s) may fill the same position on Unit 2.
- ** One of the two required individuals may fill the same position on Unit 2.
- ***The STA position may be filled by an on-shift SM or SRO provided the individual meets the 1985 NRC Policy Statement on Engineering Expertise on Shift.
- SM - Shift Manager 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.
- NLO - Non-licensed operator properly qualified to support the unit to which assigned.
- STA - Shift Technical Advisor

Except for the Shift Manager (SM), the shift crew composition may be one less than the minimum requirements of Table 6.2.2-1 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 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an upcoming shift crewman being late or absent.

During any absence of the Shift Manager (SM) from the control room while the unit is in OPERATIONAL CONDITION 1, 2, or 3, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Manager (SM) from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

ADMINISTRATIVE CONTROLS

6.2.3 - DELETED. The information from this section is located in the UFSAR.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Experience Assessment

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairman of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- c. Provide written notification within 24 hours to the Vice President, Limerick Generating Station and the Nuclear Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President, Limerick Generating Station, Plant Manager, and the Nuclear Review Board.

6.5.2 NUCLEAR REVIEW BOARD (NRB)

FUNCTION

6.5.2.1 The NRB 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,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The NRB shall report to and advise the Senior Vice President and Chief Nuclear Officer on those areas of responsibility pertaining to NRB Review and Audits.

COMPOSITION

6.5.2.2 The Chairman, members, and alternates of the NRB shall be appointed in writing by the Senior Vice President and Chief Nuclear Officer, and shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of 5 years technical experience, of which a minimum of 3 years shall be in one or more areas given in Specification 6.5.2.1. The NRB shall be composed of no less than eight and no more than 12 members.

The members and alternates of the NRB will be competent in the area of Quality Assurance practice and cognizant of the Quality Assurance requirements of 10 CFR Part 50, Appendix B. Additionally, they will be cognizant of the corporate Quality Assurance Program and will have the corporate Quality Assurance organization available to them.

ADMINISTRATIVE CONTROLS

ALTERNATES

6.5.2.3 All alternates shall be appointed in writing by the NRB Chairman to serve on a continuing basis. They shall receive correspondence sent to NRB members with regard to NRB activities and shall be invited to attend all NRB meetings. Alternates shall vote only in the absence of those members for whom they are the alternate.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NRB Chairman to provide expert advice to the NRB.

MEETING FREQUENCY

6.5.2.5 The NRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the NRB necessary for the performance of the NRB review and audit functions of these Technical Specifications shall consist of the Chairman or a designated alternate and at least four but not less than one half of the voting NRB members. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

6.5.2.7 - DELETED. The information from this section is located in the UFSAR.

AUDITS

6.5.2.8 - DELETED. The information from this section is located in the UFSAR.

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ADMINISTRATIVE CONTROLS

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following each meeting.
- b. Reports of Reviews shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following completion of the review.
- c. Audit reports shall be forwarded to the Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Director or Manager or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

ADMINISTRATIVE CONTROLS

6.5.3.3 If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Director or Manager shall render a determination in writing of whether or not the new program, procedure, or change thereto involves an unreviewed safety question (USQ), and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change.

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Director or Manager shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

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, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. 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. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- 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 Supplement 1 to NUREG-0737.
- 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 environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be reviewed periodically as set forth in Administrative Procedures.

6.8.3 Temporary 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 Operator license on the unit affected; and
- c. The change is documented, reviewed by an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that procedure within 14 days of implementation.

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager 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 Manager, 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, Limerick Generating Station shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

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

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organizational positions. These relationships shall be documented and updated, as appropriate, in the form of organizational 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 Limerick Quality Assurance Program.
- b. The Plant Manager 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.
- c. The Vice President, Limerick Generating Station 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 to 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.

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- 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 OPERATIONAL CONDITION 1, 2, or 3, at least one licensed Senior Operator shall be in the control room;
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- 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 on site at all times*. The fire brigade shall not include the Shift Manager, the Shift Technical Advisor, nor the two 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;
- 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).

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 unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major unit 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.

*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.

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF (Continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures 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 Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The Sr. Manager - Operations or the Operations Manager shall hold a Senior Reactor Operator License.

TABLE 6.2.2-1

MINIMUM SHIFT CREW COMPOSITION

TWO UNITS WITH A COMMON CONTROL ROOM

WITH UNIT 1 IN CONDITION 4 OR 5 OR DEFUELED		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 OR 5
SM	1*	1*
SRO	2*	2*
RO	2	1
NLO	2	2**
STA	1***	None

WITH UNIT 1 IN CONDITION 1, 2, OR 3		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
SM	1*	1*
SRO	2*	2*
RO	2**	1
NLO	2**	1
STA	1*,***	None

TABLE NOTATIONS

- * Individual(s) may fill the same position on Unit 1.
 ** One of the two required individuals may fill the same position on Unit 1.
 ***The STA position may be filled by an on-shift SM or SRO provided the individual meets the 1985 NRC Policy Statement on Engineering Expertise on Shift.
 SM - Shift Manager with a Senior Operator license on Unit 2.
 SRO - Individual with a Senior Operator license on Unit 2.
 RO - Individual with an Operator license on Unit 2.
 NLO - Non-licensed operator properly qualified to support the unit to which assigned.
 STA - Shift Technical Advisor

Except for the Shift Manager (SM), the shift crew composition may be one less than the minimum requirements of Table 6.2.2-1 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 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an upcoming shift crewman being late or absent.

During any absence of the Shift Manager (SM) from the control room while the unit is in OPERATIONAL CONDITION 1, 2, or 3, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Manager (SM) from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

ADMINISTRATIVE CONTROLS

6.2.3 DELETED. The information from this section is located in the UFSAR.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Experience Assessment

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairman of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- c. Provide written notification within 24 hours to the Vice President, Limerick Generating Station and the Nuclear Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President, Limerick Generating Station, Plant Manager, and the Nuclear Review Board.

6.5.2 NUCLEAR REVIEW BOARD (NRB)

FUNCTION

6.5.2.1 The NRB 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,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The NRB shall report to and advise the Senior Vice President and Chief Nuclear Officer on those areas of responsibility pertaining to NRB Review and Audits.

COMPOSITION

6.5.2.2 The Chairman, members, and alternates of the NRB shall be appointed in writing by the Senior Vice President and Chief Nuclear Officer, and shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of 5 years technical experience, of which a minimum of 3 years shall be in one or more areas given in Specification 6.5.2.1. The NRB shall be composed of no less than eight and no more than 12 members.

The members and alternates of the NRB will be competent in the area of Quality Assurance practice and cognizant of the Quality Assurance requirements of 10 CFR Part 50, Appendix B. Additionally, they will be cognizant of the corporate Quality Assurance Program and will have the corporate Quality Assurance organization available to them.

ADMINISTRATIVE CONTROLS

ALTERNATES

6.5.2.3 All alternates shall be appointed in writing by the NRB Chairman to serve on a continuing basis. They shall receive correspondence sent to NRB members with regard to NRB activities and shall be invited to attend all NRB meetings. Alternates shall vote only in the absence of those members for whom they are the alternate.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NRB Chairman to provide expert advice to the NRB.

MEETING FREQUENCY

6.5.2.5 The NRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the NRB necessary for the performance of the NRB review and audit functions of these Technical Specifications shall consist of the Chairman or a designated alternate and at least four but not less than one half of the voting NRB members. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

6.5.2.7 DELETED. The information from this section is located in the UFSAR.

AUDITS

6.5.2.8 DELETED. The information from this section is located in the UFSAR.

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ADMINISTRATIVE CONTROLS

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following each meeting.
- b. Reports of Reviews shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following completion of the review.
- c. Audit reports shall be forwarded to the Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Director or Manager or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

ADMINISTRATIVE CONTROLS

6.5.3.3 If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Director or Manager shall render a determination in writing of whether or not the new program, procedure, or change thereto involves an unreviewed safety question (USQ) and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change.

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Director or Manager shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

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, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. 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. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- 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 Supplement 1 to NUREG-0737.
- 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 environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be reviewed periodically as set forth in Administrative Procedures.

6.8.3 Temporary 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 Operator license on the unit affected; and
- c. The change is documented, reviewed by an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that procedure within 14 days of implementation.



Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29551

Robinson File No.: 13510
Serial: RNP/94-1927

NOV 18 1994

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
SOFTWARE ERROR NOTIFICATIONS - GTSTRUDL

- References:
1. NRC letter, Mr. Leif J. Norrholm, NRC, to Mr. R. H. Mugno, EBASCO Services, Inc., "Disposition of Error Notices Received from Boeing Computer Services," Docket No. 99900505, dated December 16, 1993.
 2. Letter, C.T. Brandt, Raytheon Engineers & Constructors, EBASCO Division, to Mr. Leif J. Norrholm, NRC, "Disposition of Error Notices Received from Boeing Computer Services," dated February 24, 1994.

Gentlemen:

This letter is in response to an October 6, 1994, verbal request from Mr. Walter Haass of your staff regarding computer program error notices. On December 16, 1993, NRC requested by Reference 1 that EBASCO Services provide a summary of evaluations and responses to error notices received from Boeing Computer Services (BCS) regarding computer programs, such as GTSTRUDL, ANSYS, and NUPIPE-II. Reference 2 from Raytheon responded to that request and identified the Carolina Power & Light (CP&L) Company's H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 as the sole user of software provided by BCS. Specifically, Raytheon identified the use of GTSTRUDL during the program to address NRC Bulletin (NRCB) 79-14, "Seismic Analysis for As-Built Safety-Related Piping," for the HBRSEP Steam Generator replacement. CP&L has reviewed the records regarding the use of GTSTRUDL during the NRCB 79-14 program for the HBRSEP Steam Generator replacement and did not identify an error notice that would have required a 10 CFR 21 notification. Our records are available for your examination in our offices at One Hannover Square, Raleigh, NC.

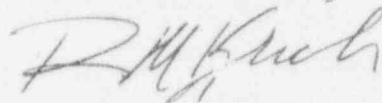
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CP&L has a proceduralized program for handling vendor error notices on licensed software which includes an evaluation of the error for 10 CFR 21 applicability. The computer programs noted above are included in that program. Error notices associated with licensed safety-related, quality-assured software are routinely evaluated for impact on associated design calculations and for 10 CFR 21 applicability. If an error notice is deemed reportable in accordance with 10 CFR 21, the CP&L corporate guideline would be implemented and a report provided to the NRC in accordance with 10 CFR 21 reporting requirements.

Questions regarding this matter may be referred to Mr. K. R. Jury at (803) 383-1363.

Very truly yours,



R. M. Krich
Manager - Regulatory Affairs

- c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
- Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
- Mr. Leif J. Norrholm, USNRC, Chief, Vendor Inspection Branch
- Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP