

ATTACHMENT 2

**PROPOSED
TECHNICAL SPECIFICATION
CHANGES**

INDEX

ADMINISTRATIVE CONTROLS

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DEFINITIONS

FREQUENCY NOTATION

- 1.14 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

IDENTIFIED LEAKAGE

- 1.15 IDENTIFIED LEAKAGE shall be:

- a. Leakage into collection systems, such as pump seal or valve packing leaks, that is captured and conducted to a sump or collecting tank, or.
- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of the leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE.

ISOLATION SYSTEM RESPONSE TIME

- 1.16 The ISOLATION SYSTEM RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation actuation setpoint at the channel sensor until the isolation valves travel to their required positions. Times shall include diesel generator starting and sequence loading delays where applicable. The response time may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

LIMITING CONTROL ROD PATTERN

- 1.17 A LIMITING CONTROL ROD PATTERN shall be a pattern which results in the core being on a thermal hydraulic limit, i.e., operating on a limiting value for APLHGR, LHGR, or MCPR.

LINEAR HEAT GENERATION RATE

- 1.18 LINEAR HEAT GENERATION RATE (LHGR) shall be the heat generation per unit length of fuel rod. It is the integral of the heat flux over the heat transfer area associated with the unit length.

LOGIC SYSTEM FUNCTIONAL TEST

- 1.19 A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all logic components, i.e., all relays and contacts, all trip units, solid state logic elements, etc., of a logic circuit, from sensor through and including the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by any series of sequential, overlapping or total system steps such that the entire logic system is tested.

MAXIMUM FRACTION OF LIMITING POWER DENSITY

- 1.20 The MAXIMUM FRACTION OF LIMITING POWER DENSITY (MFLPD) shall be the highest value of the FLPD which exists in the core.

MEMBER(S) OF THE PUBLIC

- 1.21 MEMBER(S) OF THE PUBLIC shall be an individual in a controlled or UNRESTRICTED AREA. However, an individual is not a MEMBER OF THE PUBLIC during any period in which the individual receives an occupational dose.

DEFINITIONS

MINIMUM CRITICAL POWER RATIO

- 1.22 The MINIMUM CRITICAL POWER RATIO (MCPR) shall be the smallest CPR which exists in the core.

OFF-GAS TREATMENT SYSTEM

- 1.23 An OFF-GAS TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting reactor coolant system offgases from the reactor coolant and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

OFFSITE DOSE CALCULATION MANUAL

- 1.24 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.5 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Semi-annual Radioactive Effluent Release Reports required by Specifications 6.9.1.7 and 6.9.1.8.

OPERABLE - OPERABILITY

- 1.25 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL CONDITION - CONDITION

- 1.26 An OPERATIONAL CONDITION, i.e., CONDITION, shall be any one inclusive combination of mode switch position and average reactor coolant temperature as specified in Table 1.2.

PHYSICS TESTS

- 1.27 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and (1) described in Chapter 14 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

- 1.28 PRESSURE BOUNDARY LEAKAGE shall be leakage through a nonisolable fault in a reactor coolant system component body, pipe wall, or vessel wall.

PRIMARY CONTAINMENT INTEGRITY

- 1.29 PRIMARY CONTAINMENT INTEGRITY shall exist when:
- a. All primary containment penetrations required to be closed during accident conditions are either:
 1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

plotted using an "Accept" line which follows the equation $N = 55(1 + C/2)$. Each snubber point should be plotted as soon as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type have been tested.

The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure as far as practical that they are representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same locations as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional testing results shall be reviewed at the time to determine if additional samples should be limited to the type of snubber which has failed the functional testing.

f. Functional Test Acceptance Criteria

The snubber functional test shall verify that:

- 1) Activation (restraining action) is achieved within the specified range in both tension and compression;
- 2) Snubber bleed, or release rate where required, is present in both tension and compression, within the specified range;
- 3) For mechanical snubbers, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel; and
- 4) For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.

Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional testing either fails to lock up or fails to move, i.e., frozen-in-place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.5e. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and the freedom-of-motion test must have been performed within 12 months before being installed in the unit.

i. Snubber Seal Replacement Program

The service life of hydraulic and mechanical snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established based on engineering information and shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained.

in accordance with Specification 6.10.3.

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SECTION 6.0
ADMINISTRATIVE CONTROLS

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager* shall be responsible for overall unit safe operation and shall delegate in writing the succession to this responsibility during his absence. The Plant Manager shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

6.1.2 The 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 Senior Vice President - Nuclear Generation* 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 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 Updated Final Safety Analysis Report.
- b. The Senior Vice President - Nuclear Generation 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 of the plant to ensure nuclear safety.
- c. 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.

* An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

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 Radiation Protection Technician* shall be on site when fuel is in the reactor. The Radiation Protection Technician position may be unfilled 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;
- 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. DELETED

- ~~DELETED~~
- 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 physics personnel, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have the personnel work a nominal 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.

* An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

ADMINISTRATIVE CONTROLS

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 his designee, 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 should be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- g. The Operations Engineer, Nuclear Shift Supervisor, and Nuclear Assistant Shift Supervisor shall hold a Senior Reactor Operator license. The Nuclear Supervising Operator shall hold a Reactor Operator or Senior Reactor Operator license.

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TABLE 6.2.2-1
MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
NSS	1	1
NASS	1	None
NSO	2	1
NPPO/NAPPO	2	1
STA	1	None

TABLE NOTATION

NSS - Nuclear Shift Supervisor with a Senior Operator license
NASS - Nuclear Assistant Shift Supervisor with a Senior Operator license
NSO - Nuclear Supervising Operator with an Operator license
NPPO/NAPPO - Nuclear Power Plant Operator or Nuclear Assistant Power Plant Operator
STA - Shift Technical Advisor

Except for the Nuclear Shift Supervisor, 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 oncoming shift crewman being late or absent.

During any absence of the Nuclear Shift Supervisor from the control room while the unit is in OPERATIONAL CONDITION 1, 2 or 3, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Nuclear Shift Supervisor 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} INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

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

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five dedicated, full-time engineers located onsite, each with a bachelor's degree in engineering or related science and at least two years professional level experience in his field, at least one year of which experience shall be in the nuclear field.

RESPONSIBILITIES

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

AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the Vice President Nuclear Engineering and Services.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Nuclear Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

*Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

DELETED

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Superintendent - Radiation Protection* or his designee who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 29, 1980 NRC letter to all licensees.

6.4 TRAINING

DELETED

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Director, Nuclear Training,* shall meet or exceed the requirements and recommendations of Section 5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 29, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

DELETED

6.5.1 ONSITE REVIEW ORGANIZATION (OSRO)

FUNCTION

6.5.1.1 The OSRO shall function to advise the Plant Manager on all matters related to nuclear safety as described in Specification 6.5.1.6

COMPOSITION

6.5.1.2 The OSRO chairman shall be the Plant Manager and the membership shall be composed of a minimum of 6 but not more than 11 plant management representatives whose responsibilities include the functional areas of: operations, maintenance, radiation protection, engineering/technical support and quality assurance. All members shall be appointed in writing by the OSRO Chairman. The qualifications of each OSRO member shall meet or exceed the requirements and recommendations of Section 4.2 or 4.3 of ANSI N18.1-1971.

ALTERNATES

6.5.1.3 The Chairman may designate in writing other members who may serve as the Vice Chairman of the OSRO. Alternates may be designated for specific OSRO members. No more than two alternates shall participate as voting members in OSRO activities at any one time. All alternate members shall be appointed in writing by the OSRO Chairman.

* An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

6.5.1.4 The OSRO shall meet at least once per calendar month and as convened by the OSRO Chairman or a Vice Chairman.

QUORUM

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

RESPONSIBILITIES

6.5.1.6 The OSRO shall be responsible for:

- a. Review of all Plant Administrative Procedures and changes thereto;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. Review of the safety evaluations for plant procedures and changes thereto completed under the provisions of 10 CFR 50.59;
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Senior Vice President - Nuclear Generation and to the Nuclear Safety Review Group;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Nuclear Safety Review Group;
- j. Review of the Security Plan;
- k. Review of the Emergency Plan;

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Senior Vice President - Nuclear Generation and to the Nuclear Safety Review Group; and

- m. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and major modifications to the Radwaste Treatment Systems.

- n. Review of the Fire Protection Program.

6.5.1.7 The OSRO shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing to the Nuclear Safety Review Group with regard to whether or not each item considered under Specification 6.5.1.6a. through f. constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President - Nuclear Generation and the Nuclear Safety Review Group of disagreement between the OSRO 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 OSRO shall maintain written minutes of each OSRO meeting that, at a minimum, document the results of all OSRO activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Senior Vice President - Nuclear Generation and the Nuclear Safety Review Group.

6.5.2 NUCLEAR SAFETY REVIEW GROUP (NSRG)

FUNCTION

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

The NSRG shall report to and advise the Senior Vice President - Nuclear Generation on those areas of responsibility in Specifications 6.5.2.7 and 6.5.2.8.

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.2 The Senior Vice President - Nuclear Generation shall appoint at least nine members to the NSRG and shall designate from this membership a Chairman and at least one Vice Chairman. The membership shall collectively possess experience and competence to provide independent review and audit in the areas listed in Section 6.5.2.1. The Chairman and Vice Chairman shall have nuclear background in engineering or operations and shall be capable of determining when to call in experts to assist the NSRG review of complex problems. All members shall have at least a bachelor's degree in engineering or related sciences or at least 10 years of responsible power plant experience of which a minimum of 3 years shall be nuclear power plant experience. The Chairman shall have at least 10 years of professional level management experience in the power field and each of the other members shall have at least 5 years of cumulative professional level experience in one or more of the fields listed in Section 6.5.2.1.

ALTERNATES

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

CONSULTANTS

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

MEETING FREQUENCY

6.5.2.5 The NSRG shall meet at least once per 6 months.

QUORUM

6.5.2.6 The quorum of the NSRG necessary for the performance of the NSRG review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least one half of the remaining NSRG members of whom two may be alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.2.7 The NSRG shall be responsible for the review of 6.5.2.7.a and shall review 6.5.2.7.b through i:

- a. The safety evaluations for (1) changes to procedures, equipment, facilities or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;

ADMINISTRATIVE CONTROLS

REVIEW (Continued)

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the OSRO.

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRG. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation, at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least every third year;

ADMINISTRATIVE CONTROLS

AUDITS (Continued)

- g. Any other area of unit operation considered appropriate by the NSRG or the Senior Vice President - Nuclear Generation.
- h. The radiological environmental monitoring program and the results thereof at least once per 12 months;
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months; and
- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

RECORDS

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

- a. Minutes of each NSRG meeting shall be prepared, approved, and forwarded to the Senior Vice President - Nuclear Generation within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Senior Vice President - Nuclear Generation within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Senior Vice President - Nuclear Generation and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.2 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Procedures required by Technical Specification 6.8, and other procedures which affect plant nuclear safety as determined by the Plant Manager, and changes thereto, shall be prepared by a qualified individual/organization.

ADMINISTRATIVE CONTROLS

6.5.3.2 Each procedure or procedure change prepared in accordance with 6.5.3.1 above and not reviewed in accordance with Section 6.5.1.6 shall be reviewed for technical adequacy by a qualified individual other than the individual that prepared the procedure or change thereto. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review(s) shall be performed by personnel of the appropriate discipline.

6.5.3.3 Each procedure required by Specification 6.8.1.h through j, or changes thereto, shall be reviewed by the Superintendent-Radiation Protection or his designee. The Environmental Program Coordinator* will review any changes pertaining to 6.8.1.j. These reviews may be performed in lieu of, or in addition to, those required by item 6.5.3.2 above.

SAFETY EVALUATIONS

6.5.3.4 When required by 10 CFR 50.59, a safety evaluation to determine whether or not an unreviewed safety question is involved shall be included in the review. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to approval of the procedure or procedure change.

QUALIFICATIONS

6.5.3.5 Individuals performing the reviews and evaluations in accordance with 6.5.3.2 through 6.5.3.4 above shall meet or exceed the qualifications stated in Sections 4.2 or 4.4 of ANSI N18.1-1971 for the appropriate discipline, and shall be members of the plant staff previously designated in writing by the Plant Manager.

RECORDS

6.5.3.6 Written records of reviews and evaluations performed in accordance with items 6.5.3.2 through 6.5.3.4 above, including recommendations for approval or disapproval, shall be prepared and maintained.

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 OSRD, and the results of this review shall be submitted to the NSRG and the Senior Vice President - Nuclear Generation.

* An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

ADMINISTRATIVE CONTROLS

6.7 SAFETY LIMIT VIOLATION

Nuclear Safety Review Group (NSRG)

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

- Onsite Review Organization (OSRO)*
- The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Senior Vice President - Nuclear Generation and the ~~NSRG~~ shall be notified within 24 hours.
 - A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ~~OSRO~~. 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.
 - The Safety Limit Violation Report shall be submitted to the Commission, the NSRG, and the Senior Vice President - Nuclear Generation within 14 days of the violation.
 - 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:

- The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- The applicable procedures required to implement the Fermi 2 commitments made in response to the requirements of NUREG-0737.
- Refueling operations.
- Surveillance and test activities of safety-related equipment.
- ~~DELETED~~
~~Security Plan implementation.~~
- ~~DELETED~~
~~Emergency Plan implementation.~~
- Fire Protection Program implementation.
- PROCESS CONTROL PROGRAM implementation.
- OFFSITE DOSE CALCULATION MANUAL implementation.
- Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21 Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

~~DELETED~~
6.8.2 Each plant administrative procedure, and changes thereto, shall be reviewed in accordance with Specification 6.5.1.6, and approved by the Plant Manager prior to implementation, and shall be reviewed periodically thereafter as set forth in administrative procedures.

~~DELETED~~
6.8.3 Each plant procedure required by Specification 6.8.1, other than administrative procedures, and changes thereto, shall be reviewed in accordance with 6.8.3, and approved by the Plant Manager prior to implementation and shall be reviewed periodically thereafter as set forth in administrative procedures. The Plant Manager may delegate approval authority in writing for specific types of procedures to a management representative responsible for the functional area.

~~DELETED~~
6.8.4 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 Fermi 2; and
- c. The change is documented, and reviewed and approved in accordance with either 6.8.2 or 6.8.3 above, as appropriate, within 14 days of implementation.

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

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the HPCI, CS, RHR, RCIC, reactor water sampling, containment sampling, reactor water cleanup, combustible gas control, control rod drive discharge headers, and standby gas treatment systems. The program shall include the following:

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

~~DELETED~~
b. In-Plant Radiation Monitoring

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

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

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

c. Post-accident Sampling

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

The program shall include the following:

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

d. High Density Spent Fuel Racks

A program which will assure that any unanticipated degradation of the high density spent fuel racks will be detected and will not compromise the integrity of the racks.

e. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in 10 CFR Part 20.1001-20.2402, Appendix B, Table 2, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the SITE BOUNDARY to the following:
 - a. For noble gases: less than or equal to 500 mrem/yr to the total body and less than or equal to 3000 mrem/yr to the skin and
 - b. For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: less than or equal to 1500 mrem/yr to any organ.
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 10) Limitations on venting and purging of the Mark I containment through the Standby Gas Treatment System or the Reactor Building Ventilation System to maintain releases as low as reasonably achievable,
- 11) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

DELETED

f. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and,
- 3) Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

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

STARTUP REPORT

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

6.9.1.2 The startup report shall address each of the tests identified in Subsection 14.1.4.8 of the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to

ADMINISTRATIVE CONTROLS

STARTUP REPORT (Continued)

obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

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

ANNUAL REPORTS

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

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of plant, utility, and other personnel (including contractors), for whom monitoring was required, receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions,* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket or thermoluminescent dosimeters (TLD) dosimeters or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions; and
- b. Documentation of all challenges to main steam line safety/relief valves, and
- c. A summary of ECCS outage data including:
 1. ECCS outage dates and duration of outages,
 2. Cause of each ECCS outage,
 3. ECCS systems and components in the outage, and
 4. Corrective action taken.
- d. The reports shall also include the results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.5. The following information shall be included:

*This tabulation supplements the requirements of §20.2206 of 10 CFR Part 20.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

- (1) reactor power history starting 48 hours prior to the first sample in which the limit was exceeded;
- (2) results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit (each result should include date and time of sampling and the radioiodine concentrations);
- (3) clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded;
- (4) graph of the I-131 and one other radioiodine isotope concentrations in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and
- (5) the time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.7 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted ~~within 90 days after January 1~~ of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

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SPECIAL REPORTS

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

CORE OPERATING LIMITS REPORT

6.9.3 Selected cycle specific core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT (COLR) before each reload cycle or any remaining part of a reload cycle. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in General Electric Company reports NEDE-24011-P-A and NEDE-23785-1-PA. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met. The COLR, including any mid-cycle revisions or supplement thereto, shall be submitted upon issuance to the NRC Document Control Desk, with copies to the Regional Administrator and Resident Inspector prior to use.

6.10 RECORD RETENTION

DELETED

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

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

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

6.10 RECORD RETENTION - (continued)

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of doses received by all individuals for whom monitoring was required.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the OSRO and the NSRG.
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.5 including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- n. Records of reviews performed for changes to the OFFSITE DOSE CALCULATION MANUAL and PROCESS CONTROL PROGRAM.
- o. Records of radioactive shipments.

ADMINISTRATIVE CONTROLS

6.11 RADIATION PROTECTION PROGRAM DELETED

~~6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.~~

6.12 HIGH RADIATION AREA DELETED

~~6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.1601 of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:~~

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

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ADMINISTRATIVE CONTROLS

HIGH RADIATION AREA (Continued)

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- c. A radiation protection qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Radiation Protection Supervisor** in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to individuals with radiation levels such that an individual could receive in 1 hour a dose equivalent greater than 1000 mrem but less than 500 rads at one meter from sources of radioactivity shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Nuclear Shift Supervisor on duty and/or the radiation protection supervision. Doors shall remain locked except during periods of access by individuals under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to individuals with radiation levels such that a major portion of the individual's body could receive in 1 hour a dose in excess of 1000 mrem* but less than 500 rads at one meter from sources of radioactivity that are located within large areas, such as the containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote (such as use of closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

DELETED

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

6.13.2 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:

*Measurement made at 30 centimeters from source of radioactivity.

** An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

6.13 PROCESS CONTROL PROGRAM (PCP) (Continued)

DELETED

- 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the OSRO and the approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

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

6.14.2 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained, ~~as required by Specification 6.10.3a.~~ This documentation shall contain:
- 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after ~~review and acceptance by the OSRO and the~~ approval of the Plant Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

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DEFINITIONS

MINIMUM CRITICAL POWER RATIO

- 1.22 The MINIMUM CRITICAL POWER RATIO (MCPR) shall be the smallest CPR which exists in the core.

OFF-GAS TREATMENT SYSTEM

- 1.23 An OFF-GAS TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting reactor coolant system offgases from the reactor coolant and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

OFFSITE DOSE CALCULATION MANUAL

- 1.24 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls required by Section 6.8.5 and Radiological Environmental Monitoring Programs and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.7 and 6.9.1.8.

OPERABLE - OPERABILITY

- 1.25 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL CONDITION - CONDITION

- 1.26 An OPERATIONAL CONDITION, i.e., CONDITION, shall be any one inclusive combination of mode switch position and average reactor coolant temperature as specified in Table 1.2.

PHYSICS TESTS

- 1.27 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and (1) described in Chapter 14 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

- 1.28 PRESSURE BOUNDARY LEAKAGE shall be leakage through a nonisolable fault in a reactor coolant system component body, pipe wall, or vessel wall.

PRIMARY CONTAINMENT INTEGRITY

- 1.29 PRIMARY CONTAINMENT INTEGRITY shall exist when:
- a. All primary containment penetrations required to be closed during accident conditions are either:
 1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or

PLANT SYSTEMS
SURVEILLANCE REQUIREMENTS (Continued)

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional testing either fails to lock up or fails to move, i.e., frozen-in-place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.5e. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and the freedom-of-motion test must have been performed within 12 months before being installed in the unit.

i. Snubber Seal Replacement Program

The service life of hydraulic and mechanical snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established based on engineering information and shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained.

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 Radiation Protection Technician* shall be on site when fuel is in the reactor. The Radiation Protection Technician position may be unfilled 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;
- 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. DELETED
- f. DELETED

* An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- g. The Operations Engineer, Nuclear Shift Supervisor, and Nuclear Assistant Shift Supervisor, shall hold a Senior Reactor Operator license. The Nuclear Supervising Operator shall hold a Reactor Operator or Senior Reactor Operator license.

ADMINISTRATIVE CONTROLS

6.2.3 DELETED

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Nuclear Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

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ADMINISTRATIVE CONTROLS

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.

ADMINISTRATIVE CONTROLS

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 Senior Vice President - Nuclear Generation and the Nuclear Safety Review Group (NSRG) shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Onsite Review Organization (OSRO). 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 NSRG, and the Senior Vice President - Nuclear Generation within 14 days of the violation.
- 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 Fermi 2 commitments made in response to the requirements of NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. DELETED
- f. DELETED
- 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 in Regulatory Guide 1.21 Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

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

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the HPCI, CS, RHR, RCIC, reactor water sampling, containment sampling, reactor water cleanup, combustible gas control, control rod drive discharge headers, and standby gas treatment systems. The program shall include the following:

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

b. DELETED

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

c. Post-accident Sampling

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

The program shall include the following:

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

d. High Density Spent Fuel Racks

A program which will assure that any unanticipated degradation of the high density spent fuel racks will be detected and will not compromise the integrity of the racks.

e. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in 10 CFR Part 20.1001-20.2402, Appendix B, Table 2, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

f. DELETED

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

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

STARTUP REPORT

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

6.9.1.2 The startup report shall address each of the tests identified in Subsection 14.1.4.8 of the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

- (1) reactor power history starting 48 hours prior to the first sample in which the limit was exceeded;
- (2) results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit (each result should include date and time of sampling and the radioiodine concentrations);
- (3) clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded;
- (4) graph of the I-131 and one other radioiodine isotope concentrations in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and
- (5) the time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.7 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted prior to May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

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SPECIAL REPORTS

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

CORE OPERATING LIMITS REPORT

6.9.3 Selected cycle specific core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT (COLR) before each reload cycle or any remaining part of a reload cycle. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in General Electric Company reports NEDE-24011-P-A and NEDE-23785-1-PA. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met. The COLR, including any mid-cycle revisions or supplement thereto, shall be submitted upon issuance to the NRC Document Control Desk, with copies to the Regional Administrator and Resident Inspector prior to use.

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6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

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

6.14.2 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after approval of the Plant Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.