

EXISTING TECH SPEC

TS 6.0

'ADMINISTRATIVE CONTROLS'

QUAD-CITIES
DPR-29

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, INVESTIGATION, AND AUDIT

- A. 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.
1. 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 department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3, Organization, Authority, Activities, Section 6, "Interdepartmental Relationships" ^{and}.
 2. The Station 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.
 3. The Senior Vice President-Nuclear Operations shall have the 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.
 4. The individuals who train the operating staff and those who ^{perform} ~~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.
- B. Deleted.
- C. The shift manning for the station shall be as shown in Figure 6.1-3. The Operating Assistant Superintendent, Operating Engineer, Shift Engineers, and Shift Foremen shall have a Senior Operator's License. The Fuel Handling Foreman has a limited Senior Operator's License. The Vice President-CBWR Operations on the corporate level has responsibility for the Fire Protection Program. The Maintenance Assistant Superintendent will be responsible for implementation of the Fire Protection Program. ~~A fire brigade of at least 5 members shall be maintained on-site at all times. This excludes the shift crew necessary for safe shutdown of the plant, and any personnel required for other essential functions during a fire emergency.~~

DUAD-CITIES

PR-29

- D. Qualifications of the station management and operating staff, excluding the Health Physics Services Supervisor and the Radiation Protection and Chemistry Technicians, shall meet minimum acceptable levels as described in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel", dated March 8, 1971. The Health Physics Services Supervisor or the Lead Health Physicist shall meet the requirements of radiation protection manager of Regulatory Guide 1.8. The individual filling the position of Technical Superintendent shall meet the minimum acceptable level for "Technical Manager" as described in Section 4.2.4 of ANSI N18.1-1971. The Shift Control Room Engineer shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

The Radiation Protection Technicians shall have successfully completed the established Radiation Protection Technician training program. The Chemistry Technicians shall have successfully completed the established Chemistry Technician training program. Both shall have at least a total of one year of general power plant, chemical, or radiation protection experience, or equivalent training. In addition, the Radiation Protection Technicians shall meet the criteria for "Individuals Qualified in Radiation Protection Procedures", as described in the D.L. Ziemann (NRC) letter to R. L. Bolger (CECo.) dated March 15, 1977. The Radiation Protection or Chemistry Technician training programs consists of the following:

1. Satisfactory completion of an academic program. Topics of these courses include mathematics, nuclear physics, radioactive decay, chemistry, sampling techniques, reactor coolant parameters, radiation exposure, shielding, biological effects of radiation exposure, radiation survey techniques, personnel monitoring, and emergency procedures, as appropriate for their area.
2. Satisfactory performance on a comprehensive examination following completion of academic training.
3. On-Shift training under the supervision of a qualified Radiation Protection or Chemistry Technician.

- E. Retraining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel", dated March 8, 1971.

A training program for the fire brigade shall be maintained under the direction of the Station Fire Marshal and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975 except that training sessions shall be at least quarterly.

- F. Retraining for licensed operators, senior operators, and senior operators (limited) shall be conducted at intervals not exceeding 2 years.

QUAD-CITIES
DPR-29

G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

1. The Superintendent of the Offsite Review and Investigative Function shall be appointed by the Manager of Quality Assurance/Nuclear Safety (QA/NS). The Corporate Audit Function shall be the responsibility of the Manager of QA/NS and shall be independent of operations.

The Manager of QA/NS reports directly to the Chief Executive Officer and has the responsibility to set Corporate Policy for both the areas of Quality Assurance and Nuclear Safety. Policy is promulgated through a central policy committee directed by the Manager of QA/NS. The Manager of QA/NS has the responsibility for the performance of periodic audits of each nuclear station and corporate departments to determine that QA/NS policy is being carried out.

a. Offsite Review and Investigative Function

The Superintendent of the Offsite Review and Investigative Function shall: (1) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (2) select each participant for this function, (3) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (4) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (5) approve and report in a timely manner all findings of noncompliance with NRC requirements to the Station Manager, Vice President-BWR Operations, Manager of QA/NS, Assistant Vice President (AVP) Quality Programs and Assessment, and the Senior Vice President-Nuclear Operations. During periods when the Superintendent of Offsite Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate, who satisfies the formal training and experience requirements for the Superintendent of the Offsite Review and Investigative Function. The responsibilities of the personnel performing this function are stated below. The Offsite Review and Investigative Function shall review:

- (1) The safety evaluations for (1) changes to procedures, equipment, or systems as described in the safety analysis report 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. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of QA/NS.

QUAD-CITIES
DPR-29

- (2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
- (3) Proposed tests or experiments which involve an unreviewed safety question ^{as} defined in 10 CFR 50.59.
- (4) Proposed changes in Technical Specification NRC operating licenses.
- (5) Noncompliance with NRC requirements ^{or} of internal procedures ^{or} instructions causing nuclear safety significance.
- (6) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the Onsite Review and Investigative Function.
- (7) ~~Repetitive events.~~
- (8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- (9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such change.
- (10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, Vice President BWR Operations, and AVP Quality Programs and Assessment.

b. Station Audit Function

The Station Audit Function shall be the responsibility of the AVP Quality Programs and Assessment independent of BWR Operations. Such responsibility is delegated to the Nuclear Quality Programs Manager.

The Nuclear Quality Programs Manager shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within a period of 2 years or less as designated below.

- (1) ~~Audit of the~~ conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.

QUAD-CITIES
DPR-29

- (2) ~~Audit of the~~ Adherence to procedures, training and qualification of the station staff at least once per year.
- (3) ~~Audit of the~~ Results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety at least once per 6 months.
- (4) ~~Audit of the~~ Performance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B" 10 CFR 50.
- (5) ~~Audit of the~~ Facility Emergency Plan and implementing procedures at least once per year.
- (6) ~~Audit of the~~ Facility Security Plan and implementing procedures at least once per year.
- (7) ~~Audit~~ Onsite and offsite reviews.
- (8) ~~Audit~~ The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- (9) The radiological environmental monitoring program and the results thereof at least once per 12 months.
- (10) The ODCM and implementing procedures at least once per 24 months.
- (11) The PCP and implementing procedures for solidification of radioactive waste at least once per 24 months.
- (12) Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station Manager, Manager of QA/NS, AVP Quality Programs and Assessment, Vice President BWR Operations, the Senior Vice President-Nuclear Operations, and the Chief Operating Officer.

c. Authority

The Manager of QA/NS reports to the Chief Executive Officer. The Manager of QA/NS has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.

QUAD-CITIES
DPR-29

The AVP Quality Programs and Assessment reports to the Senior Vice President-Nuclear Operations. The AVP Quality Programs and Assessment has the authority to recommend unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions. All such disagreements shall be reported immediately to the Manager of QA/NS and the Chief Operating Officer.

d. Records

- (1) Reviews, audits, and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b.
- (2) Copies of documentation, reports, and correspondence shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for the offsite review and investigative function described in Specifications 6.1.G.1.a. Those procedures shall cover the following:

- (1) Content and method of submission of presentations to the Superintendent of the Offsite Review and Investigative Function.
- (2) Use of committees and consultants.
- (3) Review and approval.
- (4) Detailed listing of items to be reviewed.
- (5) Method of (1) appointing personnel, (2) performing reviews and investigations, (3) reporting findings and recommendations of reviews and investigations, (4) approving reports, and (5) distributing reports.
- (6) Determining satisfactory completion of action required based on approved findings and recommendations reported by personnel performing the review and investigative function.

f. Personnel

- 1) The persons, including consultants, performing the review and investigative function, in addition to the Superintendent of the Offsite Review and Investigative Function, shall have expertise in one or more of the following

QUAD-CITIES
DPR-29

disciplines as appropriate for the subject or subjects being reviewed and investigated:

- a) nuclear power plant technology,
- b) reactor operations,
- c) utility operations,
- d) power plant design,
- e) reactor engineering,
- f) radiological safety,
- g) reactor safety analysis,
- h) instrumentation and control,
- i) metallurgy,
- j) any other appropriate disciplines required by unique characteristics of the facility.

2) Individuals performing the Review and Investigative Function shall possess a minimum formal training and experience as listed below for each discipline.

a) Nuclear Power Plant Technology

Engineering graduate or equivalent with 5 years experience in the nuclear power field design and/or operations.

b) Reactor Operations

Engineering graduate or equivalent with 5 years experience in nuclear power plant operations.

c) Utility Operations

Engineering graduate or equivalent with at least 5 years of experience in utility operation and/or engineering.

d) Power Plant Design

Engineering graduate or equivalent with at least 5 years of experience in power plant design and/or operation.

e) Reactor Engineering

Engineering graduate or equivalent. In addition, at least 5 years of experience in nuclear plant engineering, operation, and/or graduate work in nuclear engineering or equivalent in reactor physics is required.

f) Radiological Safety

Engineering graduate or equivalent with at least 5 years of experience in radiation control and safety.

QUAD-CITIES
DPR-29

g) Reactor Safety Analysis

Engineering graduate or equivalent, with at least 5 years of experience in nuclear engineering.

h) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

i) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

- 3) The Superintendent of the Offsite Review and Investigative Function shall have experience and training which satisfy ANSI N18.1-1971 requirements for plant managers.

2. The Onsite Review and Investigative Function shall be supervised by the Station Manager.

a. Onsite Review and Investigative Function

The Station Manager shall: (1) provide direction for the Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as a senior participant to provide appropriate directions; (2) approve participants for this function; (3) assure that a complement of more than one participant who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive interdisciplinary review coverage under this function; (4) independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (5) report all findings of noncompliance with NRC requirements, and provide recommendations; and (6) submit to the Offsite Review and Investigative Function concurrence in a timely manner, those items described in Specification 6.1.G.1.a which have been approved by the Onsite Review and Investigative Function. The responsibilities of the personnel performing this function are stated below:

- 1) Review of (1) procedures required by Specification 6.2 and changes thereto and (2) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
- 2) Review of all proposed tests and experiments that affect nuclear safety.

QUAD-CITIES
DPR-29

- 3) Review of all proposed changes to the Technical Specifications.
- 4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- 5) Investigation of all noncompliance with NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence.
- 6) Review of facility operations to detect potential safety hazards.
- 7) Performance of special reviews and investigations and reports thereon as requested by the Superintendent of the Offsite Review and Investigative Function.
- 8) Review of the Station Security Plan and shall submit recommended changes to the Director of Corporate Security and the AVP Quality Programs and Assessment in lieu of the distribution in accordance with 6.1.G 2.8(1).
- 9) Review of the Emergency Plan and station implementing procedures and identification of recommended changes.
- 10) Review of ~~Reportable Events~~ and actions taken to prevent recurrence.
- 11) Review of any unplanned on-site release of radioactive material to the environs, including the preparation and forwarding of reports covering evaluation recommendations and disposition of the corrective action to prevent recurrence to the Vice President ~~CBWR~~ Operations and to the Superintendent of the Offsite Review and Investigative Function.
- 12) Review of changes to the LCP and ODCM, and major changes to the radwaste treatment systems.

b. Authority

The Technical Staff Supervisor is responsible to the Station Manager and shall make recommendations in a timely manner in all areas of review, investigations, and quality control phases of plant maintenance, operation, and administrative procedures relating to facility operations and shall have the authority to request the action necessary to ensure

13) Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Offsite Review and Investigative Function

QUAD-CITIES
DPR-29

compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station Manager shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the Vice President BWR Operations and the Superintendent of the Offsite Review and Investigative Function.

c. Records

- 1) Reports, reviews, investigations, and recommendations prepared and performed for specification 6.1.G.2.a shall be documented with copies to the Vice President BWR Operations, the Superintendent of the Offsite Review and Investigative Function, the Station Manager, and the AVP Quality Programs and Assessment.
- 2) Copies of all records and documentation shall be kept on file at the station.

d. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the Onsite Review and Investigative function. These procedures shall include the following:

- 1) Content and method of submission and presentation to the Station Manager, Vice President BWR Operations, and the Superintendent of the Offsite Review and Investigative Function.
- 2) Use of committees when necessary.
- 3) Review and approval.
- 4) Detailed listing of items to be reviewed.
- 5) Procedures for administration of the quality control activities.
- 6) Assignment of responsibilities.

e. Personnel

- 1) The personnel performing the Onsite Review and Investigative Function, in addition to the Station Manager, shall consist of persons having expertise in:
 - a) nuclear power plant technology,
 - b) reactor operations,
 - c) reactor engineering,

QUAD-CITIES
DPR-29

- d) radiological safety and ^{chemistry} ~~chemist~~,
- e) instrumentation and control, and
- f) mechanical and electric systems.

- 2) Personnel performing the Onsite Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1 1971, Sections 4.2 and 4.4.

H. Fire Protection Program

An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.

An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

MINIMUM SHIFT MANNING CHART#

License Category	CONDITION OF ONE UNIT (No Fuel in Second Unit)		
	Initial Fuel Loading or During Refueling	Cold Shutdown or Refueling Shutdown	Above Cold Shutdown
Senior Operator License	2	1	2
Operator License	2	2	3
Rad. Prot. Man	1	1	1
Non-Licensed	(As Required)	1	2
Shift Technical Advisor	None Required	None Required	1

License Category	CONDITION OF SECOND UNIT (One Unit at Hot Shutdown or at Power)		
	Initial Fuel Loading or During Refueling	Cold Shutdown or Refueling Shutdown	Above Cold Shutdown
Senior* Operator License	2	2	2
Operator* License	3	3	3
Rad. Prot. Man	1	1	1
Non-Licensed	3+ (As Required)	3	4
Shift Technical Advisor	1	1	1

License Category	CONDITION OF SECOND UNIT (One Unit at Cold Shutdown or Refueling Shutdown)		
	Initial Fuel Loading or During Refueling	Cold Shutdown or Refueling Shutdown	Above Cold Shutdown
Senior* Operator License	2	1	2
Operator* License	3	2	3
Rad. Prot. Man	1	1	1
Non-Licensed	3+ (As Required)	3	3
Shift Technical Advisor	None Required	None Required	1

* Assumes each individual is licensed on each facility. During initial fuel loading or during refueling, one senior engineer (limited license) will supervise fuel handling.

Shift crew composition may be less than the minimum requirements 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 Figure 6.1-3.

Figure 6.1-3

6.2 PLANT OPERATING PROCEDURES AND PROGRAMS

- A. Detailed written procedures, including applicable checkoff lists covering items listed below shall be prepared, approved, and adhered to.
1. Normal startup, operation, and shutdown of the reactor, and other systems and components involving nuclear safety of the facility.
 2. Refueling operations.
 3. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including responses to alarms, suspected primary system leaks, and abnormal reactivity changes.
 4. Emergency conditions involving potential or actual release of radioactivity - "Generating Station Emergency Plan" and station emergency and abnormal procedures.
 5. Instrumentation operation which could have an effect on the safety of the facility.
 6. Preventive and corrective maintenance operations which could have an effect on the safety of the facility.
 7. Surveillance and testing requirements.
 8. Tests and experiments.
 9. Procedure to ensure safe shutdown of the plant.
 10. Station Security Plan and implementation procedures.
 11. Fire Protection Program implementation.
 12. ODCM implementation.
 13. PCP implementation.
 14. Working hours of the Shift Engineer, Shift Control Room Engineer, Shift Foreman, and the Nuclear Station Operator job classifications such that the heavy use of overtime is not routinely required.

QUAD-CITIES
DPR-29

6.2 PLANT OPERATING PROCEDURES AND PROGRAMS

- B. Radiation control procedures shall be maintained, made available to all station personnel, and adhered to. The procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.
- C. 1. Procedures for items identified in Specification 6.2.A and 6.2.B and any changes to such procedures shall be reviewed and approved by the Technical Staff Supervisor, an Assistant Superintendent or the Technical Superintendent, and department head responsible for the activity performed. At least one person approving each of the above procedures shall hold a valid senior operator's license. In addition, these procedures and changes thereto must have authorization by the Station Manager before being implemented.
2. Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Maintenance Assistance Superintendent where the written authority has been provided by the Station Manager. The "Maintenance Modification Procedure" utilized for safety-related work shall be so approved only if procedures referenced in the "Maintenance Modification Procedure" have been approved as required by 6.2.A. Procedures which do not fall within the requirement of 6.2.A or 6.2.B may be approved by the Department Heads.
- D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:
1. The intent of the original procedure is not altered.
2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license on the unit affected.
3. The change is documented, reviewed ^{by Onsite} ~~on the On-Site~~ Review and Investigative Function, and approved by the Station Manager within 14 days of implementation.
- E. Drills of the emergency procedures described in Specification 6.2.A shall be conducted in accordance with the GSEP manual.

F. & G. INSERT ATTACHED INFORMATION

F. 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 10 CFR Part 20, Appendix B, Table II, Column 2.
3. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM.
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 to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1,

INSERT FOR TECHNICAL SPECIFICATION PAGE 6.2-2 (Continued)

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 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.

G. 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 a 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.

6.3 REPORTABLE EVENT ACTION

- A. The following actions shall be taken for Reportable Events:
1. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 of 10 CFR Part 50.
 2. Each Reportable Event shall be reviewed by the ^{onsite} ~~On-Site~~ Review Committee, and the results of this review shall be submitted to the ~~Off-Site~~ Review and Investigative Function and to the Vice President ~~of~~ BWR Operations.

Offsite

QUAD-CITIES
DPR-29

6.4 ACTION TO BE TAKEN IN THE EVENT A SAFETY LIMIT IS EXCEEDED

If a ~~safety limit~~ is exceeded, the reactor shall be shut down immediately, and reactor operation shall not be resumed until authorized by the NRC. The conditions of shutdown shall be promptly reported to the Vice President of BWR Operations or his designated alternate. The incident shall be reviewed pursuant to Specifications 6.1.G.1.a and 6.1.G.2.a and a separate report for each occurrence shall be prepared in accordance with Specification 6.3.A.1.

6.5 PLANT OPERATING RECORDS

- A. Records and/or logs relative to the following items shall be kept in a manner convenient for review and shall be retained for at least 5 years:
1. Records of normal plant operation, including power levels and periods of operation at each power level;
 2. Records of principal maintenance ~~and~~ activities, including inspection and repair, regarding principal items of equipment pertaining to nuclear safety;
 3. Records and reports of ~~irradiation events~~ and ~~other events~~ occurrences;
 4. Records and periodic checks, inspection and/or calibrations performed to verify that the surveillance requirements (see Section 4 of these specifications) are being met (all equipment failing to meet surveillance requirements and the corrective action taken shall be recorded);
 5. Records of changes made to the equipment or reviews of tests and experiments to comply with 10 CFR 50.59;
 6. Records of radioactive shipments;
 7. Records of physic tests and other tests pertaining to nuclear safety;
 8. Records of changes to operating procedures;
 9. Shift engineers' logs; and
 10. Byproduct material inventory records and source leak test results.
- B. Records and/or logs relative to the following items shall be recorded in a manner convenient for review and shall be retained for the life of the plant:
1. Substitution or replacement of principal items of equipment pertaining to nuclear safety;
 2. Changes made to the plant as it is described in the SAR;
 3. Records of new and spent fuel inventory and assembly histories;
 4. Updated, corrected, and as-built drawings of the plant;
 5. Records of plant radiation and contamination surveys;
 6. Records of offsite environmental monitoring surveys;

QUAD-CITIES
DPR-29

7. Records of radiation exposure for all plant personnel, including all contractors and visitors to the plant, in accordance with 10 CFR 20;
8. Records of radioactivity in liquid and gaseous wastes released to the environment;
9. Records of transient or operational cycling for those components that have been designed to operate safely for a limited number of transient or operational cycles;
10. Records of individual staff members indicating qualifications, experience, training, and retraining;
11. Inservice inspections of the reactor coolant system;
12. Minutes of meetings and results of reviews and audits performed by the offsite and onsite review and audit functions; and
13. Records for Environmental Qualification which are covered under the provisions of paragraph 6.7.
14. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.6 REPORTING REQUIREMENTS

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the ~~administrator of the appropriate Regional Office unless otherwise noted.~~
US Nuclear Regulatory Commission Document Control Desk with copies to the
A. Routine Reports *Regional Office and NRC Resident Inspector.*

1. Startup Report

A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the SAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

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 power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

2. A tabulation shall be submitted on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job function (Note: this tabulation supplements the requirements of Section 20.407 of 10 CFR 20), 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 estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total

QUAD-CITIES
DPR-29

whole body dose received from external sources shall be assigned to specific major work functions.

3. Monthly Operating Report

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management Information and Program Control, U.S. Nuclear Regulatory Commission, Washington, DC 20555, with a copy to the appropriate Regional Office, to arrive no later than the 15th of each month following the calendar month covered by the report. In addition, any changes to the ODCM shall be submitted with the Monthly Operating Report within 90 days of the effective date of the change.

A report of major change to the radioactive waste treatment systems shall be submitted with the Monthly Operating Report for the period in which the evaluation was reviewed and accepted by the onsite review function. If such change is re-evaluated and not installed, notification of cancellation of the change should be provided to the NRC.

4. Core Operating Limits Report

- a. Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:
 - (1) The Rod Withdrawal Block Monitor Upscale Instrumentation Setpoint for Table 3.2-3 of Specification 3.2.C and for Specification 3.6.H.
 - (2) The overall average of the 20% insertion scram time data for Specification 3.3.C.
 - (3) The Average Plant Heat Generation Rate (APLHGR) for Specification 3.5.I.
 - (4) The Limit Heat Generation Rate (LHGR) for Specification 3.5.J.
 - (5) The Minimum Critical Power Ratio (MCPR) for Specification 3.5.K and 3.6.H.
 - (6) The K_{eff} core flow MCPR adjustment factor for Specification 3.5.K.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by NRC in NEDE-24011-P-A, General Electric Standard Application for Reactor Fuel (latest approved revision).

- c. 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.
- d. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

B. Unique Reporting Requirements

1. ~~Radioactive Effluent Release Report (Semi-Annual)~~

~~A semi-annual report shall be submitted to the Commission within 60 days after January 1 and July 1 of each year specifying the quantity of each of the radionuclides released to unrestricted areas in liquid and gaseous effluents during the previous 6 months. The format and content of the report shall be in accordance with Regulatory Guide 1.21 (Revision 1) dated June, 1974. Any changes to the PCP shall be included in this report.~~

2. ~~Environmental Program Data (Annual Report)~~

~~An annual report containing the data taken in the standard radiological monitoring program (Table 4.8-4) shall be submitted prior to May 1 of each year. The content of the report shall include:~~

- a. ~~Results of all environmental measurements summarized in the format of the Regulatory Guide 4.8 Table 1 (December 1975). (Individual sample results will be retained at the Station). In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. Summaries, interpretations, and analysis of trends of the results are to be provided.~~
- b. ~~An assessment of the monitoring results and radiation dose via the principal pathways of exposure resulting from plant emissions of radioactivity including the maximum noble gas gamma and beta air doses in the unrestricted area. The assessment of radiation doses shall be performed in accordance with the Offsite Dose Calculation Manual (ODCM).~~
- c. ~~Results of the census to determine the locations of nearest residences and of nearby animals producing milk for human consumption (Table 4.8-4).~~

Replace
with
attached

1. Semiannual Radioactive Effluent Release Report

The Semiannual Radioactive Effluent Release Report covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The 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. A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station.

2. Annual Radiological Environmental Operating Report

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.

QUAD-CITIES
DPR-29

- d. The reason for the omission if the nearest dairy to the station is not in the monitoring program (Table 4.8-4).
 - e. An annual summary of meteorological conditions concurrent with the releases of gaseous effluents in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.
 - f. The results of the Interlaboratory Comparison Program described in section 3.8.D.7.
 - g. The results of the 40 CFR 190 uranium fuel cycle dose analysis for each calendar year.
 - h. A summary of the monitoring program, including maps showing sampling locations and tables giving distance and direction of sampling locations from the Station.
3. If a confirmed measured radionuclide concentration in an environmental sampling medium averaged over any calendar quarter sampling period exceeds the reporting level given in Table 4.8-5 and if the radioactivity is attributable to plant operation, a written report shall be submitted to the Administrator of the NRC Regional Office, with a copy to the Director, Office of Nuclear Reactor Regulation, within 30 days from the end of the quarter.
- a. When more than one of the radionuclides in Table 4.8-5 are detected in the medium, the reporting level shall have been exceeded if
$$\sum \frac{C_i}{R.L.i} \geq 1$$
where C_i is the average quarterly concentration of the i^{th} radionuclide in the medium and RL is the reporting level of radionuclide i .
 - b. If radionuclides other than those in Table 4.8-5 are detected and are due to plant effluents, a reporting level is exceeded if the potential annual dose to an individual is equal to or greater than the design objective doses of 10 CFR 50, Appendix I.
 - c. This report shall include an evaluation of any release conditions, environmental factors, or other aspects necessary to explain the anomalous effect.

3. Special Reports

Special Reports shall be submitted as indicated in Table 6.6-1.

QUAD-CITIES
DPR-29

TABLE 6.6-1
SPECIAL REPORTS

<u>Area Description</u>	<u>Specification Reference</u>	<u>Submittal Date</u>
a. Secondary containment leak rate test (1)	4.7. A I	Upon completion of each test.
b. Summary status of fuel performance	1.1 Bases	After each refueling outage
c. Materials radiation surveillance specimens	4.6.B. 2 3	After each specimen removal and completion of analyses.
d. Radioactive Source Leak Testing (2)	4.8. F D	Annual report.
e. Special Effluents Reports	3.8.A ODCM 3.8.B 3.8.C 6.6.C.3.	30 days following occurrence.
f. Explosive Gas Mixture - inoperable recombiner	3.8.A	30 days following occurrence

Notes

1. Each integrated leak rate test of the secondary containment shall be the subject of a summary technical report. This report should include data on the wind speed, wind direction, outside and inside temperatures during the test, concurrent reactor building pressure, and emergency ventilation flow rate. The report shall also include analyses and interpretations of those data which demonstrate compliance with the specified leak rate limits.
2. This report is required only if the tests reveal the presence of the 0.005 microcuries or more of removable contamination.

QUAD-CITIES
DPR-29

6.7 ENVIRONMENTAL QUALIFICATION

- A. All safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Assistant of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", December 1979. Copies of these documents are attached to Order for Modification of License DPR-29, dated October 24, 1980.
and DPR-30
- B. Complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

6.8 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Replace
with
attached

A. The ODCM shall describe the methodology and parameters to be used in the calculation of offsite doses due to radioactive gaseous and liquid effluents and in the calculation of gaseous and liquid effluent monitoring instrumentation alarm/trip setpoints consistent with the applicable LCO's contained in these Technical Specifications. Methodologies and calculation procedures acceptable to the Commission are contained in NUREG-0133.

The ODCM shall be submitted to the Commission at the time of proposed Radiological Effluent Technical Specifications and shall be subject to review and approval by the Commission prior to implementation.

B. Licensee initiated changes to the ODCM may be made provided the change:

1. Shall be submitted to the Commission by inclusion in the Monthly Operating Report pursuant to Specification 6.6.A.3. within 90 days of the date the change(s) was made effective and shall contain:

a. Sufficiently detailed information to support the change. Information submitted should consist of a package of those pages of the ODCM to be changed together with appropriate analyses or evaluations justifying the change(s);

b. A determination that the change will not reduce the accuracy of reliability of dose calculations or setpoint determinations; and

c. Documentation of the fact that the change has been reviewed and found acceptable by the onsite review functions.

2. Shall become effective upon review and acceptance by the onsite review function.

INSERT FOR TECHNICAL SPECIFICATION PAGE 6.8-1

A. Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.5.B.14. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 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 calculation.
2. Shall become effective after review and acceptance by the onsite review function and the approval of the Plant Manager.
3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Semiannual 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.

QUAD CITIES
DPR-29

6.9 PROCESS CONTROL PROGRAM (PCP)

Replace
with
attached

- A. The PCP shall contain the sampling, analysis, and formulation determination by which solidification of radioactive wastes from liquid systems is assured.
- B. The PCP shall be approved by the Commission prior to implementation.
- C. Licensee initiated changes may be made to the PCP provided the change:
 - 1. Shall be submitted to the Commission in the Semi-Annual Radioactive Effluent Release Report for the period in which the change was made and shall contain:
 - a. Sufficiently detailed information to support the change;
 - b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. Documentation that the change has been reviewed and found acceptable by the onsite review function.
 - 2. Shall become effective upon review and acceptance by the onsite review function.

INSERT FOR TECHNICAL SPECIFICATION PAGE 6.9-1

A. Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.5.B.14. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - b. 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.
2. Shall become effective after review and acceptance by the onsite review function and the approval of the Plant Manager.

6.10 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS (LIQUID, GASEOUS, SOLID)

- A. Licensee initiated major changes to the radioactive waste systems may be made provided:
1. The change is reported in the Monthly Operating Report for the period in which the evaluation was reviewed by the onsite review function. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - b. Sufficient detailed information to support the reason for the change;
 - c. A detailed description of the equipment, components and process involved and the interfaces with other plant systems;
 - d. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and (or quantity of solid waste that differ from those previously predicted in the license application and amendments);
 - e. A comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste to the actual releases for the period in which the changes were made;
 - f. An estimate of the exposure to plant operating personnel as a result of the change; and
 - g. Documentation of the fact that the change was reviewed and found acceptable by the onsite review function.
 2. The change shall become effective upon review and acceptance by onsite review function.

SIGNIFICANT HAZARDS CONSIDERATIONS
AND
ENVIRONMENTAL ASSESSMENT EVALUATION

PROPOSED TS 6.0

"ADMINISTRATIVE CONTROLS"

EVALUATION FOR SIGNIFICANT HAZARDS CONSIDERATION

PROPOSED SPECIFICATION 6.0

ADMINISTRATIVE CONTROLS

The proposed changes provided in this amendment request are made in order to implement the recommendations of Generic Letters 88-12, 86-10, and 89/01, and other minor changes. These changes have been reviewed by Commonwealth Edison Company and we believe that they do not present a Significant Hazards Consideration. The basis for our determination is documented as follows:

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards consideration. In accordance with the criteria of 10 CFR 50.92(c) a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility, in accordance with the proposed amendment, would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated, because:
 - a. The proposed change to remove the Fire Protection Technical Specifications does not involve a significant increase in the probability or consequences of an accident previously evaluated because the change does not involve a physical modification to the plant, a change to any safety system or a change to any setpoint. The administrative concept of concurrently removing the fire protection requirements from the Technical Specifications and incorporating these elements into the UFSAR and in implementing procedures, does not affect the safety analysis presented in the Quad Cities UFSAR. Adequate programmatic controls are added to Section 6.0 to ensure proper controls are maintained. The changes will not affect the functioning of the fire protection program, which will be maintained pursuant to the operating license. No changes will be made to the program that conflict with the requirements of the operating license.
 - d. The NRC issued Generic Letter 89/01 in order to allow the technical specification provisions for the Radiological Effluent Technical Specifications (RETS) and Process Control Program (PCP) to be relocated to the Administrative Controls section of the technical specifications (programmatic requirements) and to the ODCM or PCP (procedural details). New programmatic controls for radioactive effluents and radiological environmental monitoring are relocated to Section 6.0 of the technical specifications to conform to the regulatory requirements

of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. Other changes to Sections 3.2/4.2 and 3.8/4.8, and described in the proposed changes for those sections, complete the requirements for implementation of the recommendations of GL 89/01. The relocation of the present technical specification requirements and the inclusion of programmatic controls in Section 6.0 are not intended to reduce the level of radiological effluent control. Since the proposed changes to implement GL 89/01 provisions meet NRC requirements and retain adequate programmatic controls for RETS in the technical specifications, the proposed change does involve a significant increase in the probability or consequences of an accident previously evaluated.

- c. The remaining changes for Section 6.0 provide Monthly Operating Report requirements that are consistent with later operating plants. These changes are applicable to Quad Cities and do not involve a significant increase in the probability or consequences of an accident previously evaluated.
- 2) Create the possibility of a new or different kind of accident from any previously evaluated because:
- a. The proposed changes to the Facility Operating License and the Technical Specifications represent an administrative shifting of responsibility for the Fire Protection Program requirements from the Technical Specifications to the UFSAR. The proposed changes do not affect the accident analysis or the operation or function of any safety-related equipment since the Fire Protection Program requirements will continue to be maintained. No new modes of operation are introduced by these proposed changes. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.
 - b. The proposed changes to the technical specifications resulting from the implementation of Generic Letter 89/01 follow NRC guidelines for relocating RETS and PCP procedural requirements to the ODCM and programmatic requirements for the ODCM and CP to Section 6.0 of the technical specifications. Since the present level of radiological effluent monitoring is maintained by the proposed change, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.
 - c. The proposed changes to the Monthly Operating Reporting requirements provide consistency with later operating plants' provisions. The proposed change in frequency of reporting requirements will not create the possibility of a new or different kind of accident from any previously

evaluated.

3) Involve a significant reduction in the margin of safety because:

- a. The deletion of the Fire Protection Technical Specifications and incorporation of these provisions into the UFSAR does not change the level of fire protection in the plant. Additionally, controls added to Section 6.0 of the technical specifications and by the standard license condition and the 10 CFR 50.59 criteria will ensure future changes to the Fire Protection Program are properly evaluated. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.
- b. The proposed implementation of the guidelines of Generic Letter 89/01 retains required RETS and PCP programmatic controls in Section 6.0 of the technical specifications and specific procedural controls in the ODCM and PCP. As such, the present margins of safety are preserved and the changes do not involve a significant reduction in the margin of safety.
- c. The proposed deletion of requirements from the Monthly Operating Reports and retention these reporting requirements in the Semiannual Radioactive Effluent Release Report or in the ODCM or PCP, ensures that changes to the ODCM and major changes to the radioactive waste systems are reported to the NRC in a timely manner. Therefore, the changes do not involve a significant reduction in the margin of safety.

ENVIRONMENTAL ASSESSMENT EVALUATION

PROPOSED SPECIFICATION SECTION 6.0

ADMINISTRATIVE CONTROLS

Commonwealth Edison has evaluated the proposed amendment in accordance with the requirements of 10 CFR 51.71 and has determined that the amendment meets the requirements for categorical exclusion as specified by 10 CFR 51.22(c)(9). Commonwealth Edison has determined that the amendment involves no significant hazards consideration, there are no significant change in the types or significant increase in the amounts of any effluent that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure.

The proposed amendment does not modify the existing facility and does not involve any new operation of the plant. As such, the proposed amendment does not involve any change in the type or significant increases in effluents, or increase individual or cumulative occupational radiation exposure. The proposed amendment to Section 6.0, "Administrative Controls" implements the guidance contained in Generic Letter 89-01 and Generic Letter 88-12 for the removal of the Radiological Effluent Technical Specification and Fire Protection Program, respectively. As such, the amendment does not impact those irreversible consequences beyond those already accepted by the NRC in the Final Environmental Statement.

QC-1 / QC-2 DIFFERENCES

TS 6.0

'ADMINISTRATIVE CONTROLS'

COMPARISON OF UNIT 1 AND UNIT 2 TECHNICAL SPECIFICATIONS
FOR THE
IDENTIFICATION OF TECHNICAL DIFFERENCES

SECTION 6.0

ADMINISTRATIVE CONTROLS

Commonwealth Edison has conducted a comparison review of the Unit 1 and Unit 2 Technical Specifications to identify any technical differences in support of combining the Technical Specifications into one document. The intent of the review was not to identify any differences in presentation style (e.g. table formats, use of capital letters, etc.) or punctuation but rather to identify areas which the Technical Specifications are technically different.

The review of Section 6.0 "Administrative Controls" did not identify any technical differences.

The following administrative differences were identified:

Page 6.1-2

Paragraph D	Unit 1:	Radiation/Protection and Chemistry Technicians
	Unit 2:	Radiation Protection and Chemistry Technicians
Paragraph D.1	Unit 1:	procedures, as appropriate for their area
	Unit 2:	procedures, as appropriate to their area

Page 6.1-3

Paragraph G.1	Unit 1:	of the Manager of QA/NS and shall...
	Unit 2:	of the Manager of Quality Assurance/ Nuclear Safety (QA/NS)
Paragraph G.1.a	Unit 1:	Assessment, and the Senior Vice President-Nuclear Operations,
	Unit 2:	Assessment, and the Senior Vice President of Nuclear Operations

Page 6.1-9

Paragraph b.	Unit 1:	the distribution in accordance with 6.1.G.2.C(1).
	Unit 2:	the distribution in accordance with 6.1.G.2.c.(1).

Page 6.1-10

Paragraph c.1 Unit 1: documented with copies to the Vice
President BWR Operations the
Unit 2: documented with copies to the Vice
President BWR Operations, the

Page 6.2-2

Paragraph C.1 Unit 1: Technical Staff Supervisor, an
Assistant Superintendent or the
Technical
Unit 2: Technical Staff Supervisor, an
Assistant Superintendent or Technical

Page 6.6-1

Paragraph A.1 Unit 1: shall be submitted at least every
three months
Unit 2: shall be submitted at least every
3 months

Paragraph A.2 Unit 1: of station, utility, and
Unit 2: of station utility, and

Page 6.6-4

Paragraph h Unit 1: sampling locations
Unit 2: samplings locations

Page 6.6-5

Note 2 Unit 1: presence of the 0.005 microcuries
Unit 2: presence of 0.005 microcuries

Page 6.9-1

Paragraph C.1 Unit 1: Shall be submitted to the Commission
in the Semi-Annual Radioactive
Effluent
Unit 2: Shall be submitted to the Commission
in the Radioactive Effluent

Paragraph 6.10-1

Paragraph A.2 Unit 1: upon review and acceptance by onsite
Unit 2: upon review and acceptance by by
onsite