

5.0 ADMINISTRATIVE CONTROLS

5.5.3 Fire Protection Inspection

- a. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm. The audit and inspection program responsibility shall rest with the Safety Audit and Review Committee.
- b. An inspection and audit of the fire protection and loss prevention program by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.

5.6 Reportable Occurrence Action

5.6.1 The following action shall be taken in the event of a REPORTABLE OCCURRENCE:

- a. Each Reportable Occurrence requiring 1, 4, or 24 hour notification to the Commission shall be reviewed by the Plant Review Committee and submitted to the Safety Audit and Review Committee and the Section Manager - Operations.

5.7 Safety Limit Violation

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

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The safety limit violation shall be reported to the Section Manager - Operations and to the Safety Audit and Review Committee immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Review Committee. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Safety Audit and Review Committee and the Section Manager - Operations within 10 days of the violation.

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5.8 Procedures

- 5.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the minimum requirements of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33 except as provided in 5.8.2 and 5.8.3 below.
- 5.8.2 Each procedure and administrative policy of 5.8.1 above, and changes thereto, shall be reviewed by the Plant Review Committee and approved by the Manager - Fort Calhoun Station prior to implementation and periodically as set forth in each document.
- 5.8.3 Temporary changes to procedure 5.8.1 above may be made provided:
- a. The intent of the original procedure is not altered.
 - b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
 - c. The change is documented, reviewed by the Plant Review Committee and approved by the Manager - Fort Calhoun Station within 14 days of implementation.
- 5.8.4 Written procedures approved per 5.8.2 above shall be implemented which govern the selection of fuel assemblies to be placed in Region 2 of the spent fuel racks (Technical Specification 2.8(12)). These procedures shall require an independent verification of initial enrichment requirements and fuel burnup calculations for a fuel bundle to assure the "acceptance" criteria for placement in Region 2 are met. This independent verification shall be performed by individuals or groups other than those who performed the initial acceptance criteria assessment, but who may be from the same organization.

5.9 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 Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

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5.9.1 Routine Reports

- a. 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 USAR 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.

- b. Annual Occupational Exposure Report. An annual occupational exposure report should be submitted prior to March 1 of each year. The report shall consist of a tabulation 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

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- (7) Any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made. Such an event may include an onsite fatality or inadvertent release of radioactively contaminated materials but shall not include non-radiological effluent releases to the environment.

c. Twenty-Four (24) Hour Notification Following Radiological Events

Notification to the NRC shall be made, within 24 hours of discovery of the event, of any event involving licensed material possessed by the licensee that may have caused or threatens to cause one or more of the following:

NOTE: The method of NRC notification shall be the same as that required for one (1) hour notification in § 5.9.2(a).

- (1)** Exposure of the whole body of any individual to 5 rems or more of radiation; exposure of the skin of the whole body of any individual to 30 rems or more of radiation; or exposure of the feet, ankles, hands or forearms to 75 rems or more of radiation.
- (2)** The release of radioactive material in concentrations which, if averaged over a period of 24 hours, would exceed 500 times the limits specified for such materials in Appendix B, Table II, of 10 CFR Part 20.
- (3)** A loss of one day or more of the operation of any facilities affected.
- (4)** Damage to property in excess of \$2,000.

d. Thirty (30) Day Written Reports (LER's)

A Licensee Event Report (LER) shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. with a copy to Region IV of the NRC, within 30 days after the discovery of the event, for any of the following:

- (1) Any Reportable Occurrence previously listed in these Technical Specifications requiring a 1, 4, or 24 hour NRC notification that is denoted by a **.

5.9.2 Continued

- (2) Any operation or condition prohibited by the Technical Specifications Safety Limits, Limiting Safety System Settings, or Limiting Conditions for Operation.
- (3) Any event where a single cause or condition caused at least one independent train or channel to become inoperable in multiple systems or two independent trains or channels to become inoperable in a single system designed to:
 - (i) Shutdown the reactor and maintain it in a safe shutdown condition;
 - (ii) Remove residual heat;
 - (iii) Control to release of radioactive material; or
 - (iv) Mitigate the consequences of an accident.
- (4) Each exposure of an individual to radiation in excess of the applicable limits in 10 CFR 20.101 or 10 CFR 20.104(a) or these Technical Specifications.
- (5) Each exposure of an individual to radioactive material in excess of the applicable limits in 10 CFR 20.103(a)(1), 10 CFR 20.103(a)(2), or 10 CFR 20.104(b), of these Technical Specifications.
- (6) Levels of radiation or concentrations of radioactive material in a restricted area in excess of any other applicable limit in these Technical Specifications.
- (7) Levels of radiation or concentrations of radioactive material (whether or not involving excessive exposure of any individual) in an unrestricted area in excess of ten times any applicable limit set forth in 10 CFR Part 20, or in these Technical Specifications.
- (8) Any level of radiation or release of radioactive material in excess of limits specified by 40 CFR Part 190, "Environmental Radiation Protection Standards for Nuclear Power Operations," or in excess of license conditions related to compliance with 40 CFR Part 190.

DISCUSSION, JUSTIFICATION, AND
SIGNIFICANT HAZARDS CONSIDERATIONS

The following changes are being proposed to the Fort Calhoun Station Technical Specifications in order to make those specifications conform with the new Significant Event and LER reporting requirements. Paragraphs 5.7.1(b) and (d) are being revised by deletion of the reporting requirements to the Commission. These reporting requirements have been superseded by reporting requirements set forth in the new rules on Significant Event and LER reporting. The requirement deleted from Section 5.7.1(b), which requires immediate reporting of Safety Limit violations, is covered under the proposed Technical Specification 5.9.2(4). The requirement for a 10-day written report to the Commission in the event of a Safety Limit violation has been superseded by the new 30-day LER reporting requirements in 10 CFR 50 and is covered in the Technical Specifications under Section 5.9.2(d)(2).

Significant hazards considerations are:

- (1) This proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The requirement for immediate notification of the Commission in the event of a Safety Limit violation has not been deleted. Notification of the Commission within one hour of the event is still required by a different section of the Technical Specifications. The deletion of the requirement to notify the Commission in writing within 10 days of the Safety Limit violation could not possibly involve an increase in the probability or consequences of a previously evaluated accident because it is "after the fact". This reporting requirement has been superseded by the new rule on LER reporting.
- (2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. These changes are purely administrative in nature and they do not reduce the District's reporting requirements for Safety Limit violations. The lengthening of the time requirement for submitting a written report from 10 days to 30 days could not possibly create an unevaluated accident as this only affects the District after the Safety Limit violation has occurred and has no direct safety impact on plant operation.
- (3) The proposed amendment does not involve a significant reduction in margin of safety. The proposed amendment is administrative in nature and "after the fact" (i.e., only affects the District in an administrative manner after the safety violation has occurred).

A change to Section 5.6.1 of the Fort Calhoun Station Technical Specifications is being proposed which will delete Section 5.6.1(a) requiring the Commission be notified and a report submitted pursuant to the requirements of Technical Specification 5.9.2. This change is being made because the requirement in Section 5.6.1(a) is redundant and, therefore, unnecessary. The reporting requirements to the Commission are clearly identified in Section 5.9.2 of the Technical Specifications. Section 5.6.1(b) of the Technical Specifications is being changed to include 1 and 4-hour reporting requirements to that specification.

Significant hazards considerations are:

- (1) This proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change is administrative in nature and in no reduces the reporting requirements from those set forth in the new Significant Event Reporting and LER rule.
- (2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. The change is administrative in nature and in no way alters the reporting requirements set forth in the new Significant Event Reporting and LER rule. The change is conservative in the fact that additional reporting requirements are included in the specification (i.e., 1 and 4-hour notification requirements).
- (3) The proposed amendment does not involve a significant reduction in a margin of safety. The change is administrative in nature and does not eliminate any reporting requirements.

Section 5.9.2(d)(2) of the proposed Technical Specifications for LER reporting is being amended to specify in more detail what operations or conditions prohibited by Technical Specifications are required to be reported. The District believes the intent of the LER rule provides for reporting of events or conditions that might lead to serious accidents or significant safety events. The NRC-developed criterion is based on potential consequences of the event as the measure of significance, not specifically the type of initiation events or causes of the event. Based on the NRC-developed criterion, the type of event must be fully analyzed before it could be determined if the event was reportable or not. Therefore, the District believes the LER requirements are intended to apply to equipment failures or major events that affect plant safety and not administrative or surveillance type problems, unless the consequences of those administrative events lead to a significant event from the standpoint of safety. The proposed wording of Section 5.9.2(d)(2) supports this reporting philosophy by more precisely defining what events are required to be reported.