

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

SAXTON NUCLEAR FACILITY

Operating License No. DPR-4
Docket No. 50-146
Technical Specification Change Request No. 56

STATE OF NEW JERSEY)
) SS:
COUNTY OF MORRIS)

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-4 for Saxton Nuclear Facility. As a part of this request, proposed replacement pages for Appendix A are also included.

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY: Robert L. Long
for President SNEC

Sworn and subscribed to before me
this 2 day of JUNE, 1995.

Julienne J. Schoffstall
Notary Public

JULIENNE J. SCHOFFSTALL
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires June 24, 1997

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
SAXTON NUCLEAR EXPERIMENTAL FACILITY

LICENSE NO. DPR-4
DOCKET NO. 50-146

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 56 to Appendix A of the Operating License for Saxton Nuclear Facility has, on the date given below, been filed with executives of Liberty Township, Bedford County, Pennsylvania; Bedford County, Pennsylvania; and the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection, by deposit in the United States mail, addressed as follows:

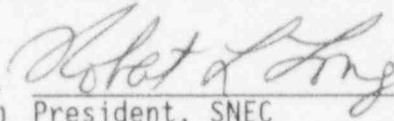
Mr. Donald Weaver, Chairman
Liberty Township Supervisors
R.D. #1
Saxton, PA 16678

Mr. Richard Rice, Chairman
Bedford County Commissioners
County Courthouse
203 South Juliana Street
Bedford, PA 15522

Mr. William Dornsife
Director, Bureau of Radiation Protection
PA Department of Environmental Resources
Fifth Floor, Fulton Building
Third and Locust Streets
P. O. Box 2063
Harrisburg, PA 17120

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY:


for President, SNEC

DATE: June 2, 1995

I. Technical Specification Change Request No. 56

The Saxton Nuclear Experimental Corporation (SNEC) requests that the following revision be made to the SNEC Technical Specifications (TS):

Replace pages 1, 2, 3, 7 and 8 with the included revised pages.

II. Reason for the Changes

- a. To permit direct access to the staging area around the Containment Vessel and the monorail at the access hatch, a gate was installed in the west span of the exclusion area fence surrounding the Containment Vessel. The gate is located at the concrete pad adjacent to the Containment Vessel hatch. As a result of installation of the additional gate, the wording of section A.2.b.1) on page 1 is proposed to be revised as follows:

"the gates to the Exclusion Area fence surrounding the Containment Vessel,"

The proposed change involves the pluralization of the word gate and revision to Figure 1, on page 7, showing the Saxton Nuclear Facility Layout. The proposed figure revision depicts the new gate in the location described. The change will have no impact on the physical barriers to intrusion since it will be maintained locked as are the other access points described in section A.2.b. except during periods of authorized entry.

- b. At the direction of the SNEC Board of Directors the organization performing the remainder of the characterization activities and future decommissioning activities at the Saxton site is proposed to be changed. It would be changed in such manner that although the President SNEC will remain as the individual responsible for the facility license, GPUNC would be delegated authority to control the activities. The change would allow GPUNC resources to be applied to SNEC activities within their normal organizational structure; eliminating the need to identify and compartmentalize a portion of the organization as specific to SNEC which was the approach in the past. To that end, the organization described by sections A.2.d, B.1.a and B.1.b, B.1.d, B.2.a and Figure 2 are proposed to be revised as follows:

A.2.d Employees of the Pennsylvania Electric Company's Line Department headquartered on the Penelec property shall report to the Program Director Saxton Nuclear Experimental Facility (SNEF) or the

designated representative any observed indication of change in the facility status as shown by smoke, fire, tornado, flood, or attempted break-in and take any immediate action authorized.

This change would rename the position being reported to from SNEC Vice President and General Manager to the Program Director SNEF. The change is administrative.

- B.1.a.2 President GPUNC provides full-time dedicated management for the purpose of conducting all nuclear activities safely and effectively. The Vice President Nuclear Services Division assures that all division and corporate activities are performed in accordance with corporate policies, applicable laws, regulations, licenses and technical specifications.

The change would provide statements not previously included which are now considered necessary to describe the reporting structure. The numbering of subsections following this inclusion would be renumbered to accomodate the addition.

- B.1.a.3 Program Director SNEF is responsible for administration of all SNEC functions, direction of all decontamination and characterization activities and for assuring that the requirements of License No. DPR-4 and these Technical Specifications are implemented.

The section was previously B.1.a.2. This change would rename the position of SNEC Vice President and General Manager to the Program Director SNEF and also adds the phrase "direction of all decontamination and decommissioning activities" to the responsibilities of the position. The renamed position reports to the GPUN Vice President Nuclear Services. The administrative change improves the description of the responsibilities of the position involved.

- B.1.a.6 The SNEF Site Supervisor reports to the Program Director SNEF. The Supervisor provides on-site management and continuing oversight of production activities.

The section was previously B.1.a.5. The change would revise both the name of the position from SNEC Technical Support Manager to SNEF Site Supervisor and the position to which it reports

from SNEC Vice President and General Manager to the Program Director SNEF. The change is administrative.

- B.1.b Other GPUN Division personnel provide SNEF management with technical support and project management capabilities.

The change to the wording of the text indicates that personnel from other GPUN divisions would be assigned and work together to provide technical support and project management capabilities to SNEF. At the same time, it would eliminate the connotation that an actual "team" has been formed for this purpose. The change is administrative.

- B.1.d.2 The words "and requirements of the Characterization Plan" would be deleted from the section since the need to brief personnel on the Characterization Plan is not required once characterization activities are complete. The revised wording still requires the briefing be made. This change is administrative.

- B.2.a.1 The Radiation Safety Committee shall report to the President GPUNC. The committee will consist of at least four members appointed by the President GPUNC. Three members shall constitute a quorum. It will be responsible to review all matters with radiological safety implications relative to activities at SNEC. Meetings shall be held at least annually to review and discuss the events of the preceding period.

The change in reporting is administrative and justified: the President GPUNC is the individual responsible for providing full-time dedicated management for the purpose of conducting all nuclear activities safely and effectively, the current plant condition (shutdown and defueled for more than two decades) and the activities to be performed are under the cognizance of the President GPUNC.

Figure 2 changes:

1. The President GPUNC reports directly to the SNEC President thereby modifying the indirect reporting relationship previously depicted.
2. The Vice President Nuclear Services is included in the organization chart since the Program Director SNEF reports directly to the position. Other

Nuclear Services Division departments which provide services in support of SNEF activities and are direct reports are indicated in a new box. Note that these other Nuclear Services Division departments (Environmental, Human Resources, Regulatory Affairs and Training) are not specifically identified. They are intentionally omitted to preclude the need for an additional TS changes based on a position name change or reporting change within the division.

3. The Radiation Safety Committee reports directly to the President GPUNC and maintains an indirect reporting relationship with both the Program Director SNEF and the Vice President Nuclear Services encouraging communication between the Radiation Safety Committee and site management in addition to the direct reporting relationships.
4. The Radiation Safety Officer reports directly to the Vice President Nuclear Services and is tied via an indirect reporting relationship to both the President GPUNC and the Program Director SNEF to encourage communication between the positions.

Deviation from ANSI/ANS-1.5.1,1990 guidance in this instance (the Radiation Safety Officer does not report directly to a Level I individual) is justified: the Vice President Nuclear Services is responsible to provide administrative and technical guidance applicable to radiation and respiratory protection, radioactive materials and radiological engineering for GPUNC, the current plant condition (shutdown and defueled for more than two decades) and the activities to be performed are under the cognizance of the Vice President Nuclear Services.

5. The box previously labeled Technical Support identified GPUN departments and depicted them as reporting directly to the President GPUN. They are departments of other GPUN divisions which report directly to the President GPUN which provide activities in support of SNEC. The box has been renamed Other GPUN Division Support to more correctly identify the relationship. The relationship between the the President GPUNC and the SNEC President is a direct reporting relationship as previously addressed.

These changes are administrative and allow resources supporting SNEC to work within the existing framework of the GPUNC organizational structure.

III. Safety Evaluation

Revision to the TS resulting from the installation of the additional gate and the changes in the organization and position titles for individuals performing and managing the activities at Saxton are administrative in nature. As such, these changes do not affect the health and safety of the public.

IV. No Significant Hazards Consideration

Accidents evaluated in the 1972 Safety Evaluation as applicable to the Saxton site are fire, flood and radiological hazard. The administrative organizational changes to the TS proposed by this TSCR will have no affect on the likelihood of those events.

Similarly, installation of the additional gate in the west span of the exclusion area fence surrounding the Containment Vessel is both a physical change to the fence and administrative change. Neither will have an affect on the likelihood of those events. Exclusion is the primary safeguard against radiological hazard. Access to areas within the Containment Vessel remain controlled by the locked and alarmed Containment Vessel personnel access hatch for those areas above the 812.0 foot elevation and the additional locked stairwell grating barrier barring access to areas below elevation 812.0.

SNEC has determined that this TSCR involves no significant hazards considerations as defined in 10 CFR 50.92. Allowing the administrative changes enhances the success of the remaining characterization and the decommissioning efforts by permitting effective utilization of the GPUNC organizational structure.

The administrative changes will not:

1. Result in a significant increase in the probability or consequences of an accident previously evaluated. The administrative changes will not impact the physical condition of the CV as it relates to the risk of fire, flood or radiological hazard.
2. Result in the creation of a new or different type of accident than that previously evaluated in the FSAR. In its present condition, the only accidents applicable to the site are those addressed above.

3. Result in a significant reduction in a margin of safety.
The proposed administrative changes would have no effect on any margins of safety for any evaluated accidents.

V. Implementation

It is requested that the amendment authorizing this TSCR be issued expeditiously and be effective upon issuance.

A. SITE

1. Location

The Saxton site is a 1.148 acre tract deeded from the Pennsylvania Electric Company to the Saxton Nuclear Experimental Corporation (SNEC). It is located within the property of the Pennsylvania Electric Company near the Borough of Saxton, Pennsylvania, in Liberty Township, Bedford County, Pennsylvania. The Pennsylvania Electric Company property consists of approximately 150 acres along the Raystown Branch of the Juniata River.

2. Exclusion Area Controls

- a. The exclusion area consists of that portion of the Saxton Nuclear Experimental Corporation property enclosed within the fence containing the Containment Vessel. See Figure 1.
- b. Except for authorized entry the following access points shall be maintained locked:
 - 1) the gates to the Exclusion Area fence surrounding the Containment Vessel,
 - 2) the Containment Vessel access door,
 - 3) the grating covering the Auxiliary Compartment stairwell in the Containment Vessel,
 - 4) and the Rod Room door.
- c. The Containment Vessel shall be equipped with an intrusion alarm to supplement the multiple physical barriers to intrusion.
- d. Employees of the Pennsylvania Electric Company's Line Department headquartered on the Penelec property shall report to the Program Director Saxton Nuclear Experimental Facility (SNEF) or the designated representative any observed indication of change in the facility status as shown by smoke, fire, tornado, flood, or attempted break-in and take any immediate action authorized.

3. Principal Activities

Pennsylvania Electric Company personnel associated with electric power transmission and maintaining electric power distribution equipment are headquartered on the Pennsylvania Electric Company property. Activities permitted within the Exclusion Area shall include routine and emergency inspections, maintenance associated with the possession of the Saxton Reactor Facility and characterization activities associated with the decommissioning of the facility.

B. ADMINISTRATIVE AND PROCEDURAL CONTROLS

Administrative controls relate to the organization, activities, procedures, record keeping, reporting and review and audit considered necessary to provide assurance and evidence that activities within the Exclusion Area are managed in a safe manner. Procedure controls are applicable to activities for which it is considered necessary to provide assurance that they are performed in a safe manner.

1. Organization

SNEC has the responsibility for safely maintaining the Containment Vessel and performing the characterization activities in support of its decommissioning. The organizational structure with reporting and communications lines is depicted in Figure 2.

- a. The responsibilities of management and supervisory level personnel are as follows:
 1. SNEC President provides management oversight for all Saxton activities and reports to the SNEC Board of Directors.
 2. President GPUNC provides full-time dedicated management for the purpose of conducting all nuclear activities safely and effectively. The Vice President Nuclear Services Division assures that all division and corporate activities are performed in accordance with corporate policies, applicable laws, regulations, licenses and technical specifications.
 3. Program Director SNEF is responsible for administration of all SNEC functions, direction of all decontamination and characterization activities and for assuring that the requirements of License No. DPR-4 and these Technical Specifications are implemented.
 4. SNEC Radiation Safety Officer (RSO) is responsible for the conduct and oversight of all Saxton Radiation Safety Activities through implementation of the SNEC Radiation Protection Plan. All radiological controls personnel shall have stop work authority in matters relating to or impacting radiation safety.
 5. Group Radiological Controls Supervisor (GRCS) directly supervises radiation safety activities. The position reports to the RSO.
 6. The SNEF Site Supervisor reports to the Program Director SNEF. The supervisor provides on-site management and continuing oversight of production activities.
- b. Other GPUN Division personnel provide SNEF management with technical support and project management capabilities.
- c. Staffing requirements are as follows:
 1. At least two individuals, one of which must be knowledgeable in radiation monitoring and the radiological

hazards associated with the facility, shall perform radiological surveys necessary to support planned activities within the Containment Vessel if the Containment has been secured (Containment Vessel is sealed except for the breather opening) for a period greater than 24 hours.

2. The RSO or a qualified designee shall be present on site whenever entry and/or maintenance or characterization activities within Containment are in progress.

d. Personnel selection and training requirements are as follows:

1. Each Radiological Controls Technician/GRCS shall meet or exceed the qualifications of ANSI-N 18.1-1971, paragraph 4.5.2 and 4.3.2 respectively or shall be formally qualified through an NRC approved Radiological Controls training program.
2. All personnel conducting maintenance or characterization activities shall be briefed on the SNEC site specific conditions.

2. Review and Audit

a. Radiation Safety Committee

1. The Radiation Safety Committee shall report to the President GPUNC. The Committee will consist of at least four members appointed by the President GPUNC. Three members shall constitute a quorum. It will be responsible to review all matters with radiological safety implications relative to activities at SNEC. Meetings shall be held at least annually to review and discuss the events of the preceding period.
2. The Committee will review License and Technical Specification changes, characterization and maintenance actions, special nuclear and radioactive material activities, facility changes, quarterly inspection results, audit and NRC Inspection reports and corrective actions for deficiencies identified.
3. Written minutes of all meetings shall be prepared and distributed to the SNEC President within 30 days of the meeting date.

b. The audit function is provided by GPUNC and is independent of SNEC management. Audits shall be performed by qualified individuals, as a minimum, for those activities designated within the scope of the SNEC QA Program. Audits are generally conducted biennially, however, frequency is based on the level