

Attachment 1

Proposed Changes to  
Technical Specification Pages

Unit 1

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Unit 2

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## ADMINISTRATIVE CONTROLS

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### 6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor or during his absence from the Control Room a designated individual shall be responsible for the Control Room Command function. A management directive to this effect, signed by the Senior Vice President responsible for Nuclear Generation, hereafter referred to as Senior Vice President, shall be reissued on an annual basis.

### 6.2 ORGANIZATION

#### OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

#### FACILITY STAFF

6.2.2 The facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room while the unit is in MODE 1, 2, 3 or 4.
- c. A health physics technician # shall be on site when fuel is in the reactor.
- d. ALL CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times.# The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

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#The health physics technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of the health physics technician and/or Fire Brigade members provided immediate action is taken to restore the health physics technician and/or Fire Brigade to within the minimum requirements.

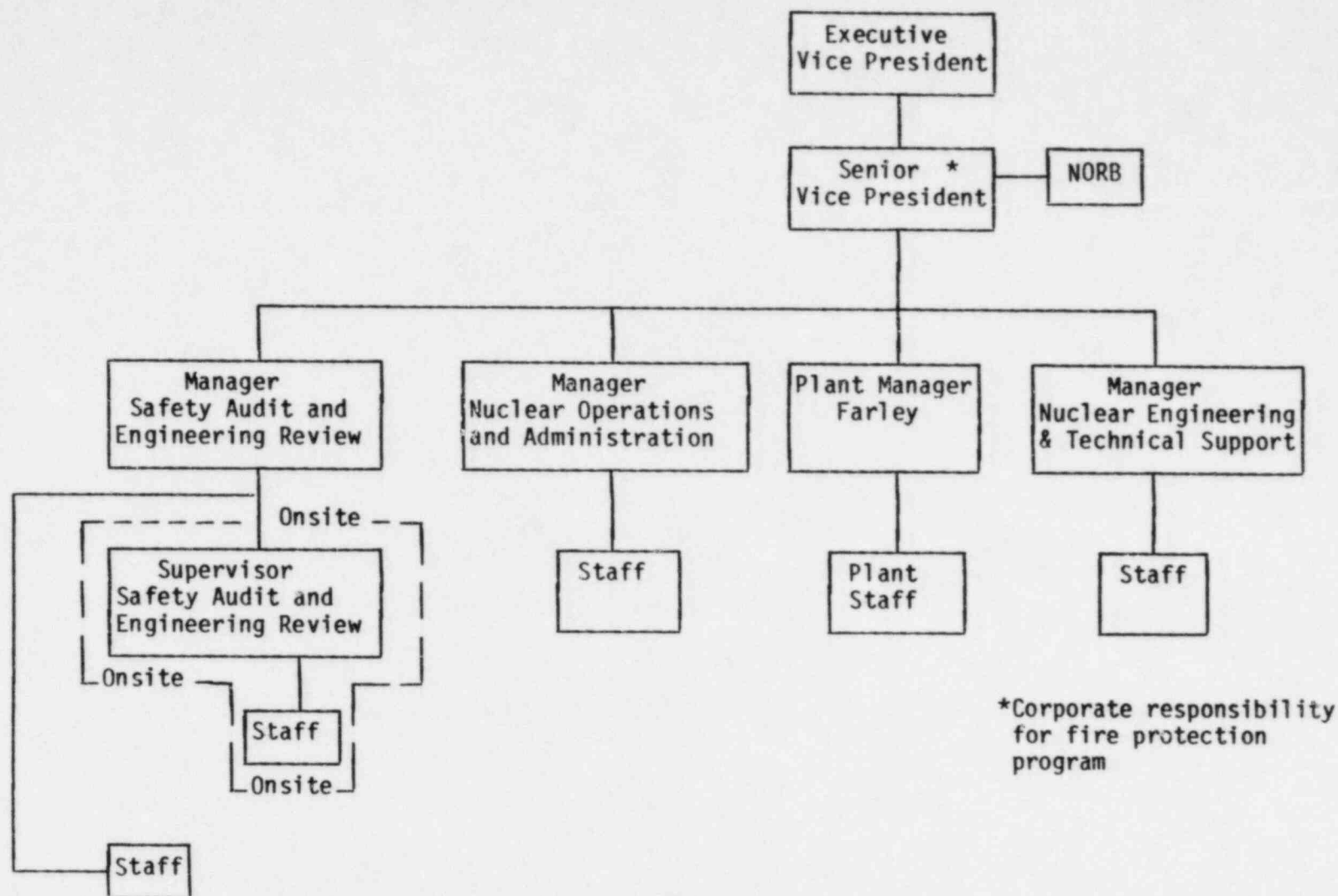


Figure 6.2-1 Offsite Organization for Facility Management and Technical Support

## ADMINISTRATIVE CONTROLS

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### 6.2.3 SAFETY AUDIT AND ENGINEERING REVIEW GROUP (SAERG)

#### FUNCTION

6.2.3.1 The SAERG shall function to conduct operational evaluations, engineering reviews, and audits for the purpose of improving safety.

#### COMPOSITION

6.2.3.2 The SAERG shall be composed of multi-disciplined dedicated onsite group with a minimum assigned complement of five engineers or appropriate specialists.

#### RESPONSIBILITIES

6.2.3.3 The SAERG shall be responsible for the following:

- a. Participating in operational evaluations for improvement of safety wherein such evaluations and recommendations therefrom are not limited to the fulfillment of existing programs, policies, procedures, or capabilities of existing equipment and installations.
- b. Systematic engineering reviews of plant performance and activities with results reported independently of onsite operational management to offsite upper management.
- c. Comprehensive plant audits in accordance with audit requirements set forth in quality assurance programs, licensing documents, and other policies and procedures.

#### AUTHORITY

6.2.3.4 The onsite SAERG shall carry out its function reporting offsite directly to the Manager-Safety Audit and Engineering Review who in turn reports directly to the Senior Vice President.

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor primarily in the assessment of accident and transient occurrences.

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, except for (1) the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

## ADMINISTRATIVE CONTROLS

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### AUTHORITY

6.5.1.7 The PORC shall:

- a. Recommend to the Plant Manager in writing, approval or disapproval of items considered under 6.5.1.6(a) through (e) and (j) and (k) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a), (c) and (d) above constitutes an unreviewed safety question.
- c. Make recommendations to the Plant Manager in writing that actions reviewed under 6.5.1.6(b) above did not constitute an unreviewed safety question.

### RECORDS

6.5.1.8 The PORC shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President and Chairman of the Nuclear Operations Review Board.

## 6.5.2 NUCLEAR OPERATIONS REVIEW BOARD (NORB)

### FUNCTION

6.5.2.1 The NORB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Quality assurance practices

### COMPOSITION

6.5.2.2 The NORB shall be composed of at least four persons including:

Chairman:	Senior Vice President
Vice Chairman:	Manager-Nuclear Operations and Administration
Secretary:	Manager-Safety Audit and Engineering Review
Member:	Manager-Nuclear Engineering and Technical Support

and other appointed personnel having an academic degree in an engineering or physical science field and a minimum of five years technical experience, of which a minimum of three years shall be in one or more of the areas given in 6.5.2.1.

## ADMINISTRATIVE CONTROLS

Senior Reactor Operator's License. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Plant Manager. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Plant Manager.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment. Proposed test and experiments shall be approved before implementation by the Plant Manager.
- d. Occurrences reportable pursuant to the Technical Specification 6.0 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the Plant Manager and forwarded to the Senior Vice President and to the Chairman of the Nuclear Operations Review Board.
- e. Individuals responsible for reviews performed in accordance with 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, and 6.5.3.1.d shall be members of the plant supervisory staff previously designated by the Plant Manager. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.
- f. Each review will include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10CFR50.59 NRC approval of items involving unreviewed safety question will be obtained prior to Plant Manager approval for implementation.

## RECORDS

6.5.3.2 Records of the above activities shall be provided to the Plant Manager, PORC and/or NORB as necessary for required reviews.



## ADMINISTRATIVE CONTROLS

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### 6.6 REPORTABLE EVENT ACTION

#### 6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NORB and the Senior Vice President.

### 6.7 SAFETY LIMIT VIOLATION

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

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and all cases within one hour. The Senior Vice President shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. 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 Commission, and the Senior Vice President for NORB review within 14 days of the violation.

### 6.8 PROCEDURES AND PROGRAMS

#### 6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.

## ADMINISTRATIVE CONTROLS

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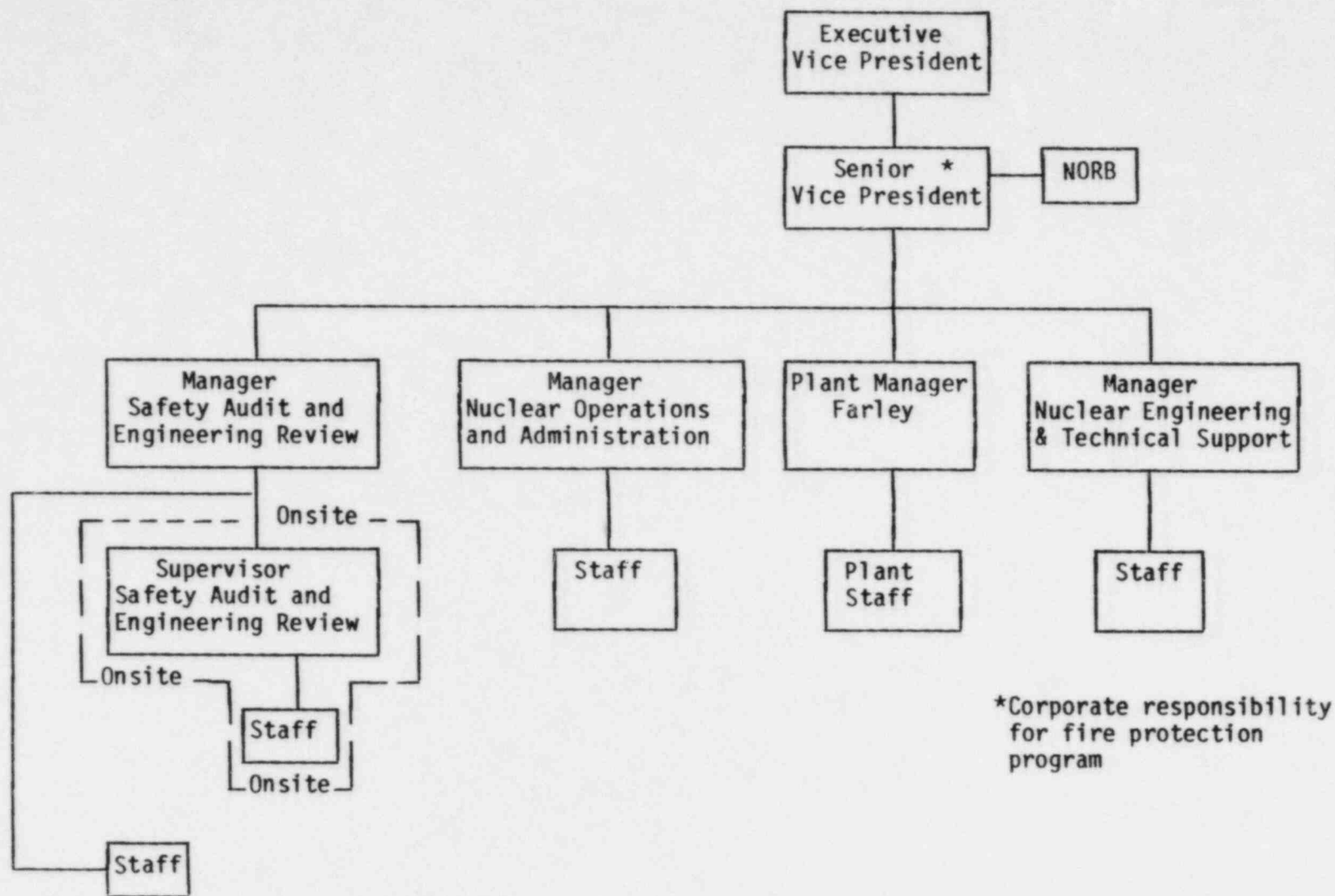


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