



3.7.B & 3.7.C BASES (cont'd)

High efficiency particulate absolute (HEPA) filters are installed before and after the charcoal adsorbers to minimize potential release of particulates to the environment and to prevent clogging of the iodine adsorbers. The charcoal adsorbers are installed to reduce the potential release of radioiodine to the environment. The in-place test results should indicate a system leak tightness of less than 1 percent bypass leakage for the charcoal adsorbers and HEPA filters. The laboratory carbon sample test results should indicate a radioactive methyl iodide removal efficiency of at least 99 percent for expected accident conditions. If the performance of the HEPA filters and charcoal adsorbers are as specified, the resulting doses will be less than the 10 CFR 100 guidelines for the accidents analyzed.

Only one of the two standby gas treatment systems is needed to cleanup the reactor building atmosphere upon containment isolation. If one system is found to be inoperable, there is no immediate threat to the containment system performance and reactor operation or refueling operation may continue while repairs are being made. If neither system is operable, the plant is brought to a condition where the standby gas treatment system is not required.

4.7.B & 4.7.C BASES

Standby Gas Treatment System and Secondary Containment

Initiating reactor building isolation and operation of the standby gas treatment system to maintain at least a 1/4 inch of water vacuum within the secondary containment provides an adequate test of the operation of the reactor building isolation valves, leak tightness of the reactor building and performance of the standby gas treatment system. Functionally testing the initiating sensors and associated trip channels demonstrates the capability for automatic actuation. Periodic testing gives sufficient confidence of reactor building integrity and standby gas treatment system performance capability.

Pressure drop across the combined HEPA filters and charcoal adsorbers of less than 6 inches of water at the system design flow rate will indicate that the filters and adsorbers are not clogged by excessive amounts of foreign matter. A 7.8 kw heater is capable of maintaining relative humidity below 70%. Heater capacity and pressure drop should be determined at least once per operating cycle to show system performance capability.

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. Tests of the charcoal adsorbers with halogenated hydrocarbon refrigerant shall be performed in accordance with ANSI N510-1980. The test canisters that are installed with the adsorber trays should be used for the charcoal adsorber efficiency test. Each sample should be at least two inches in diameter and a length equal to the thickness of the bed. If test results are unacceptable, all adsorbent in the system shall be replaced.

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION

6.1.1 Responsibility

The Division Manager of Nuclear Operations shall have the over-all fulltime onsite responsibility for the safe operation of the Cooper Nuclear Station. During periods when the Division Manager of Nuclear Operations is unavailable, this responsibility automatically shifts to either the Senior Manager of Operations, the Senior Manager of Technical Support Services, or the Senior Manager of Staff Support (in that order). During periods when none of these individuals are available, the responsibility may be delegated in writing to one of the managers in the Nuclear Operations Division.

6.1.2 Offsite and Onsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- A. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR.
- B. The Division Manager of Nuclear Operations 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.
- C. The Nuclear Power Group Manager shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- D. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.1.3 Plant Staff - Shift Complement

The shift complement at the station shall at all times meet the following requirements. Note: Higher grade licensed operators may take the place of lower grade licensed or unlicensed operators.

- A. A licensed senior reactor operator (SRO) shall be present at the station at all times when there is any fuel in the reactor.
- B. A licensed reactor operator shall be in the control room at all times when there is any fuel in the reactor.
- C. Two licensed reactor operators shall be in the control room during all startup, shutdown and other periods involving significant planned control rod manipulations. A licensed SRO shall either be in the Control Room or immediately available to the Control Room during such periods.