

- a. Review of all procedures required by Technical Specification 7.4(a), (b), and (c) and changes thereto, and any other proposed procedure or changes to approved procedures as determined by the Station Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering the evaluation and recommendations to prevent recurrence to the Manager, Nuclear Production and to the Chairman of the Nuclear Facility Safety Committee.
- f. Review of all Reportable Events.
- g. Review of facility operations to detect potential nuclear safety hazards.

1 (7) All Reportable Events.

(8) Any indication that there may be a deficiency in some aspect of design or operation of structures, systems, or components, that affect nuclear safety.

(9) Reports and meeting minutes of the PORC.

b. Audits of facility activities shall be performed under the cognizance of the Nuclear Facility Safety Committee. These audits shall encompass:

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

(2) The performance, training, and qualifications, of the facility staff at least once per year.

(3) The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per six months.

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- 3) Licensee Event Reports (LER).
- 4) Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- 5) Records of reactor tests and experiments.
- 6) Records of changes made to Operating Procedures.
- 7) Records of radioactive shipments.
- 8) Records of sealed source leak tests and results.
- 9) Records of annual physical inventory of all source material of record.

b) The following records shall be retained for the duration of the Facility Operating License:

- 1) Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- 2) Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- 3) Records of facility radiation and contamination surveys.

the license application and amendments thereto;

5. An evaluation of the change, which shows the expected maximum exposures to individuals in the unrestricted area and to the general population that differ from those previously estimated in the license application and amendments thereto;
6. 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 prior to when the changes are to be made;
7. An estimate of the exposure to plant operating personnel as a result of the change; and
8. Documentation of the fact that the change was reviewed and found acceptable by the Plant Operations Review Committee.

| 7.5.2 Reportable Events

| a) Notification Requirements

| The NRC shall be notified pursuant to the  
| conditions and requirements of 10 CFR 50.72.

b) Licensee Event Reports (LER)

Licensee Event Reports will be submitted to the NRC pursuant to the conditions and requirements of 10 CFR 50.73.

7.5.3 Non-Routine Radiological Reports

a. Radioactive Gaseous Effluent

1. If the calculated dose from the release of gaseous effluents pursuant to ESR 8.1.1.i) exceeds any of the limits in ELCO 8.1.1.h), in lieu of a Licensee Event Report, a special report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits will be prepared and submitted to the NRC within 30 days.



2. If gaseous waste is discharged without treatment and in excess of the limits, in lieu of a Licensee Event Report, a special report that includes the following information shall be prepared and submitted to the NRC within 30 days:

(a) Explanation of why gaseous radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,

(b) Action(s) taken to restore the inoperable equipment to operable status, and

(c) Summary description of action(s) taken to prevent a recurrence.

b. Radioactive Liquid Effluent

1. If the calculated dose from the release of radioactive materials in liquid effluents pursuant to ESR 8.1.2.e) exceeds any of the limits specified in ELCO 8.1.2.g), in lieu of a Licensee Event Report, a special report that identifies the cause(s) for exceeding the

limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits will be prepared and submitted to the NRC within 30 days.

2. If radioactive liquid waste is discharged without treatment pursuant to ELCO 8.1.2.h), and in excess of the limits, in lieu of a Licensee Event Report, a special report that includes the following information shall be prepared and submitted to the NRC within 30 days:

- (a) Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,

- (b) Action(s) taken to restore the inoperable equipment to operable status, and

(c) Summary description of action(s)  
taken to prevent a recurrence.

c. Radioactive Effluents - Total Dose

1. If the limits of ELCO 8.1.5.a) have been exceeded, in lieu of a Licensee Event Report, a special report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits shall be prepared and submitted to the NRC within 30 days. This special report, as defined in 10CFR Part 20.405c, shall include an analysis that estimates the radiation exposure (dose) to a member of the public from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the



release condition resulting in violation of 40CFR Part 190 has not already been corrected, the special report shall include a request for a variance in accordance with the provisions of 40CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

d. Radiological Environmental Monitoring

1. If the level of radioactivity as a result of plant effluents in an environmental sample medium at a specified location exceeds the reporting levels of Table 8.2-3 of ELCO 8.2.1, when averaged over any calendar quarter, in lieu of a Licensee Event Report, pursuant to Specification ELCO 8.2.1.c), a special report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents such that the potential annual dose to a member of the public is less than the calendar year limits of Specifications ELCO 8.1.1.h) and ELCO 8.1.2.g) will be prepared and

submitted to the NRC within 30 days. When more than one of the radionuclides in Table 8.2-3 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{Concentration (1)}}{\text{Reporting Level (1)}} + \frac{\text{Concentration (2)}}{\text{Reporting Level (2)}} + \dots \geq 1.0$$

When radionuclides other than those in Table 8.2-3 are detected and are the result of plant effluents, a report shall be submitted if the potential annual dose to a member of the public is equal to or greater than the calendar year limits of Specifications ELCO 8.1.1.i) and ELCO 8.1.2.g). This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Monitoring Report.