

OYSTER CREEK NUCLEAR GENERATING STATION
PROVISIONAL OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 120

Applicant hereby request the Commission to change Appendix A to the above captioned license as follows:

1. Sections to be changed:

Figure 6.2.2 and Sections 6.3.1, 6.8.1, and 6.9.3.

2. Extent of changes:

See Attachment 1

3. Changes requested:

See Attachment 1

4. Discussion:

The primary reason for this change request is to submit a Plant Engineering organization which is more responsive to the continuing operations and maintenance needs of the Oyster Creek Facility and to enhance the administrative capabilities of the organization.

The reorganization will achieve this by:

- a. Reducing the number of direct interfaces to both the Plant Engineering Director and the Manager - Plant Engineering.
- b. Provide a three Manager structure with specific responsibilities in the areas of Operations, Maintenance, and Support.
- c. Provide direct interfaces with Plant Engineering for the related organizations of the Oyster Creek division and GPUN.
- d. Assigning specific responsibility to a dedicated group for discharging the administrative functions of Plant Engineering.

Another change that is being made within the organization at Oyster Creek is that the position of Manager, Radiological Controls has been upgraded to the Director level. The Technical Specification requirements for this position remain the same.

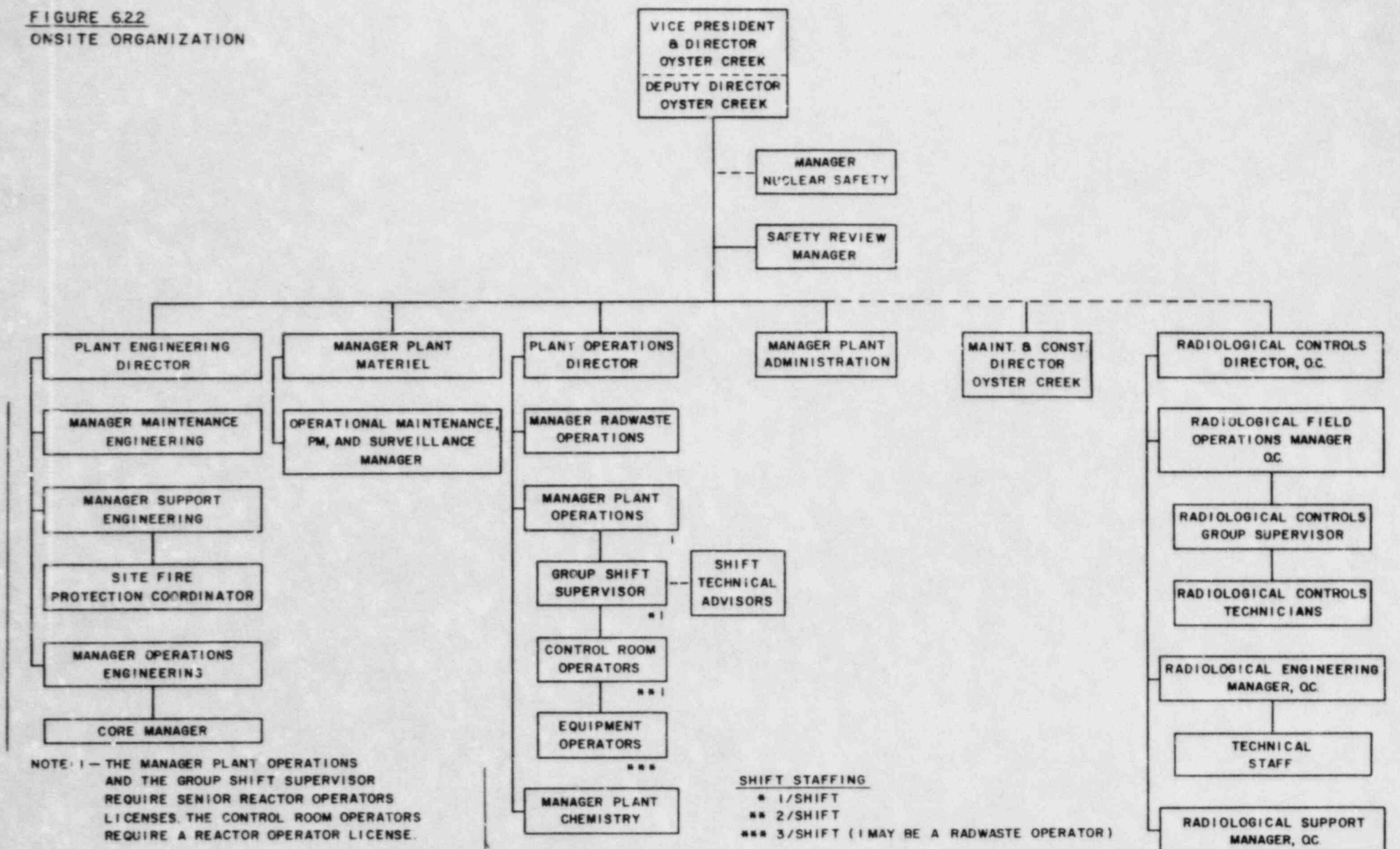
The third reason for this change request is to submit two (2) other changes to the administrative section of the Technical Specifications. These changes are an updating of the requirements for written procedures in effect for Oyster Creek and the addition of the NUREG-0737 requirement for a special report that is to be submitted after the failure of, or challenge to, Relief and Safety valves.

ATTACHMENT 1

Summary of Tech. Spec. Change Request No. 120

<u>No.</u>	<u>Current Tech. Spec.</u>	<u>Proposed Tech Spec.</u>	<u>Extent of Change</u>	<u>Justification</u>
1.	Figure 6.2.2 Page 6-4	Figure 6.2.2 Page 6-4	Figure redrawn to reflect reorganization of Oyster Creek Onsite Organization within Plant Engineering, Plant Operations, and Radiological Controls	GPUN approved administrative change
2.	Specification 6.3.1 Paragraph 6 Page 6-6	Specification 6.3.1 Paragraph 7 Page 6-5	Title Change; presently Chemistry Manager, to be changed to Manager-Plant Chemistry	GPUN approved administrative change
3.	Specification 6.3.1 Paragraph 4 Page 6-6	Specification 6.3.1 Paragraph 4 Page 6-6	Title Change; presently Manager Plant Engineering, to be changed to Managers-Plant Engineering	GPUN approved administrative change
4.	Specification 6.3.1 Paragraph 1 Page 6-6	Specification 6.3.1 Paragraph 5 Page 6-6	Title Change; presently Manager Core, to be changed to Core Manager	GPUN approved administrative change
5.	Specification 6.3.1 Paragraph 5 Page 6-6	Specification 6.3.1 Paragraph 6 Page 6-6	Title Change; presently Manager/Deputy Radiological Controls, to be changed to Radiological Controls Director	GPUN approved administrative change
6.	Specification 6.8.1 Page 6-15	Specification 6.8.1 Page 6-15	Change of requirements for written procedures in effect	GPUN approved administrative change
7.	Specification 6.9 Page 6-16	Specification 6.9 Page 6-16	Correction of spelling of Enforcement	Correct an existing typographical error
8.		Specification 6.9.3.F Page 6-22	Addition of the requirement for a special report that is to be submitted after the failure of, or challenge to, Relief and Safety Valves that might not constitute an LER.	NUREG-0737 requirement

FIGURE 6.22
ONSITE ORGANIZATION



6.3 FACILITY STAFF QUALIFICATIONS

6.3.1

The members of the facility staff shall meet or exceed the following qualifications:

Vice President & Director/Deputy Director

Requirements: Ten years total power plant experience of which three years must be nuclear power plant experience. A maximum of four years of academic training may fulfill four of the remaining seven years of required experience. Both must be capable of obtaining or possess a Senior Reactor Operator's License.

Plant Operations Director

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two years of the remaining five years of required experience. The Plant Operations Director must be capable of obtaining or possess a Senior Reactor Operator's License.

Plant Engineering Director

Requirements: Eight years of responsible positions related to power generation, of which three years shall be nuclear power plant experience. A maximum of four of the remaining five years of experience may be fulfilled by satisfactory completion of academic or related technical training.

Manager-Plant Administration

Requirements: Eight years total power plant experience of which four years must have been in nuclear power plant experience. The Manager should possess a four year college degree or equivalent in Business Administration or an Engineering discipline.

Manager-Plant Operations

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two of the remaining five years of required experience. The Manager Plant Operations must possess a Senior Reactor Operator's License.

Manager-Plant Chemistry

Requirements: Five years experience in chemistry of which a minimum of one year shall be in radiochemistry at an operating nuclear power plant. A maximum of four years of this five year experience may be fulfilled by related technical or academic training.

Safety Review Manager

Requirements: Eight years total power plant experience of which three years must be nuclear power plant experience. A maximum of two years of academic or related technical training may fulfill two of the remaining five years of required experience.

Manager-Plant Materiel

Requirements: Seven years of total power plant experience of which one year must be nuclear power plant experience. Two years of academic or related technical training may fulfill two of the remaining six years of required experience.

Area Supervisor-Instrument and Computer Maintenance

Requirements: Five years of experience in instrumentation and control, of which a minimum of one year shall be in nuclear instrumentation and control at an operating nuclear power plant. A maximum of four years of this five year experience may be fulfilled by related technical or academic training.

Managers-Plant Engineering

The engineers in charge of technical support shall have a Bachelor's Degree in Engineering or the Physical Sciences and have three years of professional level experience in nuclear services, nuclear plant operation, or nuclear engineering, and the necessary overall nuclear background to determine when to call consultants and contractors for dealing with complex problems beyond the scope of owner-organization expertise.

Core Manager

At the time of initial core loading or appointment to the position, whichever is later, the responsible person shall have a Bachelor's Degree in Engineering or the Physical Sciences and four years experience or a graduate degree and three years experience. Two of these years shall be nuclear power plant experience. The experience shall be in such areas as reactor physics, core measurements, core heat transfer, and core physics testing programs. Successful completion of a reactor engineering training program (such as the 12 week concentrated programs offered by NSS Vendors) may be equivalent to one year's nuclear power plant experience.

Radiological Controls Director (Reports Offsite)

Requirements: Bachelor's degree or the equivalent in a science or engineering subject, including some formal training in radiation protection. Five years of professional experience in applied radiation protection. (Master's degree equivalent to one year experience and Doctor's degree equivalent to two years experience where coursework related to radiation protection is involved.) Three years of this

professional experience should be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations.

M&C Director, O.C.

Requirements: Seven years of total power plant experience of which one year must be nuclear power plant experience. Two years of academic or related technical training may fulfill two of the remaining six years of required experience.

Shift Technical Advisor

Requirements: Bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.3.2

Each member of the radiation protection organization for which there is a comparable position described in ANSI N18.1-1971 shall meet or exceed the minimum qualifications specified therein, or in the case of radiation protection technicians, they shall have at least one year's continuous experience in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations, and shall have been certified by the Mgr/Deputy Radiological Controls, as qualified to perform assigned functions. This certification must be based on an NRC approved, documented program consisting of classroom training with appropriate examinations and documented positive findings by responsible supervision that the individual has demonstrated his ability to perform each specified procedure and assigned function with an understanding of its basis and purpose.

6.4 TRAINING

6.4.1

A retraining program for operators shall be maintained under the direction of the Manager Plant Training Oyster Creek and shall meet the requirements and recommendation of Appendix A of 10CFR Part 55. Replacement training programs, the content of which shall meet the requirements of 10CFR Part 55, shall be conducted under the direction of the Manager Plant Training Oyster creek for licensed operators and Senior Reactor Operators.

6.4.2

A training program for the Fire Brigade shall be maintained under the direction of the Manager Plant Training Oyster Creek.

6.7 SAFETY LIMIT VIOLATION

6.7.1

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

- a. If any Safety Limit is exceeded, the reactor shall be shut down immediately until the Commission authorizes the resumption of operation.
- b. The Safety Limit violation shall be reported to the Commission and the Vice President and Director Oyster Creek.
- c. A Safety Limit Violation Report shall be prepared. The report shall be submitted to the Vice President and Director Oyster Creek. 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 within 10 days of the violation.

6.8 PROCEDURES

6.8.1

Written procedures shall be established, implemented, and maintained that meet or exceed the requirements of the Nuclear Regulatory Guide 1.33 (the applicable revision is identified in the GPU Nuclear Operational Quality Assurance Plan) and as provided in 6.8.2 and 6.8.3 below.

6.8.2

Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed as described in 6.5.1.1 and approved as described in 6.5.1 prior to implementation and periodically as specified in the Administrative Procedures.

6.8.3

Temporary changes to procedures 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of GPUNC Management Staff authorized under Section 6.5.1.12 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of facility systems or equipment, at least one of these individuals shall be a member of facility management or supervision holding a Senior Reactor Operator's License on the facility.
- c. The change is documented, subsequently reviewed and approved as described in 6.8.2 within 14 days of implementation.

6.9 REPORTING REQUIREMENTS

In addition to the applicable reporting requirements of 10 CFR, the following identified reports shall be submitted to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

6.9.1 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 FSAR 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 specified 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 Exposure Data Report. Routine exposure data reports covering the operation of the facility during the previous calendar year shall be submitted prior to March 1 of each year. Reports shall contain a tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/year and their associated man rem exposure according to work and job functions (This tabulation supplements the requirements of 10 CFR 20.407), e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly

20 estimates of the likely resultant exposure to individuals and to population groups, and assumptions upon which estimates are based shall be provided.

(c). If statistically significant variations of offsite environmental concentrations with time are observed, correlation of these results with effluent release shall be provided.

(d). Results of required leak tests performed on sealed sources if the tests reveal the presence of 0.005 microcuries or more of removable contamination.

d. Inoperable Fire Protection Equipment (3.12)

e. Core Spray Sparger Inservice Inspection (Table 4.3.1-9)

Prior to startup of each cycle, a special report presenting the results of the inservice inspection of the Core Spray Spargers during each refueling outage shall be submitted to the Commission for review.

f. Failures and challenges to Relief and Safety Valves

Failures and challenges to Relief and Safety Valves which do not constitute an LER will be the subject of a special report submitted to the Commission within 60 days of the occurrence. A challenge is defined as any automatic actuation (other than during surveillance or testing) of Safety or Relief Valves.

6.10 RECORD RETENTION

6.10.1

The following records shall be retained for at least five years:

a. Records and logs of facility operation covering time interval at each power level.

b. Records and logs of principle maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

c. Reportable occurrence reports.

d. Records of surveillance activities, inspections and calibrations required by these technical specifications.

e. Records of reactor tests and experiments.

f. Records of changes made to operating procedures.

g. Records of radioactive shipments

h. Records of sealed source leak tests and results.

i. Records of annual physical inventory of all source material of record.

6.10.2

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

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to these technical specifications.
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- j. Records of reviews by the Independent Onsite Safety Review Group.
- k. Records for Environmental Qualification which are covered under the provisions for paragraph 6.14.

6.10.3

Quality Assurance Records shall be retained as specified by the Quality Assurance Plan.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 (Deleted)

May 14, 1984
Reply to Notice of Violation
Inspection 84-06
Letter dated April 12, 1984
Page 3 of 5

Action Taken to Prevent Recurrence

- A Nuclear Group Directive (NGD) will be written to encompass all aspects of the ISI Program at Beaver Valley Power Station.
- Site Administrative Procedures (SAPs) will be developed to delineate responsibilities to the various station groups involved with the IST Program. The SAPs will also identify the approval process for the program.
- An IST Manual will also be developed which will contain specific Code requirements and the method by which the Station will accomplish these commitments.

Date Upon Which Full Compliance Will Be Achieved

Full compliance will be achieved with the completion of the administrative procedures and the IST Manual. These actions are expected to be complete by October 1, 1984.

Specific Actions Taken

In response to the specific items listed in the Notice of Violation as examples of the lack of management controls for the IST Program, the following actions have been or will be taken:

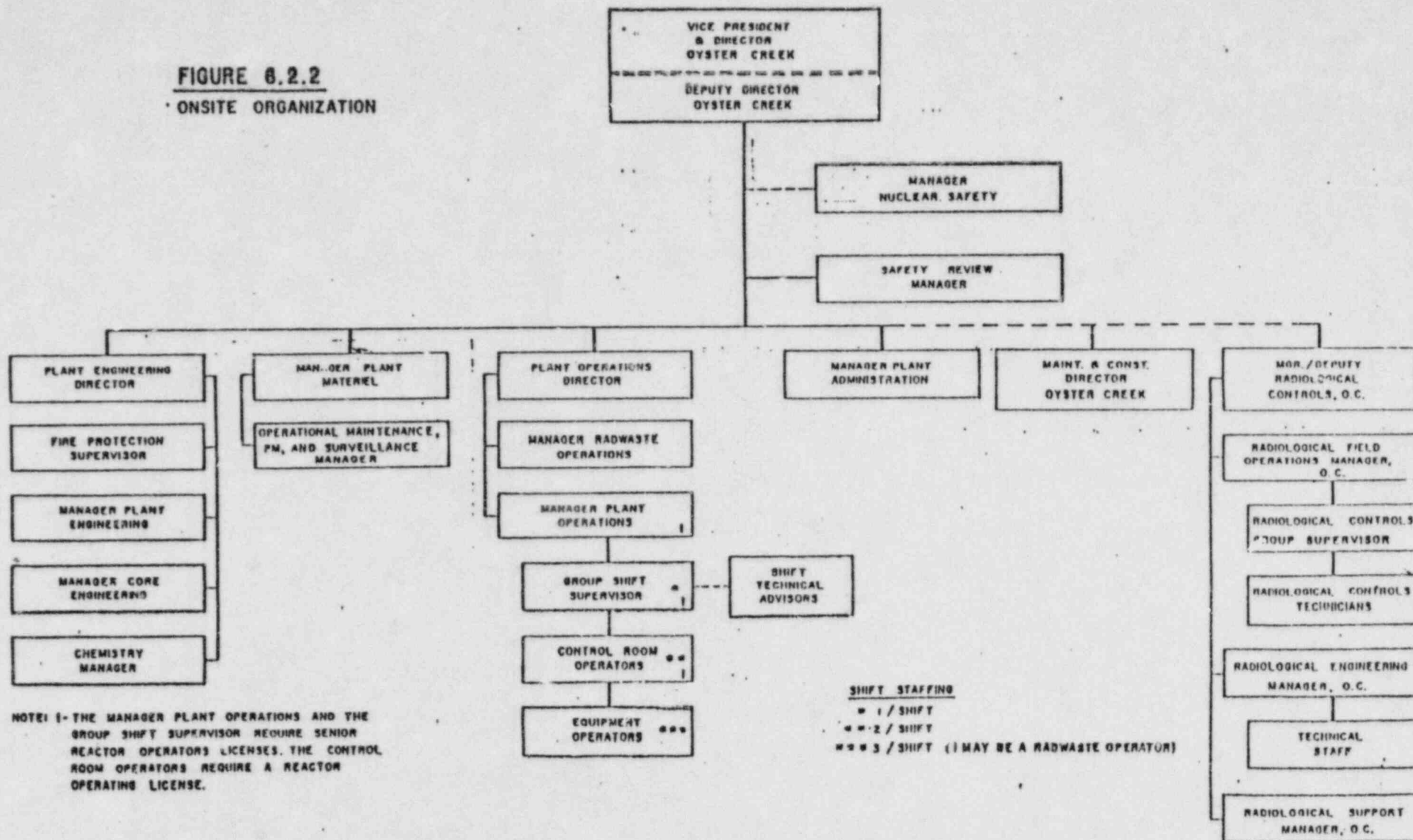
1. Hydrogen recombiners valves MOV-1HY-201A and MOV-1HY-201B are required to be tested quarterly in accordance with ASME Section XI 1WV-3410, and the valves were not being tested quarterly. These valves had specifically been denied relief from quarterly testing in a letter dated June 29, 1982 from NRC to Beaver Valley.

Actions Taken:

OSTs 1.46.6 and 1.46.7 have been written to ensure that valves MOV-1HY-201A and MOV-1HY-201B are tested quarterly as required by the Code. In addition, a review was performed by the Duquesne Light Company Quality Assurance Unit to identify any other discrepancies with the June 29, 1982 NRC letter. The administrative procedures being developed will specify that all testing will be performed in accordance with the Code unless specific relief has been granted.

FIGURE 6.2.2

ONSITE ORGANIZATION



Current Tech. Spec. Page

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1

The members of the facility staff shall meet or exceed the following qualifications:

Vice President & Director/Deputy Director

Requirements: Ten years total power plant experience of which three years must be nuclear power plant experience. A maximum of four years of academic training may fulfill four of the remaining seven years of required experience. Both must be capable of obtaining or possess a Senior Reactor Operator's License.

Plant Operations Director

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Plant Engineering Director

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Manager Plant Administration

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Safety Review Manager

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Manager Core Engineering

At the time of initial core loading or appointment to the position, whichever is later, the responsible person shall have a Bachelor's Degree in Engineering or the Physical Sciences and four years experience or a graduate degree and three years experience. Two of these years shall be nuclear power plant experience. The experience shall be in such areas as reactor physics, core measurements, core heat transfer, and core physics testing programs. Successful completion of a reactor engineering training program (such as the 12 week concentrated programs offered by NSS Vendors) may be equivalent to one year's nuclear power plant experience.

Manager Plant Materiel

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Area Supervisor Instrument & Computer Maintenance

Requirements: Five years of experience in instrumentation and control, of which a minimum of one year shall be in nuclear instrumentation and control at an operating nuclear power plant. A maximum of four years of this five year experience may be fulfilled by related technical or academic training.

Manager Plant Engineering

The engineer in charge of technical support shall have a Bachelor's Degree in Engineering or the Physical Sciences and have three years of professional level experience in nuclear services, nuclear plant operation, or nuclear engineering, and the necessary overall nuclear background to determine when to call consultants and contractors for dealing with complex problems beyond the scope of owner-organization expertise.

Mgr/Deputy Radiological Controls (Reports Offsite)

Requirements: Bachelor's degree or the equivalent in a science or engineering subject, including some formal training in radiation protection. Five years of professional experience in applied radiation protection. (Master's degree equivalent to one year experience and Doctor's degree equivalent to two years experience where coursework related to radiation protection is involved.) Three years of this professional experience should be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations.

Chemistry Manager

Requirements: Five years experience in chemistry of which a minimum of one year shall be in radiochemistry at an operating nuclear power

plant. A maximum of four years of this five year experience may be fulfilled by related technical or academic training.

M&C Director, O.C.

Requirements: Seven years of total power plant experience of which one year must be nuclear power plant experience. Two years of academic or related technical training may fulfill two of the remaining six years of required experience.

Shift Technical Advisor

Requirements: Bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.3.2

Each member of the radiation protection organization for which there is a comparable position described in ANSI N18.1-1971 shall meet or exceed the minimum qualifications specified therein, or in the case of radiation protection technicians, they shall have at least one year's continuous experience in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations, and shall have been certified by the Mgr/Deputy Radiological Controls, as qualified to perform assigned functions. This certification must be based on an NRC approved, documented program consisting of classroom training with appropriate examinations and documented positive findings by responsible supervision that the individual has demonstrated his ability to perform each specified procedure and assigned function with an understanding of its basis and purpose.

6.4 TRAINING

6.4.1

A retraining program for operators shall be maintained under the direction of the Manager Plant Training Oyster Creek and shall meet the requirements and recommendation of Appendix A of 10CFR Part 55. Replacement training programs, the content of which shall meet the requirements of 10CFR Part 55, shall be conducted under the direction of the Manager Plant Training Oyster Creek for licensed operators and Senior Reactor Operators.

6.4.2

A training program for the Fire Brigade shall be maintained under the direction of the Manager Plant Training Oyster Creek.

6.7.1

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

- a. If any Safety Limit is exceeded, the reactor shall be shut down immediately until the Commission authorizes the resumption of operation.
- b. The Safety Limit violation shall be reported to the Commission and the Vice President & Director Oyster Creek.
- c. A Safety Limit Violation Report shall be prepared. The report shall be submitted to the Vice President & Director Oyster Creek. 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 within 10 days of the violation.

6.8 PROCEDURES

6.8.1

Written procedures shall be established, implemented, and maintained that meet or exceed the requirements of Section 5.2 and 5.3 of American National Standard N18.7-1976 and Appendix "A" of the Nuclear Regulatory Commission's Regulatory Guide 1.33-1972 except as provided in 6.8.2 and 6.8.3 below.

6.8.2

Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed as described in 6.5.1.1 and approved as described in 6.5.1 prior to implementation and periodically as specified in the Administrative Procedures.

6.8.3

Temporary changes to procedures 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of GPUNC Management Staff authorized under Section 6.5.1.12 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of facility systems or equipment, at least one of these individuals shall be a member of facility management or supervision holding a Senior Reactor Operator's License on the facility.
- c. The change is documented, subsequently reviewed and approved as described in 6.8.2 within 14 days of implementation.

In addition to the applicable reporting requirements of 10 CFR, the following identified reports shall be submitted to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

6.9.1 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 FSAR 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 specified 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.

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c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly

20 estimates of the likely resultant exposure to individuals and to population groups, and assumptions upon which estimates are based shall be provided.

(c). If statistically significant variations of offsite environmental concentrations with time are observed, correlation of these results with effluent release shall be provided.

(d). Results of required leak tests performed on sealed sources if the tests reveal the presence of 0.005 microcuries or more of removeable contamination.

d. Inoperable Fire Protection Equipment (3.12)

e. Core Spray Sparger Inservice Inspection (Table 4.3.1-9)

Prior to startup of each cycle, a special report presenting the results of the inservice inspection of the Core Spray Spargers during each refueling outage shall be submitted to the Commission for review.

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- b. Records and logs of principle maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. Reportable occurrence reports.
- d. Records of surveillance activities, inspections and calibrations required by these technical specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to operating procedures.
- g. Records of radioactive shipments.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2

The following records shall be retained for the duration of the

Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to these technical specifications.
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- j. Records of reviews by the Independent Onsite Safety Review Group.
- k. Records for Environmental Qualification which are covered under the provisions of paragraph 6.14

6.10.3

Quality Assurance Records shall be retained as specified by the Quality Assurance Plan.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 (Deleted)