

## 5.0 ADMINISTRATIVE CONTROLS

### Responsibilities

5.5.1.6 The Plant Review Committee shall be responsible for:

- a. Review of 1) all procedures required by Specification 5.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Manager - Fort Calhoun Station 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 and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Division Manager - Nuclear Operations and to the Chairman of the Safety Audit and Review Committee.
- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Safety Audit and Review Committee.
- h. Review of the Site Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Safety Audit and Review Committee.
- i. Review of the Site Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Safety Audit and Review Committee.
- j. Review of all Reportable Events.

### Authority

5.5.1.7 The Plant Review Committee shall:

- a. Recommend in writing to the Manager - Fort Calhoun Station approval or disapproval of items considered under 5.5.1.6(a) through (d) above.

ADMINISTRATIVE CONTROLSResponsibilities

5.5.1.6 The Plant Review Committee shall be responsible for:

- a. Review of (1) Administrative Controls Standing Orders and changes thereto, (2) procedures required by Specification 5.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to procedures required by Specification 5.8 and requiring a 10 CFR 50.59 safety evaluation;
- 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 and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Division Manager - Nuclear Operations and to the Chairman of the Safety Audit and Review Committee.
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- 5.5.1.7 b. Render determinations in writing with regard to whether or not each item considered under 5.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide immediate written notification to the Division Manager - Nuclear Operations and the Safety Audit and Review Committee of disagreement between the Plant Review Committee and the Manager - Fort Calhoun Station; however, the Manager - Fort Calhoun Station shall have responsibility for resolution of such disagreements pursuant to 5.1.1 above.

### Records

- 5.5.1.8 The Plant Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Division Manager - Nuclear Operations and Chairman of the Safety Audit and Review Committee.

## 5.5.2 Safety Audit and Review Committee (SARC)

### Function

- 5.5.2.1 The Safety Audit and Review Committee shall function to provide the independent review and audit of designated activities in the areas of:
- a. nuclear power plant operation
  - b. nuclear engineering
  - c. chemistry and radiochemistry
  - d. metallurgy
  - e. instrumentation and control
  - f. radiological safety
  - g. mechanical and electrical engineering
  - h. quality assurance

### Composition

- 5.5.2.2 The Safety Audit and Review Committee shall be composed of:

Chairman: Division Manager - Nuclear Services  
Member: Senior Vice President  
Member: Division Manager - Nuclear Operations  
Member: Division Manager - Production Engineering  
Member: Manager - Fort Calhoun Station  
Member: Manager - Radiological Services  
Member: Qualified Consultants as Required and as Determined  
by SARC Chairman

## 5.6 Reportable Event Action

### 5.6.1 The following actions shall be taken in the event of a REPORTABLE EVENT:

- a. The Commission shall be notified pursuant to the requirements of 10 CFR 50.72, if applicable.
- b. Each Reportable Event shall be reviewed by the Plant Review Committee and submitted to the Chairman of the Safety Audit and Review Committee and the Division Manager - Nuclear Operations.
- c. Submit reports of Reportable Events pursuant to the requirements of Specification 5.9.2.

## 5.7 Safety Limit Violation

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

- a. The unit shall be placed in at least HOT SHUTDOWN within 1 hour.
- b. The Safety Limit Violations shall be reported to the Division Manager - Nuclear Operations and the the Chairman of the Safety Audit and Review Committee (SARC) within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Review Committee. 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 Chairman of the Safety Audit and Review Committee and the Division Manager - Nuclear Operations within 14 days of the violation.

## 5.8 Procedures

### 5.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the minimum requirements of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33 except as provided in 5.8.2 and 5.8.3 below.

### 5.8.2 Each procedure and administrative policy of 5.8.1 above, and changes thereto, shall be reviewed by the Plant Review Committee and approved by the Manager - Fort Calhoun Station prior to implementation and ~~periodically as set forth in each document.~~

### 5.8.3 Temporary changes to procedures of 5.8.1 above may be made provided:



## 5.6 Reportable Event Action

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- a. The Commission shall be notified pursuant to the requirements of 10 CFR 50.72, if applicable.
- b. Each Reportable Event shall be reviewed by the Plant Review Committee and submitted to the Chairman of the Safety Audit and Review Committee and the Division Manager - Nuclear Operations.
- c. Submit reports of Reportable Events pursuant to the requirements of Specification 5.9.2.

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- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Review Committee. 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 Chairman of the Safety Audit and Review Committee and the Division Manager - Nuclear Operations within 14 days of the violation.

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5.8.2 Each procedure of Specification 5.8.1, and changes thereto, and any other procedure or procedure change that the Manager - Fort Calhoun Station determines to affect nuclear safety, shall be reviewed and approved as described below, prior to implementation.

5.8.2.1 Each procedure, or change thereto shall be reviewed by a Qualified Reviewer (QR) who is knowledgeable in the functional area affected but is not the individual preparer. The QR may be from the same line-organization as the preparer. The QR shall render a determination in writing of whether or not cross-disciplinary review of a new procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

- 5.8.2.2 Each procedure, or change thereto shall be reviewed by the Manager/Supervisor designated by Administrative Controls Standing Orders as the responsible Manager/Supervisor for that procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new procedure, or change thereto shall be approved by the responsible Manager/Supervisor or the Manager-Fort Calhoun Station or designated alternate, prior to implementation. Administrative Controls Standing Orders, the Site Security Plan and Implementing Procedures, and the Emergency Plan and Implementing Procedures shall be reviewed in accordance with Specification 5.5.1.6 and approved by the Manager-Fort Calhoun Station or his designated alternate.
- 5.8.2.3 If the responsible Manager/Supervisor determines that a procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Manager/Supervisor shall render a determination in writing of whether or not the new procedure, or change thereto involves an Unreviewed Safety Question (USQ) and shall forward the new procedure, or change thereto with the associated safety evaluation to the PRC for review in accordance with Specification 5.5.1.6.a. If a USQ is involved, NRC approval is required prior to implementation of the new procedure, or change.
- 5.8.2.4 Personnel recommended to be QRs shall be reviewed by the PRC and approved and designated as such by the PRC Chairman. The responsible Managers/Supervisors shall ensure that a sufficient complement of QRs for their functional area is maintained in accordance with Administrative Controls Standing Orders.
- 5.8.2.5 Each procedure of Specification 5.8.1 shall be reviewed periodically as set forth in Administrative Controls Standing Orders.
- 5.8.2.6 Records documenting the activities performed under Specifications 5.8.2.1 through 5.8.2.4 shall be maintained in accordance with Specification 5.10.
- 5.8.3 Temporary changes to procedures of 5.8.1 above may be made provided:

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- 3.3.3 a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License. ~~on the unit affected.~~
- c. The change is documented, reviewed by the ~~Plant Review Committee and approved by the Manager - Fort Calhoun Station within 14 days of implementation.~~
- 3.3.4 Written procedures approved per 5.8.2 above shall be implemented which govern the selection of fuel assemblies to be placed in Region 2 of the spent fuel racks (Technical Specification 2.8(12)). These procedures shall require an independent verification of initial enrichment requirements and fuel burnup calculations for a fuel bundle to assure the "acceptance" criteria for placement in Region 2 are met. This independent verification shall be performed by individuals or groups other than those who performed the initial acceptance criteria assessment, but who may be from the same organization.

## 3.9

Reporting Requirements

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

## 3.9.1

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 USAR 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 specific details required in license conditions based on other commitments shall be included in this report.

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- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License.
- c. The change is documented, reviewed by a Qualified Reviewer and approved by either the Manager - Fort Calhoun Station or his designated alternate or the Manager/Supervisor designated by Administrative Controls Standing Orders as the responsible Manager/Supervisor for that procedure within 14 days of implementation.

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- c. Provide immediate written notification to the Division Manager - Nuclear Operations and the Safety Audit and Review Committee of disagreement between the Plant Review Committee and the Manager - Fort Calhoun Station; however, the Manager - Fort Calhoun Station shall have responsibility for resolution of such disagreements pursuant to 5.1.1 above.

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  - g. mechanical and electrical engineering
  - h. quality assurance

**Composition**

- 5.5.2.2 The Safety Audit and Review Committee shall be composed of:

Chairman: Division Manager - Nuclear Services  
 Member: Senior Vice President  
 Member: Division Manager - Nuclear Operations  
 Member: Division Manager - Production Engineering  
 Member: Manager - Fort Calhoun Station  
 Member: Manager - Radiological Services  
 Member: Qualified Consultants as Required and as Determined by SARC Chairman

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- 5.8.2.2 Each procedure, or change thereto shall be reviewed by the Manager/Supervisor designated by Administrative Controls Standing Orders as the responsible Manager/Supervisor for that procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new procedure, or change thereto shall be approved by the responsible Manager/Supervisor or the Manager-Fort Calhoun Station or designated alternate, prior to implementation. Administrative Controls Standing Orders, the Site Security Plan and Implementing Procedures, and the Emergency Plan and Implementing Procedures shall be reviewed in accordance with Specification 5.5.1.6 and approved by the Manager-Fort Calhoun Station or his designated alternate.
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- 5.8.3 Temporary changes to procedures of 5.8.1 above may be made provided:



**ADMINISTRATIVE CONTROLS**

5.8.3

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License.
- c. The change is documented, reviewed by a Qualified Reviewer and approved by either the Manager - Fort Calhoun Station or his designated alternate or the Manager/Supervisor designated by Administrative Controls Standing Orders as the responsible Manager/Supervisor for that procedure within 14 days of implementation.

5.8.4

Written procedures approved per 5.8.2 above shall be implemented which govern the selection of fuel assemblies to be placed in Region 2 of the spent fuel racks (Technical Specification 2.8(12)). These procedures shall require an independent verification of initial enrichment requirements and fuel burnup calculations for a fuel bundle to assure the "acceptance" criteria for placement in Region 2 are met. This independent verification shall be performed by individuals or groups other than those who performed the initial acceptance criteria assessment, but who may be from the same organization.

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ATTACHMENT B

## DISCUSSION, JUSTIFICATION, AND NO SIGNIFICANT HAZARDS CONSIDERATION

The Omaha Public Power District proposes to revise Fort Calhoun Station Unit No. 1 Technical Specifications 5.5 and 5.8 to reflect the implementation of a Qualified Reviewer (QR) Program for the review and approval of new procedures, and changes thereto at Fort Calhoun Station.

The Change Request provides discussion and justification of the proposed TS changes, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

## DISCUSSION AND JUSTIFICATION

The Qualified Reviewer (QR) Program is a procedural review and approval process wherein qualified reviewers perform a review function and designated Managers/Supervisors perform an approval function for new procedures, and changes thereto. This program has been previously approved by the NRC for other nuclear facilities including the Philadelphia Electric Company (PECo), Limerick Generating Station and Peach Bottom facilities.

Issues of importance under the QR program are:

- The Plant Review Committee (PRC) will no longer be required to render a determination as to whether or not a new procedure, or change thereto constitutes an Unreviewed Safety Question (USQ) in accordance with 10 CFR 50.59 and
- The PRC will no longer be required to review and recommend approval/disapproval of certain types of procedures or procedure changes to the Manager-Fort Calhoun Station.

The responsibility and authority to perform these functions will be transferred to responsible Managers/Supervisors designated by the Manager-Fort Calhoun Station.

#### DISCUSSION AND JUSTIFICATION (CONTINUED)

A brief description of the development and implementation of this program at Fort Calhoun Station is provided below.

- The PRC Chairman will approve plant personnel recommended to be Qualified Reviewers (QRs) for specific classes of procedures.
- The QR will be an individual knowledgeable in the functional area affected and may be from the same organization, but cannot be the individual preparer.
- Selected Standing Orders will be reclassified as Administrative Controls Standing Orders.
- An Administrative Control Standing Order will be developed to implement the Qualified Reviewer Program.
- Standing Orders which are impacted by the adoption of the Qualified Reviewer Program will be identified and revised.
- The Manager-Fort Calhoun Station, as authorized by Administrative Controls Standing Orders, will appoint Managers/Supervisors to be responsible for approving classes of procedures. The appointed Manager/Supervisor will be the individual responsible for, and cognizant of, the affected functional area.



#### DISCUSSION AND JUSTIFICATION (CONTINUED)

- Each new procedure, or change thereto will be reviewed by the designated QR. The QR determines when a cross-disciplinary review by other personnel is necessary prior to approval. The new procedure, or change thereto and accompanying 10 CFR 50.59 Review documentation (i.e., evaluation of the proposed change or new procedure in accordance with 10 CFR 50.59) is reviewed by the responsible Manager/Supervisor, including a determination as to whether a 10 CFR 50.59 safety evaluation is required or not. If not, the new procedure, or change thereto is then approved by the responsible Manager/Supervisor or the Manager-Fort Calhoun Station or his designated alternate. If a 10 CFR 50.59 safety evaluation is required, the entire new procedure, or change package, including the 10 CFR 50.59 safety evaluation, must be reviewed by the PRC.
- PRC continues to be responsible for the review and recommendation for approval/disapproval of Administrative Controls Standing Orders, and any new procedure, or change thereto that requires an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) be performed.
- In addition to Administrative Controls Standing Orders, the Manager-Fort Calhoun Station will continue to be responsible for the approval of Security Plan and Implementing Procedures, Emergency Plan and Implementing Procedures, and any new procedure, or change thereto that requires an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) be performed.
- Temporary procedure changes (TPCs) will be implemented as before, however, the TPC will be reviewed by the designated QR (including a cross-disciplinary review, if necessary) and approved by the Manager-Fort Calhoun Station or his designated alternate or responsible Manager/Supervisor, as appropriate, within 14 days of implementation.

#### DISCUSSION AND JUSTIFICATION (CONTINUED)

The proposed changes are administrative in nature. The institution of the QR Program will improve the effectiveness of the PRC by concentrating on issues important to safety. There are no changes to plant equipment, plant design, limiting safety system settings, or plant system operation. The QR Program requires review prior to approval of any new procedure or procedure change by a qualified individual (other than the preparer) who is knowledgeable in the functional area affected. The program will be controlled by Administrative Controls Standing Orders which will continue to be reviewed by the PRC and approved by the Manager-Fort Calhoun Station or his designated alternate. The PRC will continue to review those new procedures, and changes thereto for which an unreviewed safety question determination (i.e., 10 CFR 50.59 safety question) is required to be performed. Therefore, the proposed administrative changes will not decrease the safety oversight function which the PRC performs.

#### BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

The proposed change to the Fort Calhoun Station Technical Specifications, which reflect implementation of a QR Program, does not constitute a Significant Hazards Consideration. In support of this conclusion, an evaluation of each of the three standards as set forth in 10 CFR 50.92 is provided below.

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is administrative in nature and provides for (1) procedural reviews through the use of qualified personnel designated by the PRC Chairman and (2) procedural approval through the use of Managers/Supervisors designated by the Manager-Fort Calhoun Station, as authorized by Administrative Controls Standing Orders upon their development and approval. As part of this program, the QR will be required to consider, document, and implement necessary cross-discipline review prior to approval. The program will be controlled by Administrative Controls Standing Orders which will be reviewed by the PRC and approved by the Manager-Fort Calhoun Station. The PRC will continue to review new procedures, and changes thereto for which an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) is required to be performed. Implementing the proposed administrative change will not decrease the safety review function currently performed by the PRC. The proposed change requires review of any new procedure and procedure change by a qualified individual (other than the preparer) who is knowledgeable in the functional area affected. The proposed change does not affect any plant hardware, plant design, limiting safety system settings, or plant systems, and therefore, does not alter or add any initiating parameters that would cause a significant increase in the probability or consequences of an accident previously evaluated.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION (CONTINUED)

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed Technical Specifications change will implement a procedural review and approval process and is strictly administrative in nature. The QR Program will be controlled by Administrative Controls Standing Orders. These Standing Orders will be reviewed by the PRC and approved by the Manager-Fort Calhoun Station. The PRC will continue to review those new procedures and changes thereto for which an unreviewed safety question determination (i.e., 10 CFR 50.59) is required to be performed. Therefore, the proposed administrative change does not reduce the safety review function performed by the PRC. The proposed change does not involve physical changes to the plant, changes to setpoints, or operating parameters. There are no potential initiating events that would result in the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) Involve a significant reduction in a margin of safety.

The proposed change is administrative in nature and is limited to (1) the transfer of procedure review responsibilities to designated Qualified Reviewers and (2) the transfer of procedure approval responsibilities to designated Managers/Supervisors. The PRC will continue to review and the Manager-Fort Calhoun Station will continue to approve those new procedures and changes thereto for which an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) is required to be performed. It is therefore concluded that the proposed change does not involve a significant reduction in a margin of safety.



BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION (CONTINUED)

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards consideration. Example (i) relates to a purely administrative change to the Technical Specifications.

The proposed change described above is similar to Example (i) in that the proposed change is strictly administrative in nature.

Therefore, based on the above considerations, it is OPPD's position that this proposed amendment does not involve a significant hazards consideration as defined by 10 CFR 50.92 and the proposed changes will not result in a condition which significantly alters the impact of the Station on the environment. Thus, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10) and pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared.