

# SAXTON NUCLEAR

Saxton Nuclear Experimental Corporation  
Policy and Procedure Manual

Number

6575-ADM-4500.07

Title

SNEC Procedure Development, Change Requests and  
Safety Reviews

Revision No.

0

Applicability/Scope

All Saxton activities

Responsible Office

6575

Effective Date

11/14/95

This document is within QA plan scope

X

Yes

No

Safety Reviews Required

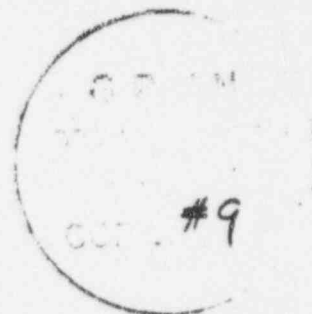
X

Yes

No

## List of Effective Pages

Page	Revision	Page	Revision	Page	Revision	Page	Revision
1.0	0	E1-1	0	E5-1	0		
2.0	0	E2-1	0	E6-1	0		
3.0	0	E2-2	0	E7-1	0		
4.0	0	E3-1	0	E8-1	0		
5.0	0	E3-2	0				
6.0	0	E3-3	0				
7.0	0	E3-4	0				
8.0	0	E4-1	0				
9.0	0	E4-2	0				
10.0	0	E4-3	0				
11.0	0	E4-4	0				
12.0	0	E4-5	0				
13.0	0	E4-6	0				



	Signature	Date
Originator	E.A. Cury	11-7-95
Technical Review (RTR)	R. Holmes	11/7/95
Saxton Site Supervisor	/S/ Perry G. Carmel	11/09/95
Manager, Decommissioning Projects	J. Bay	11/7/95
Saxton Radiation Safety Officer	Ant. H. Payne	11/7/95
Nuclear Safety Assessment Manager	J. King	11/3/95
Manager, Environmental Controls	William Cressler	9 NOV 95
Program Director, SNEC	R. H. Kuhn	11/7/95

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## 1.0 PURPOSE

To establish a procedure to implement the SNEC Document Preparation, Review and Approval Process by identifying the actions necessary for the preparation, review and approval of procedures and other types of documents. Existing approved GPUN Corporate/Division level procedures, plans, policies and documents are authorized for use at Saxton or in conjunction with Saxton activities.

## 2.0 APPLICABILITY/SCOPE

This procedure applies to all personnel who prepare, review or approve documents that pertain to SNEC activities.

## 3.0 DEFINITIONS

### 3.1 Environmental Determination

A determination of whether the activity as outlined by a document:

3.1.1 Meets the minimum requirements of Technical Specifications or documents that govern SNEC activities and/or

3.1.2 Involves any Potential Environmental Impact, as described in Section 3.2.

### 3.2 Potential Environmental Impact

A possible effect or influence on the environment resulting from a proposed activity, change, facility or process modification, production increase, test or experiment. The following are examples of potential environmental impacts:

3.2.1 A release or potential release to the environment.

3.2.2 A change in any systems, components or actions which affect the control of monitoring of actual or potential releases of radioactive or nonradioactive materials to the environment.

3.2.3 A physical or chemical change in the characteristics of plant effluents, withdrawals or other plant interfaces with the environment.

3.2.4 Disposal or storage for disposal of radioactive or non-radioactive waste material.

3.2.5 Endangering the health and safety of the public or workers.

3.2.6 Endangering the health of plants and animals.

3.2.7 Erosion of the soil or sediment on or surrounding the SNEC site.

### 3.3 Environmental Evaluation

A written assessment of an activity which provides the basis for determining if the activity can be implemented without an environmental impact.

**3.4 Safety Determination**

A determination of whether an activity as implemented by a particular document involves:

3.4.1 Any potential adverse impact on nuclear safety or safe plant operations, or

3.4.2 A change to any of the following:

- ① The Technical Specifications/License
- ② The system/component description in the Safety Analysis Report (SAR),
- ③ The procedural/operating description in the SAR.

3.4.3 A change which involves a test or experiment not described in the SAR, or

3.4.4 The possibility of an Unreviewed Safety Question

**3.5 Safety Evaluation**

A written assessment of a document which provides the basis for determining whether the activity can be implemented without adversely affecting nuclear safety.

**3.6 Independent Safety Reviewer (ISR)**

The certified individual who is responsible for the performance of a Safety Review independent of the originator and Responsible Technical Reviewer (RTR). Certification shall be based on meeting the qualifications and training requirements of 1000-ADM-1291.01 (Safety Review Process). If the Independent Safety Review is accomplished by more than one person, the ISR is the individual whose signature attests that the review has been adequately performed (Reference 6.3).

**3.7 Responsible Technical Reviewer (RTR)**

The certified individual who is responsible for the performance of a Technical Review independent of the originator. Certification shall be based on meeting the qualifications and training requirements of 1000-ADM-1291.01 (Safety Review Process). If the Technical Review is accomplished by more than one person, the RTR is the individual whose signature attests that the review has been adequately performed (Reference 6.3).

**NOTE**

A list of current certified Independent Safety Reviewers (ISRs) and Responsible Technical Reviewers (RTRs) and their area of cognizance may be found in the SNEC Document Evaluation Book (DEB).

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## 3.8 Within the Scope of QA

Reference 6.1 describes the activities and procedures designated within the scope of the SNEC QA program. Reference 6.2 further delineates the QA plan requirements and activities within the QA plant scope.

## 3.9 Non-Substantive Changes

Revisions which do not affect the activities associated with the document or the document's meaning or intent. Examples follow:

3.9.1 Correction to spelling.

3.9.2 Adding but not deleting sign-off spaces.

3.9.3 Blocking in notes, cautions, etc.

3.9.4 Changes in corporate or personal titles which do not reassign responsibilities and which are not referred to in the Technical Specifications.

3.9.5 Changes to nomenclature or editorial changes which clearly do not change function, meaning or intent.

## 3.10 Procedure Numbering

Until such time as all SNEC Procedures have been renumbered and reference sections changed, procedure numbers starting with 9400-, 6675- and 6575- shall be considered the same (i.e., 9400-ADM-4500.22, 6675-ADM-4500.22 referenced in any procedure will be referring to 6575-ADM-4500.22).

## 4.0 PROCEDURE

### 4.1 Originating New Procedures

4.1.1 The originator shall obtain a document number from the Procedure Coordinator and complete Exhibit 2 or 2a.

4.1.2 SNEC procedures shall be formatted as follows:

4.1.2.1 The cover page shall be in accordance with Exhibit 8.

4.1.2.2 Section 1.0 shall cover the Purpose of the document.

4.1.2.3 Section 2.0 shall cover Applicability/Scope.

4.1.2.4 Section 3.0 shall cover Definitions, if necessary.

4.1.2.5 Section 4.0 shall be the Procedure text itself.

4.1.2.6 Section 5.0 shall cover Responsibilities.



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- 4.1.2.7 Section 6.0 shall list any References.
- 4.1.2.8 Section 7.0 shall contain any Exhibits.
- 4.1.3 Drafting Procedures
  - 4.1.3.1 In order to complete the cover page of the document, decide if the document is, "within the scope of QA" (Reference 3.8).
  - 4.1.3.2 Write the procedure in single, short steps if possible.
  - 4.1.3.3 Obtain cross-disciplinary input as deemed necessary.
  - 4.1.3.4 Provide enough guidance to permit implementation by the target group.
  - 4.1.3.5 Assure procedure does not conflict with existing approved procedures/programs.
  - 4.1.3.6 Assure procedure complies with the appropriate regulations (e.g., Tech Specs or Federal or State permits/licenses).
  - 4.1.3.7 Provide flexibility in areas where possible while maintaining the intent of the procedure.
  - 4.1.3.8 The Originator may also send drafts for inhouse technical review.
- 4.1.4 Perform a Safety/Environmental Determination, (and Evaluations if required) per Section 4.2 using Exhibit 3.
- 4.1.5 Select a Responsible Technical Reviewer according to the Matrix of Exhibit 4 and submit the package for technical review.
- 4.1.6 If a Safety Evaluation is done, submit the package for a Safety Review. Select a Safety Reviewer according to the Matrix of Exhibit 4.

## NOTE

SNEC Safety Reviews are required for documents/changes if a Safety Evaluation has been performed. A Safety Review is not required if only an Environmental Evaluation has been done.

- 4.1.7 Determine individuals/groups that must concur. As a minimum organizations assigned responsibilities in the procedure must concur. Individuals/groups that must sign for concurrence shall be given a draft copy for review so that their comments may be considered for incorporation into the final draft. External review groups should be given a Document Review Sheet, Exhibit 7.

- 4.1.8 The originator shall attempt to resolve the comments made during the review process. Disagreements that cannot be resolved by the originator shall be referred to successively higher levels of authority. If agreement cannot be reached, final resolution shall be determined by the party designated to approve in the Review and Approval Matrix, Exhibit 4.
- 4.1.9 Submit the final draft of the document and the complete package to the Procedure Coordinator. The Procedure Coordinator shall:
- ① Transmit the package for typing
  - ② Obtain the final signatures
  - ③ Forward the document to Document Controls for distribution

**NOTE**

Ensure a copy of the entire package has been maintained for departmental procedure records.

**4.2 Safety and Environmental Reviews****4.2.1 Guidance for completing Exhibits 3, 3a and 3b.**

- 4.2.1.1 The Originator/Preparer shall complete the Safety and Environmental Determination Form, (Exhibit 3), for all new documents and for substantive changes to existing documents, according to Sections 4.2.2 and 4.2.3.
- 4.2.1.2 The determinations are to show the reviewers and approvers that potential safety issues and environmental concerns have been recognized by considering:
- ① The effect of actions that are outlined in the procedure/document as they pertain to safety or environmental concerns.
  - ② Compliance with Technical Specifications.
- 4.2.1.3 If any question on Exhibit 3 or 3a is answered "yes", the originator shall prepare and attach the appropriate written evaluations to Exhibit 3 per Sections 4.2.4 and/or 4.2.5.
- 4.2.1.4 If the Evaluation does not prove elimination or minimization of the concern, the document/document change cannot be implemented.

**4.2.2 Environmental Determination**

Question 1 pertains to the Environmental Determination as defined in Section 3.1. Any "yes" answer on the Environmental Determination requires an Environmental Evaluation per Section 4.2.5. Consult Environmental Affairs/Licensing for assistance in the Environmental Evaluation.

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## 4.2.3 Safety Determination

Questions 4, 5, 6 and 7 of Exhibit 3 pertain to the Safety Determination as defined in Section 3.4. If any of the answers to Questions 4, 5, 6 or 7 are "yes", complete the Safety Evaluation on Exhibit 3b which includes 50.59 considerations and determination of an unreviewed safety question.

## 4.2.4 Safety Evaluation

The Safety Evaluation (Exhibit 3b) is a written explanation of all "yes" answers, an explanation of how the activity will be implemented without adversely affecting nuclear safety and any calculations or other documents used to support the evaluation. Attach to Exhibit 3b.

## 4.2.5 Environmental Evaluations

The Environmental Evaluation shall be a written explanation of all "yes" answers on the Environmental Determination Form, and evaluation of how the activity will be implemented without adversely impacting the environment and any calculations or other documents used to support the evaluation. Consider both radiological and non-radiological releases. Attach the evaluation to Exhibit 3b.

## 4.3 Responsible Technical Reviewer

4.3.1 Review the entire document package including the procedure text, the completed Exhibit 3 and any attached written evaluations.

4.3.2 Sign the attached documents where required. The signature of the Responsible Technical Reviewer signifies concurrence that technical, safety and environmental considerations have been properly addressed, and that all determinations and evaluations are complete and accurate. The signature also indicates that the RTR was independent of the Originator and releases the document for further processing.

## 4.4 Independent Safety Reviewer

4.4.1 Review the package to confirm that nuclear safety aspects of the document have been properly addressed and the Safety Evaluation is complete and accurate.

4.4.2 Obtain cross-disciplinary inputs and specialist assistance as needed to perform the Safety Review.

4.4.3 Sign the attached documents where required. The signature also attests that the ISR was independent of the Originator and the RTR.



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## 4.5 Procedure Change Requests

A Procedure Change Request (PCR) is used when the change is not required immediately and the change is permanent in nature. Document changes and/or general revisions shall be initiated by use of Exhibit 2, "Procedure Change Request Form".

4.5.1 The Originator of the change shall obtain a PCR number from the Procedure Coordinator.

4.5.2 The Procedure Coordinator shall complete the PCR log, Exhibit 5.

4.5.3 The Originator shall complete Exhibit 2.

4.5.3.1 If the answer to question 1 is "no" make the revision and submit the draft package for review and approval.

### NOTE

Verify that the document has been properly classified.

4.5.3.2 If the answer to question 1 is "yes", complete Exhibit 3 in accordance with Section 4.2.

4.5.3.3 Submit all PCR documents for the required reviews in accordance with Sections 4.1.5 through 4.1.8.

4.5.3.4 Submit the package to the Procedure Coordinator for the completion of duties as outlined in Section 4.1.9.

### NOTE

Ensure a copy of the entire package has been maintained for departmental procedure records.

### NOTE

Nonsubstantive revisions only require Originator and Approver signatures. However, the cover page needs to maintain the concurring organizational element status. Therefore, the concurring signature titles shall be left intact from the old revision. The signature blocks shall be marked as "N/A". The date of the previous review signature shall be filled in on the date line for each concurring title marked as "N/A".

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## 4.6 Temporary Change Notices

4.6.1 Temporary Change Notices (TCN's) provide the ability to make changes to a procedure in a short amount of time. The use of TCN's shall be limited to the following cases:

4.6.1.1 When the change is of a temporary nature and should not result in a permanent revision, or

4.6.1.2 When time or program conditions do not permit the use of a PCR. However, if the change is permanent a PCR shall be submitted, by the Originator of the TCN, and approved within 90 days.

## 4.6.2 Preparation of TCN's

4.6.2.1 The Originator shall obtain a TCN number from the Procedure Coordinator.

4.6.2.2 The Procedure Coordinator shall complete the TCN Log, Exhibit 6.

4.6.2.3 The Originator shall complete Part (a) of Exhibit 2a.

4.6.2.4 If the answer to question 1 is "no" make the revision and submit the draft package for review and approval. If the answer to question 1 is "yes", complete Exhibit 3 in accordance with Section 4.2.

4.6.2.5 In Exhibit 2a, provide a general description of the change(s). Reference affected pages and section numbers.

4.6.2.6 Attach an edited copy of the affected pages of the procedure to Exhibit 2a.

4.6.2.7 The review requirements for TCN's are the same as those outlined in Sections 4.1.4 through 4.1.6.

4.6.2.8 The Originator is responsible for obtaining all review and approval signatures.

4.6.2.9 The TCN shall become effective with the implementing approval signature. The Originator shall then make a working copy of the TCN package for use by the target group.

4.6.2.10 The original TCN packet shall be forwarded to the Procedure Coordinator. A copy shall be transmitted to Document Control for distribution.

## 4.6.3 Cancellation of TCN's

4.6.3.1 A TCN is good for a maximum of 90 days and can be cancelled by one of the following:

- ① Incorporation into an implemented procedure change request (PCR)
- ② Expiration date

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## Ⓔ Early cancellation by the Originator

- 4.6.3.2 The Originator is responsible for the cancellation of TCN's.
- 4.6.3.3 The Originator is responsible for tracking his/her TCN expiration date.
- 4.6.3.4 To cancel a TCN, obtain the original package from the Procedure Coordinator and complete Part (b), Exhibit 2a.
- 4.6.3.5 Forward the cancelled TCN package to the Procedure Coordinator for transmittal to Document Control.
- 4.6.3.6 When a PCR which incorporates a TCN is approved, cancel the TCN and submit both packages to the Procedure Coordinator for transmittal to Document Control.

### NOTE

Use the effective date of the new procedure as the cancellation date of the TCN.

## 4.7 Implementing Approval

- 4.7.1 The Implementing Approver will be as described in Exhibit 4.
- 4.7.2 The Implementing Approver, along with the Originator, will establish the effective date of the document at the time of final signature.

### NOTE

When choosing an effective date consider the time necessary for final distribution.

## 4.8 Existing GPUN Procedures

- 4.8.1 GPUN departmental level and specialized procedures, plans, policies and documents may be utilized as deemed appropriate for use at or for Saxton activities with the approval of the Program Director, SNEC (or designee) and concurrence of a Responsible Technical Reviewer. A listing of approved documents will be maintained in the SNEC Document Evaluations Book (DEB) which is controlled and distributed by the SNEC procedure coordinator. Once on the approved list, revisions will not affect the status of usage for Saxton activities.

## 5.0 RESPONSIBILITIES

### 5.1 The Originator is responsible for:

- 5.1.1 Preparing a technically adequate document.
- 5.1.2 Obtaining applicable technical, safety and cross-disciplinary reviews as required.

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- 5.1.3 Resolving any comments made during the review process.
- 5.1.4 Completing the Safety/Environmental determination and any required evaluations.
- 5.2 The Responsible Technical Reviewer is responsible for ensuring that:
  - 5.2.1 The activities performed in accordance with the document being reviewed are technically correct and concordant with safe plant operations.
  - 5.2.2 The activities performed in accordance with the document being reviewed meet legally mandated monitoring requirements.
- 5.3 The Independent Safety Reviewer is responsible for ensuring that nuclear safety considerations have been adequately evaluated and are properly addressed in the Safety Evaluation.
- 5.4 The implementing Approver is responsible for:
  - 5.4.1 Ensuring that the administrative requirements of this procedure have been satisfied.
  - 5.4.2 Releasing the document for implementation.
- 5.5 The Procedure Coordinator is responsible for:
  - 5.5.1 Maintaining document logs.
  - 5.5.2 Maintaining procedure records.
  - 5.5.3 Complying with record retention and reporting requirements.
  - 5.5.4 Forwarding documents to Document Control for processing.

## 6.0 REFERENCES

- 6.1 SNEC Technical Specifications
- 6.2 6575-QAP-7200.01, SNEC Quality Assurance Program
- 6.3 1000-ADM-1291.01, Safety Review Process

## 7.0 EXHIBITS

- 7.1 Exhibit 1, "Flow Chart for Safety Review and Approval Process"
- 7.2 Exhibit 2, "Procedure Change Request Form"
- Exhibit 2a, "Temporary Change Notice Form"

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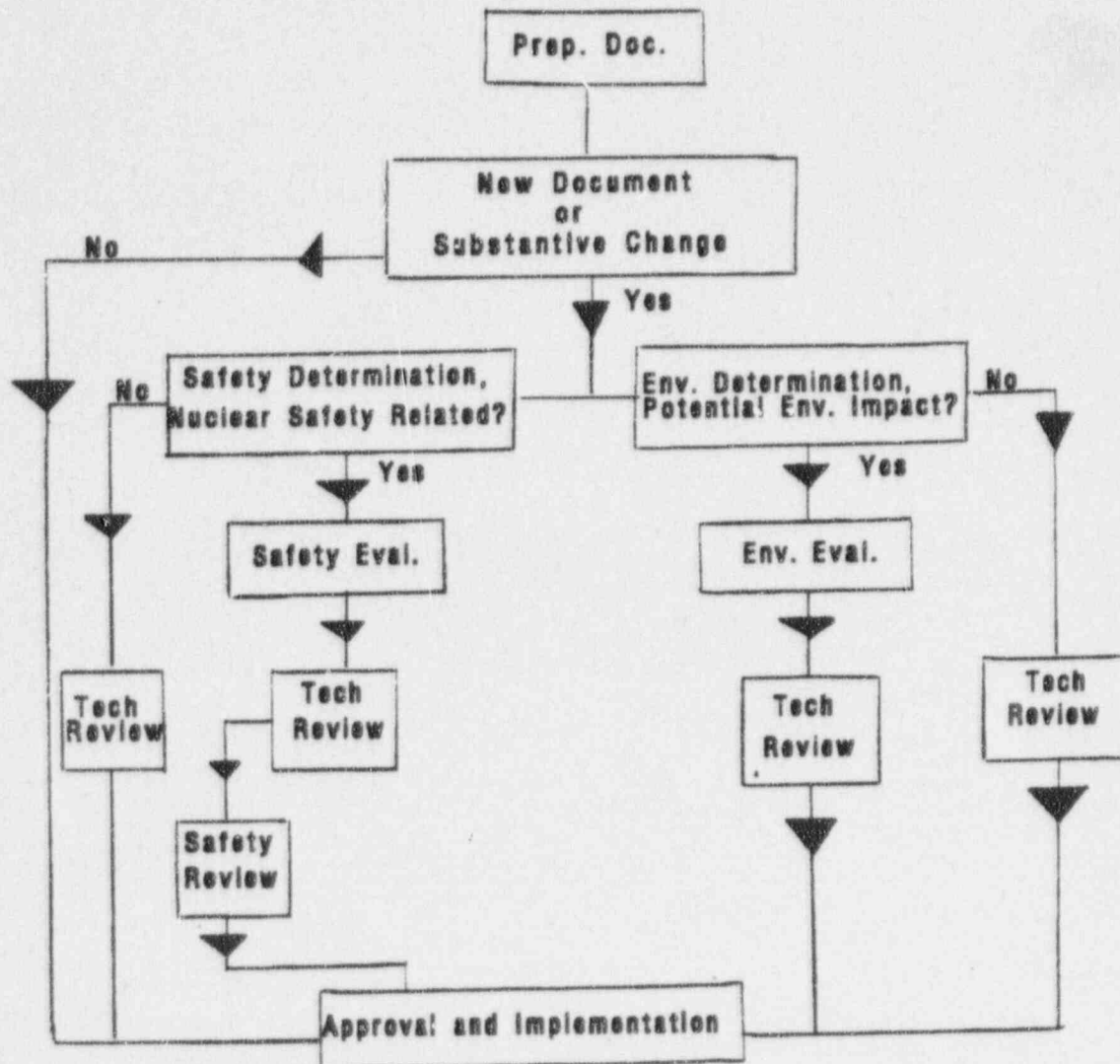
Revision No.

**0**

- 7.3 Exhibit 3, "Safety/Environmental Determination Form"
- Exhibit 3a, "Environmental Determination"
- Exhibit 3b, "Safety Evaluation"
- 7.4 Exhibit 4, "SNEC Review and Approval Matrix"
- 7.5 Exhibit 5, "Procedure Change Request Log"
- 7.6 Exhibit 6, "Temporary Change Notice Log"
- 7.7 Exhibit 7, "Document Review Sheet"
- 7.8 Exhibit 8, "Document Cover Page"



## Flow Chart for Safety Review and Approval Process



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## EXHIBIT 2

### Procedure Change Request Form

#### Section 1

PCR # \_\_\_\_\_

Date \_\_\_\_\_

Procedure No. \_\_\_\_\_

Rev. \_\_\_\_\_

Document Title: \_\_\_\_\_

Circle the appropriate "yes" or "no" answer

- 1) Is this a new procedure or a substantive  
revisor to the document? See Section 3.9  
for examples of nonsubstantive changes.

YES NO

If the answer is "yes", complete Exhibit 3.

If "no", forward the document for implementing  
approval.

- 2) Does this PCR incorporate a TCN?

YES NO

If the answer is "yes", what is the TCN # \_\_\_\_\_

Description of Change:

Originator \_\_\_\_\_ Date \_\_\_\_\_

Technical Review (RTR) \_\_\_\_\_ Date \_\_\_\_\_

Safety Review (ISR) \_\_\_\_\_ Date \_\_\_\_\_

(Other) \_\_\_\_\_ Date \_\_\_\_\_

Implementing Approval \_\_\_\_\_ Date \_\_\_\_\_

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## EXHIBIT 2a

### Temporary Change Notice Form

#### Part (a)

TCN # \_\_\_\_\_

Effective Date \_\_\_\_\_

Procedure No. \_\_\_\_\_

Rev. \_\_\_\_\_

Document Title: \_\_\_\_\_

Reason for Change: \_\_\_\_\_

- 1) Is this a substantive revision to the document?  
See Section 3.9 for examples of non-substantive changes.

YES NO

If the answer is "yes", complete Exhibit 3.

If "no", forward the document for implementing approval

Expiration Date \_\_\_\_\_ (not to exceed 90 days)

#### Part (b)

TCN Cancelled By \_\_\_\_\_

Signature/Date

Reason for Cancellation \_\_\_\_\_ PCR \_\_\_\_\_ Originator \_\_\_\_\_ Expired  
(check one)

Description of change:

Originator \_\_\_\_\_ Date \_\_\_\_\_

Technical Review (RTR) \_\_\_\_\_ Date \_\_\_\_\_

Safety Review (ISR) \_\_\_\_\_ Date \_\_\_\_\_

(Other) \_\_\_\_\_ Date \_\_\_\_\_

Implementing Approval \_\_\_\_\_ Date \_\_\_\_\_

Safety/Environmental Determination and 50.59 Review SNEC	
	Page 1 of _____
Document/Activity Title _____	
Document No. (if applicable) _____	Doc. Rev. No. _____
Type of Activity (modification, procedure, test, experiment, or document): _____	
<p>1. Does this document involve any potential non-nuclear environmental concerns? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>To answer this question, complete the Environmental Determination (ED) form, Exhibit 3a. Any YES answer on the ED form requires an Environmental Impact Assessment by Environmental Controls.</p> <p style="padding-left: 40px;">If in doubt, consult Environmental Controls or Environmental Licensing for assistance.</p> <p>If all answers are NO, further environmental review is not required. In any event, continue with Question 2, below.</p> <p>2. Is this activity/document listed in Exhibit 1 of 6575-QAP-7200.01, SNEC Quality Assurance Program? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>If the answer to question 1 is NO, stop here. This procedure is not applicable and no documentation is required. (If this activity/document is listed in Exh. 1 of 6575-QAP-7200.01 review on a case-by-case basis to determine applicability). If the answer is YES, proceed to question 3.</p> <p>3. Is this a new activity/document or a substantive revision to an activity/document? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>(See Section 3.9 of this procedure for examples of non-substantive changes).</p> <p>If the answer to question 3 is NO, stop here and complete the approval section below. This procedure is not applicable and no documentation is required. If the answer is YES, proceed to answer all remaining questions. These answers become the Safety/Environmental Determination and 50.59 Review.</p> <p>4. Does this activity/document have the potential to adversely affect nuclear safety or safe plant operations? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>5. Does this activity/document require revision of the system/component description of the Technical Specifications or any other part of the SAR? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>6. Does the activity/document require revision of any procedural or operating description of the Technical Specifications or any other part of the SAR? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>7. Are tests or experiments conducted which are not described, the Technical Specifications or any part of the SAR? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p><b>IF ANY OF THE ANSWERS TO QUESTIONS 4, 5, 6, OR 7 ARE YES, PREPARE A WRITTEN SAFETY EVALUATION FORM.</b></p> <p>If the answers to 4, 5, 6, and 7 are NO, this precludes the occurrence of an Unreviewed Safety Question or Technical Specifications change. Provide a written statement in the space provided below (use back of sheet if necessary) to support the determination, and list the documents you checked.</p> <p>NO, because: _____</p> <p>Documents checked: _____</p>	
<b>APPROVALS</b> (print name and sign)	
Originator _____	Date _____
Responsible Technical Reviewer _____	Date _____
Independent Safety Reviewer _____	Date _____
Other Reviewer(s) _____	Date _____





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Safety Evaluation	
ACTIVITY/DOCUMENT TITLE _____ _____	PAGE 2 OF _____
DOCUMENT NO. (if applicable) _____	Rev. No. _____
Type of Activity/Document _____ (Modification, procedure, test, experiment, or document)	
<p>This Safety Evaluation provides the basis for determining whether this activity/document involves an Unreviewed Safety Question or impacts on nuclear safety.</p> <p>Answer the following questions and provide reason(s) for each answer. A simple statement of conclusion in itself is not sufficient. The scope and depth of each reason should be commensurate with the safety significance and complexity of the proposed change.</p> <p>1. Will implementation of the activity/document adversely affect nuclear safety or safe plant operations? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The following questions comprise the 50.59 considerations and evaluation to determine if an Unreviewed Safety Question exists:</p> <p>2. Is the probability of occurrence of the consequences of an accident or malfunction of equipment important to safety previously evaluated in the Safety Analysis Report increased? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>3. Is the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report created? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>4. Is the margin of safety as defined in the basis for any Technical Specification reduced? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If any answer above is "yes" an impact on nuclear safety or an Unreviewed Safety Question exists. If an adverse impact on nuclear safety exists revise or redesign. If an unreviewed safety questions with no adverse impact on nuclear safety exists forward to Licensing with any additional documentation to support a request for NRC approval prior to implementing approval.</p>	
<b>APPROVALS</b> (print name and sign)	<b>Date</b>
Originator	
Responsible Technical Reviewer	
Independent Safety Reviewer	
Other Reviewer(s)	

# SAXTON NUCLEAR

Saxton Nuclear Experimental Corporation  
Policy and Procedure Manual

Number

6575-ADM-4500.07

Title

SNEC Procedure Development, Change Requests and  
Safety Reviews

Revision No.

0

## EXHIBIT 3b (Cont'd)

### SAFETY EVALUATION

Page \_\_\_\_\_ of \_\_\_\_\_

(Continuation Sheet)

## SNEC Review and Approval Matrix

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
I. PLANS/PROCEDURES <sup>(A)</sup> /REVISIONS			
A. ADMINISTRATIVE CONTROLS			
1. Procedure Review and Approval	APPLICABLE DIVISION/DEPT.	APPLICABLE DIVISION/DEPT.	PROGRAM DIRECTOR, SNEC (or DESIGNEE)
2. Temporary Change Method	APPLICABLE DIVISION/DEPT.	APPLICABLE DIVISION/DEPT.	PROGRAM DIRECTOR, SNEC (or DESIGNEE)
3. Equipment Control (Lock & Tag)	APPLICABLE DIVISION/DEPT.	APPLICABLE DIVISION/DEPT.	PROGRAM DIRECTOR, SNEC (or DESIGNEE)
4. Log Entries, Record Retention & Rev. Proc.	APPLICABLE DIVISION/DEPT.	APPLICABLE DIVISION/DEPT.	PROGRAM DIRECTOR, SNEC (or DESIGNEE)
5. Access to Containment	APPLICABLE DIVISION/DEPT.	APPLICABLE DIVISION/DEPT.	PROGRAM DIRECTOR, SNEC (or DESIGNEE)
6. Plant Administrative Procedures that either Assign Responsibilities to Individuals/Depts. or Specify General Requirements of Work Performance	APPLICABLE DIVISION/DEPT.	APPLICABLE DIVISION/DEPT.	PROGRAM DIRECTOR, SNEC (or DESIGNEE)

## SNEC Review and Approval Matrix

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
<b>B. GENERAL PLANT<sup>(B)</sup></b>			
1. System Operating	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
2. Alarm Responses	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
3. Work Instructions	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
4. Chemistry	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
5. Fire Protection	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
<b>C. MAINTENANCE</b>			
1. Calibration	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
2. Control of Measuring & Test Equipment	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
3. Preventive Maintenance	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
4. Corrective Maintenance	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	RAD/ENVIR. CONTROLS OR TECH FUNCTIONS	SITE SUPERVISOR, SNEC (or DESIGNEE)
<b>D. SURVEILLANCE</b>			
1. Surveillance	RAD/ENVIR. CONTROLS <sup>(C)</sup>	RAD/ENVIR. CONTROLS	SITE SUPERVISOR, SNEC (or DESIGNEE)
2. In Service Inspections	RAD/ENVIR. CONTROLS	RAD/ENVIR. CONTROLS	SITE SUPERVISOR, SNEC (or DESIGNEE)

## SNEC Review and Approval Matrix

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
E. RADIOLOGICAL AND ENVIRONMENTAL CONTROLS PROCEDURES			
1. Radiological Controls	RAD CON	RAD CON	PROGRAM DIRECTOR, SNEC
2. Effluent Monitoring	RAD CON	RAD CON	PROGRAM DIRECTOR, SNEC
3. Environmental Monitoring	ENV. CON.	ENV. CON.	MGR. ENV. CON. MGR. ENV. CON.
a. Environ. Programs	ENV. CON.	ENV. CON.	
b. Environ. Lab	ENV. CON./ENV. LAB	ENV. LAB	
F. PLANS/RELATED PROCEDURES <sup>(D)</sup>			
1. Flood Protection Program	TECH FUNCTIONS	TECH FUNCTIONS	APPLICABLE DIVISION DIRECTOR OR DESIGNEE
a. Flood Protection Program Implementing Procedures	TECH FUNCTIONS	TECH FUNCTIONS	APPLICABLE DIVISION DIRECTOR OR DESIGNEE
2. Radioactive Effluent Controls Program	RAD CON	RAD CON	PROGRAM DIRECTOR, SNEC
a. Radioactive Effluent Controls Program Implementing Procedures	RAD CON	RAD CON	PROGRAM DIRECTOR, SNEC
b. Effluent Monitoring	RAD CON	RAD CON	PROGRAM DIRECTOR, SNEC
3. Radiological Environment Monitoring Program	ENV. CON.	ENV. CON.	MANAGER, ENV. CON.
a. Radiological Environment Monitoring Program Implementing Procedures	ENV. CON.	ENV. CON.	MANAGER, ENV. CON.
b. Environmental Monitoring	ENV. CON.	ENV. CON.	MANAGER, ENV. CON.
4. Fire Protection Program	TMI OR TECH FUNCTIONS	TMI OR TECH FUNCTIONS	APPLICABLE DIVISION DIRECTOR OF DESIGNEE
a. Fire Protection Program Implementing Documents	TMI OR TECH FUNCTIONS	TMI OR TECH FUNCTIONS	APPLICABLE DIVISION DIRECTOR OR DESIGNEE
5. SNEC QA Program	NUCLEAR SAFETY ASSESSMENT	NUCLEAR SAFETY ASSESSMENT	DIVISION DIRECTOR AND DIRECTOR NSA CONCUR



## SNEC Review and Approval Matrix

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
F. PLANS/RELATED PROCEDURES <sup>(D)</sup> (Cont'd)			
6. Radiation Protection Program	RAD CON	RAD CON	APPLICABLE DIVISION DIRECTOR OR DESIGNEE
7. Offsite Dose Calculation Manual (ODCM)	RAD CON OR ENV. CON.	RAD CON OR ENV. CON.	PROGRAM DIRECTOR, SNEC
a. ODCM Implementing Rad Con Procedures	RAD CON	RAD CON OR ENV. CON.	PROGRAM DIRECTOR, SNEC
b. ODCM Implementing Env. Con. Procedures	ENV. CON.	RAD CON OR ENV. CON.	PROGRAM DIRECTOR, SNEC

## SNEC Review and Approval Matrix

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
II. CHANGES TO THE FACILITY			
A. DESIGN CHANGES & MODIFICATIONS TO UNIT SYSTEMS & EQUIPMENT			
1. Design changes and modification to Unit Systems and Equipment as described in SAR.	TECH FUNCTIONS OR RAD/ENV. CON.	LICENSING	MANAGER, DECOMMISSIONING PROJECTS
2. Installation Procedures for changes and modifications to Unit Systems and Equipment as described in SAR.	TECH FUNCTIONS OR RAD/ENV. CON.	TECH FUNCTIONS	MANAGER, DECOMMISSIONING PROJECTS
3. Work Procedures and Job Orders	TECH FUNCTIONS OR RAD/ENV. CON.	TECH FUNCTIONS	MANAGER, DECOMMISSIONING PROJECTS
B. Temporary Change to Facility			
1. Applicable Procedures and Documentation	ANY DIVISION (E) (F)	ANY DIVISION (E)	MANAGER, DECOMMISSIONING PROJECTS
III. LICENSING DOCUMENTS			
A. LICENSEE EVENT REPORT	RAD/ENV. CON.	LICENSING (J)	PROGRAM DIRECTOR, SNEC
B. TECH SPECS/LICENSEE CHANGE REQUEST	RAD/ENV. CON OR TECH FUNCTIONS	LICENSING	PROGRAM DIRECTOR, SNEC

## SNEC Review and Approval Matrix

SUBJECT	REVIEW COORDINATOR <sup>(H)</sup>	REVIEWER <sup>(I)</sup>	REQUIREMENT SOURCE
IV. REVIEWS AND EVALUATIONS <sup>(G)</sup>			
A. Violations, deviations, and reportable events which require reporting to the NRC in writing.	DIVISION RESPONSIBLE	ISR <sup>(J)</sup>	SNEC TECHNICAL SPECIFICATIONS
B. Investigation Reports of all violations of Technical Specifications	DIVISION RESPONSIBLE FOR VIOLATION	RTR	SNEC TECHNICAL SPECIFICATIONS
C. Other reviews deemed necessary by an Independent Safety Reviewer	INDEPENDENT SAFETY REVIEWER (ISR)	AS ASSIGNED BY INDEPENDENT SAFETY REVIEWER	SNEC TECHNICAL SPECIFICATIONS
D. Written Summaries of Audit Reports	NUCLEAR SAFETY ASSESSMENT	AS ASSIGNED BY NSA (ISR)	SNEC TECHNICAL SPECIFICATIONS

## NOTES

- (A) See Procedure 1000-ADM-1218.01 for review, concurrence and approval requirements.
- (B) As defined in Division procedures, Tech. Functions will provide an independent review of new procedures and major revisions of existing procedures or upon request.
- (C) As defined in Division procedures.
- (D) Only those procedures specifically identified on the matrix.
- (E) In accord with approved Division procedures.
- (F) Any configuration change to the plant must be communicated to Technical Functions Division.
- (G) Licensing will assign an ISR to the appropriate department.
- (H) Review Coordinator - is responsible to initiate or identify issues of potential safety significance and forward appropriate data to the assigned review organization and ensure that the resulting review is documented, returned and filed.
- (I) Reviewer - is responsible for the Technical Review or Independent Safety Review of assigned reviews.
- (J) ISR to be documented in the form in Exhibit 9 of 1000-ADM-1291.01.



6575-ADM-4500.07  
Revision 0

## Revision 0

[illegible]





EXHIBIT 8

**SAXTON NUCLEAR**

Saxton Nuclear Experimental Corporation  
Policy and Procedure Manual

Number

**6575-ADM-4500.07**

Title

Revision No.

Applicability/Scope

Responsible Office

Effective Date

6575

This document is within QA plan scope  
Safety Reviews Required

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No

List of Effective Pages

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Signature		Date