

- m. Records of the service lives of all hydraulic snubbers on Table 3.16.1 including the date at which the service life commences and associated installation and maintenance records.
- n. Records for Environmental Qualification which are covered under the provision at paragraph 6.15.

#### 6.11 RADIATION PROTECTION PROGRAM

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

#### 6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or alarm signal" required by paragraph 20.203 (c)(2) of 10 CFR 20:

- a. Each High Radiation Area as defined by paragraph 20.202 (b)(3) shall be barricaded and conspicuously posted as a High Radiation Area, and personnel desiring entrance shall obtain a Radiation Work Permit (RWP). Any individual or group of individuals entering a High Radiation Area shall (a) use a continuously indicating dose rate monitoring device or (b) use a radiation dose rate integrating device which alarms at a pre-set dose level (entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them), or (c) assure that a radiological control technician provides positive control over activities within the area and periodic radiation surveillance with a dose rate monitoring instrument.
- b. Any area accessible to personnel where a major portion of the body could receive in any one hour a dose in excess of one thousand mrem shall be locked or guarded to prevent unauthorized entry. The keys to these locked barricades shall be maintained under the administrative control of the Radiological Controls Foreman on duty.

The Radiation Work Permit is not required by Radiological Controls personnel during the performance of their assigned radiation protection duties provided they are following radiological control procedures for entry into High Radiation Areas.

#### 6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 GPU Nuclear Corporation initiated changes to the PCP:

- 1. Shall be submitted to the NRC in the Semiannual Radioactive Effluent Release Report for the period in which the changes were made. This submittal shall contain:
  - a. sufficiently detailed information to justify the changes without benefit of additional or supplemental information;
  - b. a determination that the changes did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and

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