

Attachment IV
Proposed Technical Specification Change

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President Plant Operations ^{Plant Manager} shall be responsible for overall Unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Supervising Operator, under the Shift Supervisor, shall be responsible for the control room command function. A management directive to this effect, signed by the President and Chief Executive Officer shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 Onsite and Operating Corporation Organization

Onsite and operating corporation organizations shall be established for unit operation and corporate management, respectively. The onsite and operating corporation organizations shall include the positions for the activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or equivalent forms of documentation. These requirements shall be documented in the Updated Safety Analysis Report.
- b. The Vice President Plant Operations ^{Plant Manager} shall be responsible for overall unit safe operation and shall have control of those onsite activities necessary for safe operation and maintenance of the plant.
- c. The President and Chief Executive Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out the health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 Unit Staff

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS (Continued)

- b. The position of Superintendent Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager.
- c. The NSRC members shall meet or exceed the requirements of ANSI/ANS 3.1-1981.
- d. The position of Manager Operations shall hold or have previously held a senior reactor operator license for a similar unit (PWR).

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Manager Training and shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1978 with the following exceptions:

- a. The training program for Licensed Operators and Senior Operators shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, and 10 CFR Part 55.
- b. Training shall include familiarization with relevant industry operational experience identified by the ISEG or another plant group.

6.5 REVIEW AND AUDIT

6.5.1 PLANT SAFETY REVIEW COMMITTEE (PSRC)

Plant Manager

FUNCTION

6.5.1.1 The PSRC shall function to advise the Vice President Plant Operations on all matters related to nuclear safety.

COMPOSITION

Plant Manager

6.5.1.2 The Vice President Plant Operations shall designate in writing the Chairman and Alternate Chairman of the PSRC. PSRC membership shall include between six and eight additional members appointed by the Chairman and an additional member appointed by the Vice President Engineering. Selected members shall include, at a minimum, management responsible for the following areas of expertise: operations, maintenance, instrumentation and controls, chemistry, health physics and engineering. A single individual may cover multiple disciplines.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PSRC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PSRC activities at any one time.**

**Except for the alternate for Engineering who is appointed by the Vice President Engineering.

ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

6.5.1.4 The PSRC shall meet at least once per calendar month and as convened by the PSRC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PSRC necessary for the performance of the PSRC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The PSRC shall be responsible for:

- a. Review of: (1) Administrative Control Procedures and changes thereto, and (2) procedures and changes thereto required by Specification 6.8.1 and requiring a 10 CFR 50.59 safety evaluation.
- b. Review of all proposed changes, tests and experiments which may involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- c. Review of all proposed changes to Technical Specifications or the Operating License;
- d. Review of all safety evaluations performed under the provision of Section 50.59(a)(1), 10 CFR, for changes, tests and experiments;
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President-Plant Operations, and to the Nuclear Safety Review Committee (NSRC); Plant Manager
- f. Review of all REPORTABLE EVENTS;
- g. Review of reports of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman, NSRC;
- i. Not used.
- j. Not used.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- k. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL and the Radwaste Treatment Systems, and
- l. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President Plant Operations and to the Nuclear Safety Review Committee. Plant Manager
- m. Review of the Fire Protection Program and shall submit recommended changes to the Nuclear Safety Review Committee.

6.5.1.7 The PSRC shall:

- a. Recommend in writing to the Vice President Plant Operations approval or disapproval of items considered under Specification 6.5.1.6a. through d. and m. above, Plant Manager
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through e. above constitutes an unreviewed safety question, and Chief Operating Officer
- c. Provide written notification within 24 hours to the President and Chief Executive Officer and the Nuclear Safety Review Committee of disagreement between the PSRC and the Vice President Plant Operations, however, the Vice President Plant Operations shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above. Plant Manager

RECORDS

6.5.1.8 The PSRC shall maintain written minutes of each PSRC meeting that, at a minimum, document the results of all PSRC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President Plant Operations and the Nuclear Safety Review Committee. Plant Manager

6.5.2 NUCLEAR SAFETY REVIEW COMMITTEE (NSRC)

FUNCTION

6.5.2.1 The NSRC shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- e. Process Control Program implementation;
- f. ODCM implementation; and
- g. Quality Assurance Program implementation for effluent and environmental monitoring.
- h. Fire Protection Program implementation.

6.8.2 Each procedure of Specification 6.8.1 and changes thereto, and any other procedure or procedure change that the Vice President Plant Operations determines to affect nuclear safety, shall be reviewed and approved as ^{Plant Manager}

- a. Each procedure, or change thereto shall be reviewed by a Qualified Reviewer who is knowledgeable in the functional area affected, but is not the individual who prepared the procedure or procedure change. All required cross-disciplinary reviews of new procedures, procedure revisions or changes thereto shall be completed prior to approval.
- b. Procedures other than Administrative Control Procedures shall be approved by the responsible Manager or his designee as specified in Administrative Control Procedures. The Vice President Plant Operations shall approve Administrative Control Procedures. The ^{Plant Manager} Manager responsible for the Security Plan shall approve the Security Plan and implementing procedures. The Manager responsible for Emergency Planning shall approve the Radiological Emergency Response Plan and implementing procedures.
- c. The responsible Manager or his designee shall ensure each review includes a determination of whether a procedure, or change thereto, requires a 10 CFR 50.59 safety evaluation. If a procedure, or change thereto, requires a 10 CFR 50.59 safety evaluation, the responsible Manager or his designee shall forward the procedure, or change thereto with the associated 10 CFR 50.59 safety evaluation to the PSRC for review in accordance with Specification 6.5.1.6.a. Pursuant to Section 50.59, 10 CFR, NRC approval of items involving unreviewed safety questions shall be obtained prior to approval for implementation.
- d. Qualified Reviewers shall meet the applicable qualifications of ANSI/ANS 3.1-1978. Personnel recommended to be Qualified Reviewers shall be reviewed by the PSRC and approved and documented by the PSRC Chairman. The responsible Manager shall ensure that a sufficient complement of Qualified Reviewers for their functional area is maintained in accordance with Administrative Control Procedures.
- e. Records documenting the activities performed under Specification 6.8.2.a. through 6.8.2.d, shall be maintained in accordance with Specification 6.10.

ADMINISTRATIVE CONTROLS

HIGH RADIATION AREA (Continued)

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the PSRC and the approval of the Vice President Plant Operations.

Plant Manager

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the PSRC and the approval of the Vice President Plant Operations.

Plant Manager