

PROPOSED ANO-1 TECHNICAL SPECIFICATIONS CHANGES

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- 6.2.2.1 Administrative controls shall be established to limit the amount of overtime worked by plant staff performing safety-related functions. These administrative controls shall be in accordance with the guidance provided by the NRC Policy Statement on working hours (Generic Letter 82-12).

6.3. FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for (1) the designated radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a 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.

6.4 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 Emergency Planning and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Manager, Training and Emergency Planning and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975 except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

- 6.5.1 Plant Safety Committee (PSC) Function
- 6.5.1.1 The Plant Safety Committee shall function to advise the General Manager, Plant Operations and Plant Manager, AFO-1 on all matters related to nuclear safety.

COMPOSITION

- 6.5.1.2 The Plant Safety Committee shall be composed of eight members of ANO onsite management organization who have the technical experience and competence required by ANSI/ANS 3.1-1981 for Managers, Professional-Technical, or Engineering and Technical Support Personnel. The PSC Chairman shall ensure that adequate expertise is present during meetings to evaluate material before the PSC.

In addition, the General Manager, Plant Operations shall designate in writing a PSC Chairman and at least one Alternate Chairman.

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

- 6.5.1.5 The minimum quorum of the PSC necessary for the performance of the PSC 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 Plant Safety Committee shall be responsible for:
- a. Review of 1) all station administrative procedures recommended in Appendix A of Reg Guide 1.33, November, 1972, and changes in intent thereto, 2) changes to the ANO-1 Emergency Operating Procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter 82-33, and 3) any other proposed procedures or revisions thereto as determined by the General Manager, Plant Operations or Plant Manager, ANO-1.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Appendix "A" 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, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Plant Manager, ANO-1, General Manager, Plant Operations and to the Chairman of the Safety Review Committee.
 - f. Review of REPORTABLE EVENTS.
 - g. Review of facility operations to detect potential nuclear safety hazards.

- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager, ANO-1, General Manager, Plant Operations or the Safety Review Committee.
- i. Review of the Plant Security Plan and submittal of recommended changes to the General Manager, Plant Operations and the Safety Review Committee.
- j. Review of the Emergency Plan and submittal of recommended changes to the General Manager, Plant Operations and the Safety Review Committee.
- k. Review of changes to the Offsite Dose Calculation Manual and the Process Control Program.
- l. Review of changes to the Fire Protection Program and submittal of recommended changes to the General Manager, Plant Operations and Safety Review Committee.
- m. Review of proposed procedures and changes to procedures which involve an unreviewed safety question as defined in 10CFR50.59.

AUTHORITY

6.5.1.7. The Plant Safety Committee shall:

- a. Recommend in writing their approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President, Operations ANO and the Safety Review Committee of disagreement between the PSC and the Plant Manager, ANO-1 or the General Manager, Plant Operations; however, the General Manager, Plant Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Safety Committee shall maintain written minutes of each PSC meeting that, at a minimum, document the results of all PSC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Plant Manager, ANO-1, General Manager, Plant Operations and Chairman of the Safety Review Committee.

6.5.2 Safety Review Committee (SRC)

FUNCTION

6.5.2.1 The Safety Review Committee 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

TECHNICAL REVIEW AND CONTROL PROCESS

6.5.3 Procedures required by Specification 6.8.1 and other procedures which affect nuclear safety, as determined by the General Manager, Plant Operations, and changes thereto, shall be reviewed as follows:

- a. Each procedure or change shall be independently reviewed by a qualified individual knowledgeable in the area affected; other than the individual who prepared the procedure or procedure change. This review shall include a determination of whether or not additional cross-disciplinary reviews are necessary. If deemed necessary, the reviews shall be performed by the review personnel of the appropriate discipline(s).
- b. Individuals performing these reviews shall meet the applicable qualifications of ANSI/ANS 3.1-1981, Section 4.0, excluding subsections 4.3.2 and 4.5, and be approved to perform these reviews in a given area by the General Manager, Plant Operations.
- c. Those procedures and programs specified by 6.5.1.6, and changes in intent thereto, shall be reviewed by the PSC and approved by the General Manager, Plant Operations, or ANO-1 Plant Manager prior to implementation.
- d. Those procedures and programs specified by 6.5.1.1, and changes in intent thereto, with the exception of those specified in 6.5.1.6, shall be approved by the appropriate Department Head as specified in station administrative procedures.
- e. Review of the procedure or procedure change will include a determination of whether or not an unreviewed safety question is involved. This determination will be based on the review of a written safety evaluation prepared by a qualified individual, or documentation that a safety evaluation is not required. PSC review, SRC review, and NRC approval of items involving unreviewed safety questions shall be obtained prior to station approval for implementation.
- f. Written records of reviews performed in accordance with this specification shall be prepared and maintained in accordance with Specification 6.9.

- 6.8.2 Each procedure of 6.8.1 above, and changes in intent thereto, shall be reviewed and approved as required by 6.5 prior to implementation and reviewed periodically as set forth in administrative procedures.
- 6.8.3 Changes to procedures of 6.8.1 above may be made and implemented prior to obtaining the review and approval required in 6.8.2 above provided:
- a. The intent of the original procedure is not altered.
 - b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license on Unit 1.
 - c. The change is documented, reviewed and approved as required by 6.5, within 14 days of implementation.

PROPOSED ANO-2 TECHNICAL SPECIFICATIONS CHANGES

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the designated radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and (2) the Shift Technical Advisor who shall have a bachelors 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.

6.4 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 Emergency Planning and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 DELETED

6.5 REVIEW AND AUDIT

6.5.1 PLANT SAFETY COMMITTEE (PSC)

FUNCTION

6.5.1.1 The Plant Safety Committee shall function to advise the General Manager, Plant Operations and Plant Manager, ANO-2 on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Safety Committee shall be composed of eight members of ANO onsite management organization (except as discussed under 6.5.1.3) who have the technical experience and competence required by ANSI/ANS 3.1-1981 for Managers, Professional-Technical, or Engineering and Technical Support personnel. The PSC Chairman shall ensure that adequate expertise is present during meetings to evaluate material before the PSC.

In addition, the General Manager, Plant Operations shall designate in writing a PSC Chairman and at least one Alternate Chairman.

6.5.1.3 If Core Protection Calculator (CPC) Software is being reviewed a nuclear software expert shall be present as a voting member. If one of the members of the Plant Safety Committee meets the qualification requirements for this position, the requirement to have this member is satisfied. This membership may be filled by two appropriately qualified individuals who shall ballot with a single combined vote. Generic qualifications for this membership shall be as follows:

ADMINISTRATIVE CONTROLS

One Individual

The Nuclear Software Expert shall have as a minimum a Bachelor's degree in Science or Eng'neering, Nuclear preferred (in accordance with ANSI N18.1). In addition, he shall have a minimum of four years of technical experience, of which a minimum of two years shall be in Nuclear Engineering and a minimum shall be in Software Engineering. (Software Engineering is that branch of science and technology which deals with the design and use of software. Software Engineering is a discipline directed to the production and modification of computer programs that are correct, efficient, flexible, maintainable, and unders. dable, in reasonable time spans, and at reasonable costs.) The two years of technical experience in Software Engineering may be general software experience not necessarily related to the software of the Core Protection Calculator System. One of these two years of experience shall be with certified computer programs.

Two Individuals

One of the individuals shall meet the requirements of the Nuclear Engineering portion of the above. The second individual shall have a Bachelor of Science degree (digital computer speciality) and meet the Software Engineering requirements of the above.

The membership (the Nuclear Software Expert or the Digital Computer Specialist) shall be knowledgeable of the Core Protection Calculator System with regard to:

- a. The software modules, their interactions with each other and with the data base.
- b. The relationship between operator's module inputs and the trip variables.
- c. The relationship between sensor input signals and the trip variable.
- d. The design basis of the Core Protection Calculator System.
- e. The approved software change procedure and documentation requirements of a software change.
- f. The security of the computer memory and access procedures to the memory.

ADMINISTRATIVE CONTROLS

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.6 The minimum quorum of the PSC necessary for the performance of the PSC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.7 The Plant Safety Committee shall be responsible for:

- a. Review of 1) all station administrative procedures recommended in Appendix A of Reg Guide 1.33, Revision 2, February, 1978, and changes in intent thereto, 2) changes to the ANO-2 Emergency Operating Procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter 82-33, 3) changes to Core Protection Calculator (CPC) Software, and 4) any other proposed procedures or changes thereto as determined by the General Manager, Plant Operations or Plant Manager, ANO-2.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendation to prevent recurrence to the Plant Manager, ANO-2, General Manager, Plant Operations and to the Chairman of the Safety Review Committee.

ADMINISTRATIVE CONTROLS

- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses, and reports thereon as requested by the Plant Manager, ANO-2, General Manager, Plant Operations or the Safety Review Committee.
- i. Review of the Plant Security Plan and submittal of recommended changes to the General Manager, Plant Operations and the Safety Review Committee.
- j. Review of the Emergency Plan and submittal of recommended changes to the General Manager, Plant Operations and Safety Review Committee.
- k. Review of changes to the Offsite Dose Calculation Manual and Process Control Program.
- l. Review of changes to the Fire Protection Program and submittal of recommended changes to the General Manager, Plant Operations and Safety Review Committee.
- m. Review of proposed procedures and changes to procedures which involve an unreviewed safety question as defined in 10CFR50.59.

AUTHORITY

6.5.1.8 The Plant Safety Committee shall:

- a. Recommend in writing their approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President, Operations ANO and the Safety Review Committee of disagreement between the PSC and the Plant Manager, ANO-2 or the General Manager, Plant Operations; however, the General Manager, Plant Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.9 The Plant Safety Committee shall maintain written minutes of each PSC meeting and, at a minimum, document the results of all PSC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Plant Manager, ANO-2, General Manager, Plant Operations and Chairman of the Safety Review Committee.

ADMINISTRATIVE CONTROLS

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The Safety Review Committee 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
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The Safety Review Committee shall be composed of a Chairman and eight to twelve members which collectively have the experience and competence required by ANSI/ANS-3.1-1981 to review problems in the areas specified in Section 6.5.2.1, a-h.

The Vice President, Operations AND shall designate, in writing, the Chairman and all SRC members.

The Chairman shall designate, in writing, the alternate Chairman in the absence of the SEC Chairman.

ADMINISTRATIVE CONTROLS

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the SRC. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire unit staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structure, systems, or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of 10 CFR 50, Appendix "B", at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of unit operation considered appropriate by the SRC or the Vice President, Operations ANO.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. The Offsite Dose Calculation Manual and Process Control Program and implementing procedures at least once per 24 months.
- k. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Vice President, Operations ANO on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

ADMINISTRATIVE CONTROLS

RECORDS

6.5.2.10 Records of SRC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Vice President, Operations ANO within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Vice President, Operations ANO within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President, Operations ANO and to the management positions responsible for the areas audited within 30 days after completion of the audit.

TECHNICAL REVIEW AND CONTROL PROCESS

6.5.3 Procedures required by Specification 6.8.1 and other procedures which affect nuclear safety, as determined by the General Manager, Plant Operations, and changes thereto, shall be reviewed as follows:

- a. Each procedure or change shall be independently reviewed by a qualified individual knowledgeable in the area affected other than the individual who prepared the procedure or procedure change. This review shall include a determination of whether or not additional cross-disciplinary reviews are necessary. If deemed necessary, the reviews shall be performed by the review personnel of the appropriate discipline(s).
- b. Individuals performing these reviews shall meet the applicable qualifications of ANSI/ANS 3.1-1981, Section 4.0, excluding subsections 4.3.2 and 4.5, and be approved to perform these reviews in a given area by the General Manager, Plant Operations.
- c. Those procedures and programs specified by 6.5.1.7, and changes in intent thereto, shall be reviewed by the PSC and approved by the General Manager, Plant Operations, or ANO-2 Plant Manager prior to implementation.
- d. Those procedures and programs specified by 6.8.1, and changes in intent thereto, with the exception of those specified in 6.5.1.7, shall be approved by the appropriate Department Head as specified in station administrative procedures.

- e. Review of the procedure or procedure change will include a determination of whether or not an unreviewed safety question is involved. This determination will be based on the review of a written safety evaluation prepared by a qualified individual, or documentation that a safety evaluation is not required. PSC review, SRC review, and NRC approval of items involving unreviewed safety questions shall be obtained prior to station approval for implementation.
- f. Written records of reviews performed in accordance with this specification shall be prepared and maintained in accordance with Specification 6.10.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. A report shall be submitted to the Commission pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PSC and, the results of this review shall be submitted to the SRC and the Vice President, Operations AND.

ADMINISTRATIVE CONTROLS

6.7 SAFETY LIMIT VIOLATION

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

- a. The unit shall be placed in at least HOT STANDBY within one hour.
- b. The Vice President, Operations ANO and the SRC shall be notified within 24 hours.
- c. The Nuclear Regulatory Commission shall be notified pursuant to 10CFR50.72 and a report submitted pursuant to the requirements of 10CFR50.36 and Specification 6.6.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. Modification of Core Protection Calculator (CPC) Addressable Constants. These procedures should include provisions to assure that sufficient margin is maintained in CPC Type I addressable constants to avoid excessive operator interaction with the CPCs during reactor operation.

NOTE: Modifications to the CPC software (including changes of algorithms and fuel cycle specific data) shall be performed in accordance with the most recent version of "CPC Protection Algorithm Software Change Procedure," CEN-39(A)-P that has been determined to be applicable to the facility. Additions or deletions to CPC addressable constants or changes to addressable constant software limit values shall not be implemented without prior NRC approval.

- h. New and spent fuel storage.
- i. ODCM and PCP implementation.
- j. Postaccident sampling (includes sampling of reactor coolant, radioactive iodines and particulates in plant gaseous effluent, and the containment atmosphere).

6.8.2 Each procedure of 6.8.1 above, the changes in intent thereto, shall be reviewed and approved as required by 6.5 prior to implementation and reviewed periodically as set forth in administrative procedures.

ADMINISTRATIVE CONTROL

6.8.3 Changes to procedures of 6.8.1 above may be made and implemented prior to obtaining the review and approval required in 6.8.2 above provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on Unit 2.
- c. The change is documented, reviewed and approved as required by 6.5, within 14 days of implementation.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Administrator of the Regional Office unless otherwise noted.

STARTUP REPORT

6.9.1.1 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.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall 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.

6.9.1.3 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.