

ATTACHMENT IV

PROPOSED TECHNICAL SPECIFICATION CHANGES

ADMINISTRATIVE CONTROLS6.1 RESPONSIBILITY

6.1.1 The ~~Director~~ ^{Vice President} Plant Operations 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 ORGANIZATION6.2.1 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 ~~Director~~ ^{Vice President} Plant Operations 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;

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6.3 UNIT STAFF QUALIFICATION (Continued)

- b. The position of Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- c. The NSRC members shall meet or exceed the requirements of ANSI/ANS 3.1-1981.

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)

FUNCTION

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

COMPOSITION

6.5.1.2 The PSRC shall be composed of the:

Member:	Manager System Engineering
Member:	Manager Operations
Member:	Manager Technical Support
Member:	Manager Maintenance and Modifications
Member:	Manager Instrumentation and Control
Member:	Supervisor Reactor Engineering
Member:	Manager Radiation Protection
Member:	Manager Chemistry
Member:	Supervisor Results Engineering
Chairman:	Manager Plant Support

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.

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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 designater/ 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) all procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Director Plant Operations to affect nuclear safety;
(Vice President)
- 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 Operations, and to the Nuclear Safety Review Committee (NSRC);
(Plant)
- 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. Review of the plant Security Plan and implementing procedures and shall submit recommended changes to the NSRC;
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the NSRC;

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

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.

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,

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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.

Major Procedures, supported by appropriate Minor Procedures (such as checkoff lists, operating instructions, data sheets, alarm responses, etc.), shall be provided for the above activities.* A Major Procedure is a procedure which controls safety-related activities, and establishes one or more basic controls, overall responsibilities, authority assignments or administrative and operational ground rules at the Wolf Creek plant. Major Procedures are written to meet the requirements of ANSI N18.7-1976/ANS 3.2 and generally are supported by Minor Procedures which provide delineation of details such as for valve lineups, calibration procedures, operating instructions, data sheets, alarm responses, and other procedures identified as "supporting." Major Procedures require signature approval in all cases by the Director, Plant Operations or a Call Vice President Superintendent in his absence. A Minor Procedure is a procedure which controls safety-related activities in support of a Major Procedure. It addresses a specific topic or sub-topic established by its 'parent' Major Procedure, expanding on it by providing working level instructions. Minor Procedures are not permitted to contradict requirements contained in their governing Major Procedure. Minor Procedures require signature approval by the Director, Plant Operations, or a Call Superintendent in his absence, only at Revision '0.' Vice President

6.8.2 Approval of Procedures

- a. All Major Procedures of the categories listed in Specification 6.8.1 and modifications to the intent thereof shall be reviewed by the PSRC and approved by the Director, Plant Operations prior to implementation and reviewed periodically as set forth in Administrative Procedures. Vice President
- b. Minor Procedures (checkoff lists, operating instructions, data sheets, alarm responses, chemistry and analytical procedures, technical instructions, special and routine maintenance procedures, laboratory manuals, etc.) shall, prior to initial use, be approved by the PSRC or a Subcommittee thereof.
- c. Corporate Emergency Plan implementing procedures shall be reviewed by appropriate corporate and plant personnel and approved by the President and Chief Executive Officer as set forth in General Procedures.

*With the exception of Corporate Emergency Plan implementing procedures. Corporate Emergency Plan implementing procedures shall be provided but shall not be designated as major or minor procedures.

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PROCEDURES AND PROGRAMS (Continued)

6.8.3 Changes to Procedures

- a. Temporary changes to Major Procedures, of the categories listed in Specification 6.8.1 which do not change the intent or generate an unreviewed safety question of the original or subsequent approved procedure, may be made provided such changes to operating procedures are approved by the Shift Supervisor (SRO licensed) and one of the Call Superintendents. For temporary changes to Major Procedures under the jurisdiction of groups other than Operations (e.g., Maintenance, Instrumentation and Control, Reactor Engineering, Chemistry, Health Physics) which do not change the intent or generate an unreviewed safety question, changes may be made upon approval of the Cognizant Group Leader and a Call Superintendent.

All temporary changes to Major Procedures (made by a Call Superintendent and either a Cognizant Group Leader or the Shift Supervisor) shall subsequently be reviewed by the PSRC and approved by the ~~Director~~ Vice President Plant Operations within 14 days, except that Temporary changes to Major Procedures made during a refueling outage may be reviewed and approved at any time prior to initial criticality of the reload core. All permanent changes to Major Procedures shall be made in accordance with Specification 6.8.2.a.

- b. All temporary or permanent changes to Minor Operating Procedures (checkoff lists, alarm responses, data sheets, operating instructions, etc.) shall be approved by the Shift Supervisor, and shall be subsequently reviewed and approved by the Operations PSRC Subcommittee. All temporary or permanent changes to other Minor Procedures under the jurisdiction of groups other than Operations (e.g., Maintenance, Instrumentation and Control, Reactor Engineering, Chemistry, Health Physics) shall be approved by a Cognizant Group Leader and shall be subsequently reviewed and approved by the appropriate PSRC Subcommittee.
- c. Temporary changes to Corporate Emergency Plan implementing procedures may be made provided that: (1) the intent of the original procedure is not altered, (2) the change is approved by the Manager Technical Services, and (3) the change is documented, reviewed by appropriate Corporate and plant personnel and approved by the President and Chief Executive Officer within 14 days of the implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

- a. Reactor Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the appropriate portions of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, RHR System, and the Nuclear Sampling System (PASS only). The program shall include the following:

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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 ~~Director~~ Plant Operations.

Vice President

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 ~~Director~~ Plant Operations.

Vice President