

Attachment

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ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager - Nuclear Plant shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor or during his absence from the Control Room a designated individual shall be responsible for the Control Room command function. A management directive to this effect, signed by the Senior Vice President responsible for Nuclear Generation, hereafter referred to as Senior Vice President, shall be reissued on an annual basis.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

FACILITY STAFF

6.2.2 The facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the Control Room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room while the unit is in MODE 1, 2, 3 or 4.
- c. A Health Physics Technician # shall be on site when fuel is in the reactor.
- d. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times.# The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

#The Health Physics Technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accomodate unexpected absence of the Health Physics Technician and/or Fire Brigade members provided immediate action is taken to restore the Health Physics Technician and/or Fire Brigade to within the minimum requirements.

ADMINISTRATIVE CONTROLS

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., Senior Reactor Operators, Reactor Operators, Health Physics Technicians, Auxiliary Operators, and key maintenance personnel. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the plant is operating.

In the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

1. An individual will not be permitted to work more than 16 hours straight (not including shift turnover time).
2. There will be a break of at least 8 hours (which can include shift turnover time) between work periods.
3. An individual will not work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period (all excluding shift turnover time).
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.
5. Any deviation from the above guidelines for the minimum shift complement defined in Technical Specification Table 6.2-1 and health physics technicians shall be reviewed and approved by the General Manager - Nuclear Plant, his designee (Emergency Director) or higher authority. Any deviation from the above guidelines for key maintenance personnel shall be reviewed and approved by the Maintenance Manager or his designee (group supervisor).

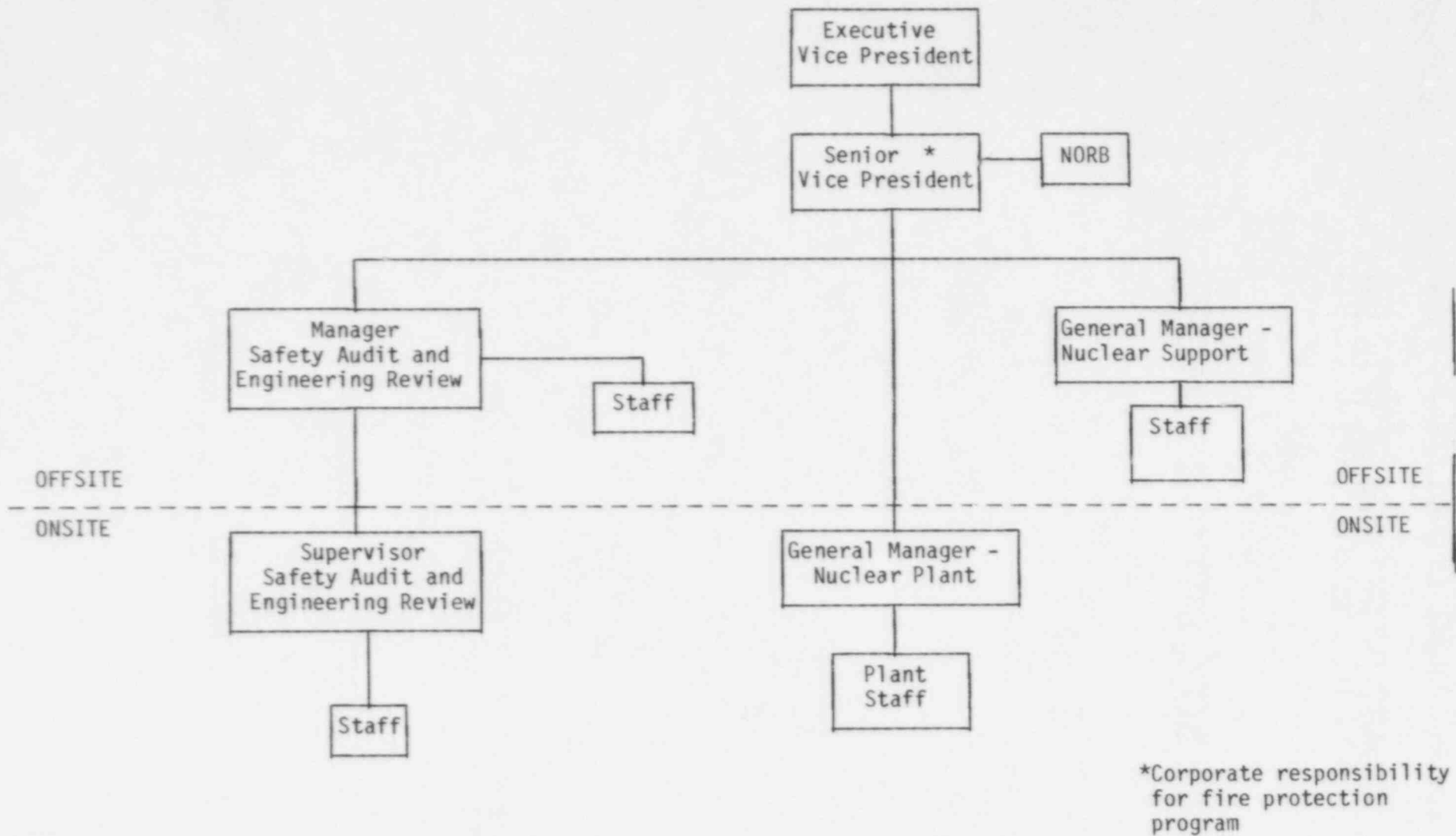


Figure 6.2-1 Offsite Organization for Facility Management and Technical Support

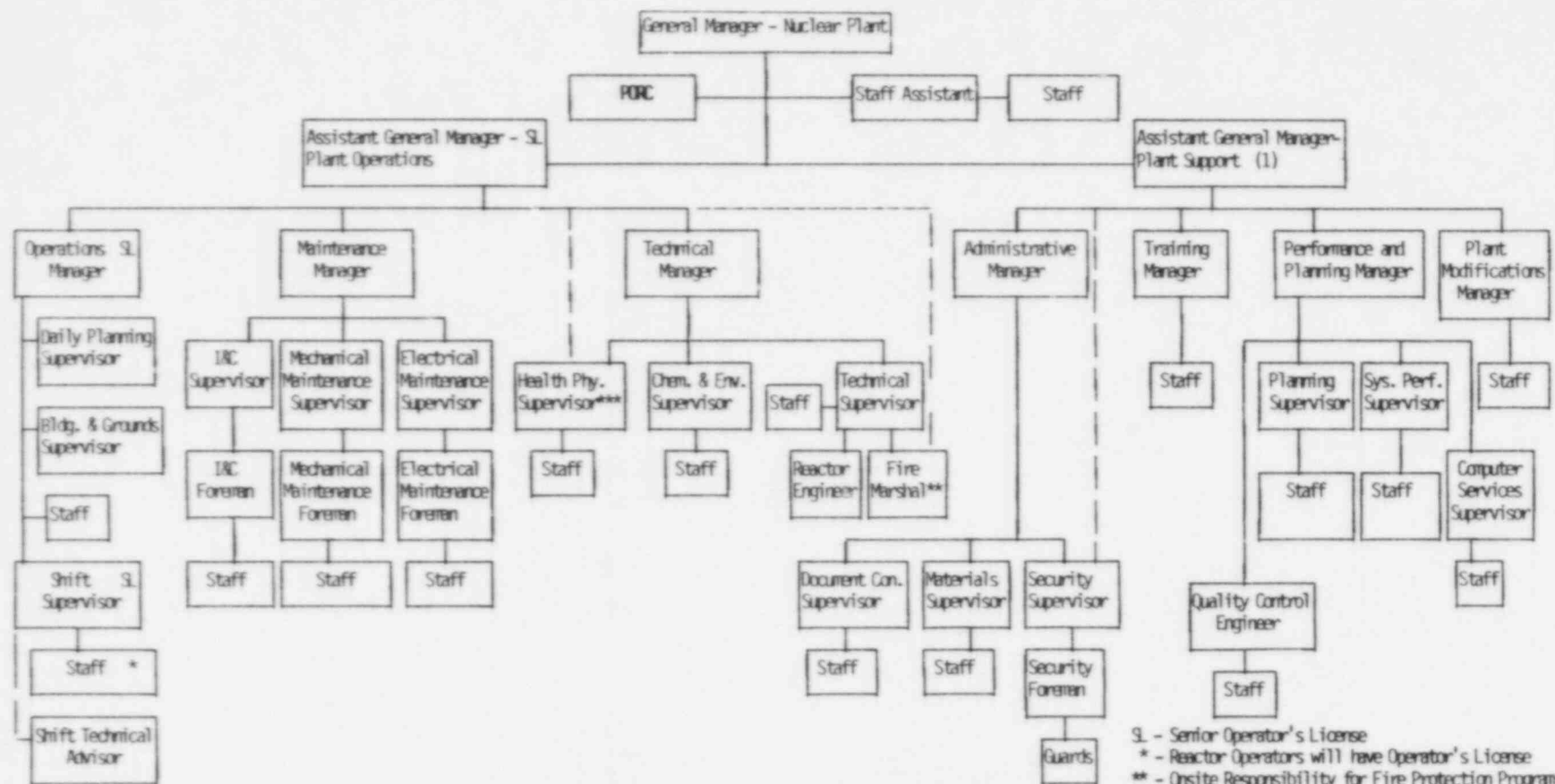


Figure 6.2-2 Facility Organization

*** In routine matters, the Health Physics Supervisor reports directly to the Technical Manager. In matters of radiation policy determination, interpretation or implementation (based upon the Health Physics Supervisor's judgment), the Health Physics Supervisor may report directly to the Assistant General Manager - Plant Operations.

(1) The person filling this position may act as the General Manager - Nuclear Plant, provided this person meets the requirements of ANSI N18.1-1971 Section 4.2.1, FSAR Section 13.1.3.1.1 and has completed Emergency Director Training.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager 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 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with the relevant operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the General Manager - Nuclear Plant on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PORC shall be composed of the:

Chairman:	General Manager - Nuclear Plant
Vice Chairman:	Assistant General Manager - Plant Operations
Member:	Assistant General Manager - Plant Support
Member:	Operations Manager
Member:	Technical Manager
Member:	Maintenance Manager
Member (non-voting):	Supervisor - Safety Audit and Engineering Review
Member:	Performance and Planning Manager
Member:	Plant Modifications Manager

ALTERNATES

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

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or Vice Chairman.

QUORUM

6.5.1.5 The minimum quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or Vice Chairman and three members including alternates.

RESPONSIBILITIES

6.5.1.6 The PORC shall review:

ADMINISTRATIVE CONTROLS

- a. All administrative procedures and changes thereto,
- b. The safety evaluations for 1) procedures, 2) changes to procedures, equipment or systems, and 3) tests or experiments completed under the provision of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question and all programs required by Specification 6.8 and changes thereto.
- c. Proposed procedures and changes to procedures, equipment or systems which may involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- d. Proposed tests or experiments which may involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- e. Proposed changes to Technical Specifications or this Operating License.
- f. Reports of violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.
- g. Reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- h. All REPORTABLE EVENTS.
- i. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- j. The plant Security Plan.
- k. The Emergency Plan.
- l. Facility operations to detect potential nuclear safety hazards.
- m. Investigations or analyses of special subjects as requested by the Chairman of the Nuclear Operations Review Board.
- n. Every unexpected onsite release of radioactive material to the environs resulting from a lack of preplanning including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the General Manager - Nuclear Plant and to the Nuclear Operations Review Board.
- o. Changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.1.7 The PORC shall:

- a. Recommend to the General Manager - Nuclear Plant in writing, approval or disapproval of items considered under 6.5.1.6(a) through (e) and (j) and (k) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a), (c) and (d) above constitutes an unreviewed safety question.
- c. Make recommendations to the General Manager - Nuclear Plant in writing that actions reviewed under 6.5.1.6(b) above did not constitute an unreviewed safety question.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President and Chairman of the Nuclear Operations Review Board.

6.5.2 NUCLEAR OPERATIONS REVIEW BOARD (NORB)

FUNCTION

6.5.2.1 The NORB 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 NORB shall be composed of at least four persons including:

Chairman:	Senior Vice President
Vice Chairman:	General Manager - Nuclear Support
Secretary:	Manager-Safety Audit and Engineering Review
Member:	General Manager - Nuclear Plant

and other appointed personnel having an academic degree in an engineering or physical science field and a minimum of five years technical experience, of which a minimum of three years shall be in one or more of the areas given in 6.5.2.1.

ADMINISTRATIVE CONTROLS

ALTERNATES

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

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NORB Chairman to provide expert advice to the NORB.

MEETING FREQUENCY

6.5.2.5 The NORB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 A quorum shall consist of the Chairman or Vice Chairman plus enough voting members to constitute a majority of the NORB. No more than a minority of the quorum shall have line responsibility for operation of the facility. For the purpose of a quorum those considered to have line responsibility will include the General Manager - Nuclear Plant and personnel reporting to the General Manager - Nuclear Plant.

REVIEW

6.5.2.7 The NORB shall review:

- a. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- b. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- c. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance or abnormal degradation of systems designed to contain radioactive material.
- d. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- e. All REPORTABLE EVENTS.
- f. Recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.

ADMINISTRATIVE CONTROLS

1. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- n. At each scheduled NORB meeting, the Manager-Safety Audit and Engineering Review shall make a summary report of the above audits.

AUTHORITY

6.5.2.9 The NORB shall report to and advise the Senior Vice President on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

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

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

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Technical Specification 6.8 and other procedures which affect plant nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Administrative Procedures will be approved by either the Technical Manager, the Operations Manager, the Maintenance Manager, the Performance and Planning Manager, Plant Modifications Manager, the Administrative Manager, or an Assistant General Manager as applicable. The General Manager - Nuclear Plant will approve administrative procedures, security implementing procedures, emergency plan implementing procedures and contingency implementing procedures. Temporary changes to procedures which clearly do not change the intent of the approved procedures will be approved by two

ADMINISTRATIVE CONTROLS

members of the plant staff, at least one of whom holds a Senior Reactor Operator's License. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the General Manager - Nuclear Plant. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the General Manager - Nuclear Plant.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the General Manager - Nuclear Plant.
- d. Occurrences reportable pursuant to the Technical Specification 6.0 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the General Manager - Nuclear Plant and forwarded to the Senior Vice President and to the Chairman of the Nuclear Operations Review Board.
- e. Individuals responsible for reviews performed in accordance with 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, and 6.5.3.1.d shall be members of the plant supervisory staff previously designated by the General Manager - Nuclear Plant. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.
- f. Each review will include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10CFR50.59 NRC approval of items involving unreviewed safety question will be obtained prior to General Manager - Nuclear Plant approval for implementation.

RECORDS

6.5.3.2 Records of the above activities shall be provided to the General Manager - Nuclear Plant, PORC and/or NORB as necessary for required reviews.

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager - Nuclear Plant shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor or during his absence from the Control Room a designated individual shall be responsible for the Control Room command function. A management directive to this effect, signed by the Senior Vice President responsible for Nuclear Generation, hereafter referred to as Senior Vice President, shall be reissued on an annual basis.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

FACILITY STAFF

6.2.2 The facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the Control Room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room while the unit is in MODE 1, 2, 3 or 4.
- c. A Health Physics Technician # shall be on site when fuel is in the reactor.
- d. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times.# The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

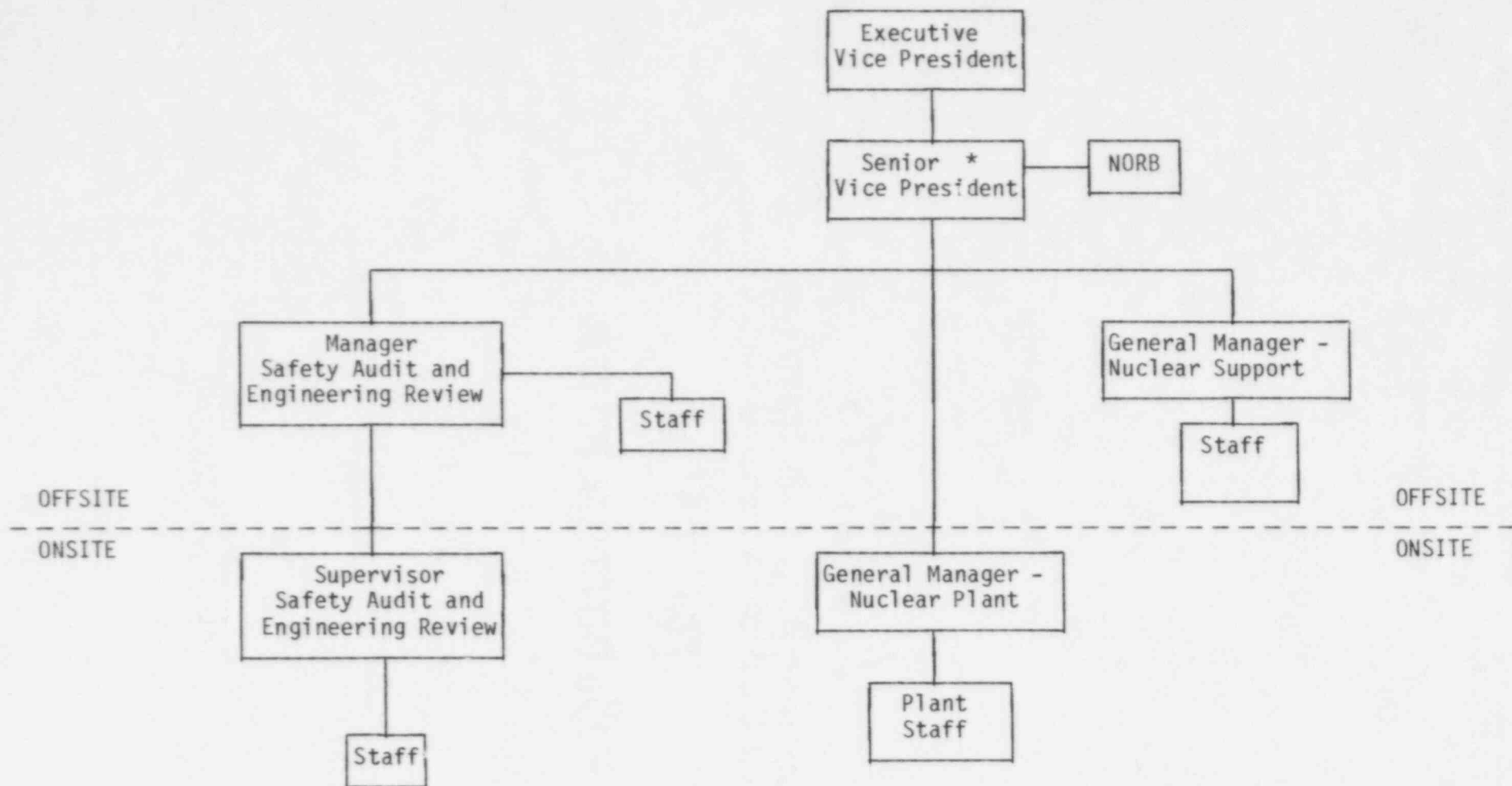
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4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.
5. Any deviation from the above guidelines for the minimum shift complement defined in Technical Specification Table 6.2-1 and health physics technicians shall be reviewed and approved by the General Manager - Nuclear Plant, his designee (Emergency Director) or higher authority. Any deviation from the above guidelines for key maintenance personnel shall be reviewed and approved by the Maintenance Manager or his designee (group supervisor).



*Corporate responsibility for fire protection program

Figure 6.2-1 Offsite Organization for Facility Management and Technical Support

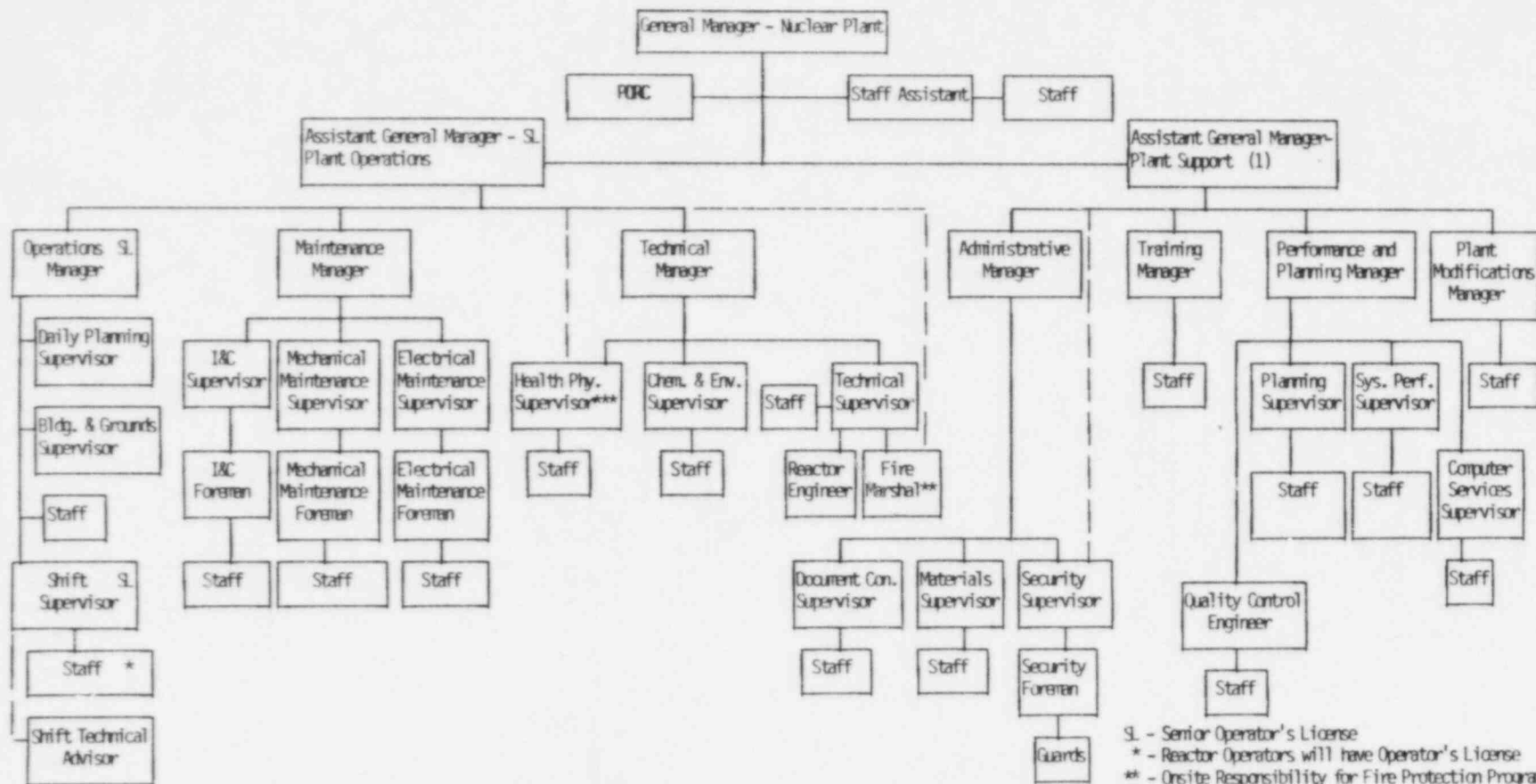


Figure 6.2-2 Facility Organization

*** In routine matters, the Health Physics Supervisor reports directly to the Technical Manager. In matters of radiation policy determination, interpretation or implementation (based upon the Health Physics Supervisor's judgment), the Health Physics Supervisor may report directly to the Assistant General Manager-Nuclear Operations.

(1) The person filling this position may act as the General Manager Nuclear-Plant, provided this person meets the requirements of ANSI N18.1-1971 Section 4.2.1, FSAR Section 13.1.3.1.1 and has completed Emergency Director Training.

ADMINISTRATIVE CONTROLS

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Member (non-voting):	Supervisor - Safety Audit and Engineering Review
Member:	Performance and Planning Manager
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ALTERNATES

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MEETING FREQUENCY

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ADMINISTRATIVE CONTROLS

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- c. Make recommendations to the General Manager - Nuclear Plant in writing that actions reviewed under 6.5.1.6(b) above did not constitute an unreviewed safety question.

RECORDS

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6.5.2 NUCLEAR OPERATIONS REVIEW BOARD (NORB)

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COMPOSITION

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Member:	General Manager - Nuclear Plant

and other appointed personnel having an academic degree in an engineering or physical science field and a minimum of five years technical experience, of which a minimum of three years shall be in one or more of the areas given in 6.5.2.1.

ADMINISTRATIVE CONTROLS

ALTERNATES

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MEETING FREQUENCY

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REVIEW

6.5.2.7 The NORB shall review:

- a. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- b. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- c. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance or abnormal degradation of systems designed to contain radioactive material.
- d. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- e. All REPORTABLE EVENTS.
- f. Recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.

ADMINISTRATIVE CONTROLS

- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- n. At each scheduled NORB meeting, the Manager-Safety Audit and Engineering Review shall make a summary report of the above audits.

AUTHORITY

6.5.2.9 The NORB shall report to and advise the Senior Vice President on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

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

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

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Technical Specification 6.8 and other procedures which affect plant nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Administrative Procedures will be approved by either the Technical Manager, the Operations Manager, the Maintenance Manager, the Performance and Planning Manager, Plant Modifications Manager, the Administrative Manager, or an Assistant General Manager as applicable. The General Manager - Nuclear Plant will approve administrative procedures, security implementing procedures, emergency plan implementing procedures and contingency implementing procedures. Temporary changes to procedures which clearly do not change the intent of the approved procedures will be approved by two

ADMINISTRATIVE CONTROLS

members of the plant staff, at least one of whom holds a Senior Reactor Operator's License. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change.

- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the General Manager - Nuclear Plant. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the General Manager - Nuclear Plant.
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the General Manager - Nuclear Plant.
- d. Occurrences reportable pursuant to the Technical Specification 6.0 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the General Manager - Nuclear Plant and forwarded to the Senior Vice President and to the Chairman of the Nuclear Operations Review Board.
- e. Individuals responsible for reviews performed in accordance with 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, and 6.5.3.1.d shall be members of the plant supervisory staff previously designated by the General Manager - Nuclear Plant. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.
- f. Each review will include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10CFR50.59 NRC approval of items involving unreviewed safety question will be obtained prior to General Manager - Nuclear Plant approval for implementation.

RECORDS

6.5.3.2 Records of the above activities shall be provided to the General Manager - Nuclear Plant, PORC and/or NORB as necessary for required reviews.