

**ATTACHMENT 3**

**MARK-UPS OF PROPOSED CHANGES  
TO  
TECHNICAL SPECIFICATION 6.2.3**

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## ADMINISTRATIVE CONTROLS

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## ADMINISTRATIVE CONTROLS

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### 6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG) (Not Used)

#### FUNCTION

~~6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall made detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Manager, Nuclear Safety Review Board.~~

#### COMPOSITION

~~6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.~~

#### RESPONSIBILITIES

~~6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.~~

#### RECORDS

~~6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Manager, Nuclear Safety Review Board.~~

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

### 6.3 (Not Used)

\*Not responsible for sign-off function.

**ATTACHMENT 4**

**MARK-UPS OF PROPOSED CHANGES  
TO  
UFSAR 13.4.2.2**

### 13.4 REVIEW AND AUDIT

The audit program is described in Updated Final Safety Analysis Report (UFSAR) Section 17.2.18. This program provides for Nuclear Safety Review Board (NSRB) involvement as required by Technical Specifications.

#### 13.4.1 Onsite Review

Onsite review activities are performed by the Plant Operations Review Committee (PORC), which is described in Section 6.0 of the Technical Specifications.

#### 13.4.2 Independent Review

13.4.2.1 Nuclear Safety Review Board. The Executive Vice President & General Manager, Nuclear, shall appoint a chairman for the NSRB and at least four other members with one designated as Vice-Chairman. The Executive Vice President & General Manager, Nuclear, shall also appoint all alternate members. The members shall be selected so they collectively have the capability to review technical matters related to the following areas:

- Nuclear Station Operations
- Nuclear Engineering
- Chemistry and Radiochemistry
- Radiological Safety
- Mechanical Engineering
- Electrical Engineering
- Instrumentation and Control
- Civil Engineering
- Training
- Nuclear Assurance
- Nuclear Licensing
- Nuclear Security
- Environmental Impact
- Metallurgy

The members of the NSRB shall be qualified in accordance with American Nuclear Standard (ANS) 3.1-1981 and Regulatory Guide (RG) 1.8.

The NSRB shall undertake independent reviews and audits of potentially significant activities which relate to nuclear safety and advise the Executive Vice President & General Manager, Nuclear, of the results of their activities. These reviews shall include station operations, modification of station design, procurement of safety-related equipment and/or services and unusual or unanticipated events. The NSRB was in place prior to fuel load in South Texas Project Electric Generating Station (STPEGS) Unit 1.

Specific details of the NSRB are described in the STPEGS Technical Specifications.

13.4.2.2 Independent Safety Engineering Group. Houston Lighting & Power Company (HL&P) formed an Independent Safety Engineering Group (ISEG) prior to fuel load in STPEGS Unit 1. This group has a minimum of five, dedicated, full-time engineers. **Each has a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field. The ISEG function is incorporated within the Quality Department and** ~~This group~~ reports directly to the Director, Quality.

The principal function of the ISEG **personnel** is to examine plant operating characteristics, NRC issuances, **Licensee Event Reports** and other sources of experience information that may indicate areas for improving plant safety. The ISEG ~~independently reviews reports of plant activities and performs independent reviews of such activities. Where useful improvements can be made, the group presents detailed recommendations to NSRB.~~ **personnel shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Chairman, Nuclear Safety Review Board. The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification (no sign-off function) that these activities are performed correctly and that human errors are reduced as much as practical. Records of activities performed by the ISEG personnel shall be prepared, maintained, and forwarded each calendar month to the Chairman, Nuclear Safety Review Board. The ISEG personnel do does not have a role in day-to-day operation and management of STPEGS. Specific details of ISEG's role are in the Technical Specifications.**

#### 13.4.3 Audit Program

The NSRB is cognizant of audits of activities described in the Operations Quality Assurance Program (OQAP). The procedures and organization employed to implement the audit program are discussed in Chapter 15.0 of the OQAP. The HL&P Quality staff conducts independent overview activities as defined in the OQAP. Audits of safety-related activities are planned in accordance with a written plan and performed with a frequency commensurate with their safety significance, past performance, and regulatory requirements. Qualification of auditors, conduct of the audit, reporting of the audit, and follow-up of audit deficiency corrections are controlled by a written procedure. Copies of audit reports are distributed to the NSRB.