

ATTACHMENT A

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>	<u>Comments</u>
I thru XVIIa	I thru XXVI	Revised Index
3/4 1-26	-	Deleted
3/4 4-29	-	Deleted
3/4 4-30	-	Deleted
3/4 4-31	3/4 4-29	Renumbered
3/4 5-8	-	Deleted
3/4 7-23	3/4 7-23	added (next pg. is 3/4 7-26)
3/4 7-24	-	Deleted
3/4 7-25	-	Deleted
3/4 11-16	3/4 11-16	added (next pg. is 3/4 11-18)
3/4 11-17	-	Deleted
3/4 11-18	3/4 11-18	added (next pg. is 3/4 11-20)
3/4 11-19	-	Deleted
6-15	6-15	added info. from pages 6-16/ 6-17, 6-18, 6-19 and added (next page is 6-20)
6-16/6-17	-	Deleted
6-18	-	Deleted
6-19	-	Deleted
6-1	6-1	Reorganization
6-1a	6-1a	Reorganization
6-2	6-2	Reorganization
6-3	6-3	Reorganization
6-4	6-4	Reorganization

<u>Remove Pages</u>	<u>Insert Pages</u>	<u>Comments</u>
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6-6	6-6	Reorganization
6-7	6-7	Reorganization
6-8	6-8	Reorganization
6-9	6-9	Reorganization
6-11	6-11	Reorganization
6-12	6-12	Reorganization
6-13	6-13	Reorganization
6-31	6-31	Reorganization
6-30	6-30	Correct a typographical error Section 6.13.3 to 6.16.3
B3/4 11-2	B3/4 11-2	Correct a typographical error

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REACTOR COOLANT SYSTEM

3/4.4.11 RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.1.1 (Two) power operated relief valves (PORVs) and their associated block valves shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3

ACTION:

- a. With less than 2 PORV(s) operable, within 1 hour either restore two PORV(s) to OPERABLE status or close the associated block valve(s) and remove power from the block valve(s); otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one or more block valve(s) inoperable, within 1 hour either restore the block valve(s) to OPERABLE status or close the block valve(s) and remove power from the block valve(s); otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.4.11.1 Each PORV shall be demonstrated OPERABLE:

- a. At least once per 31 days by performance of a CHANNEL CHECK of the position indication, excluding valve operation and
- b. By performance of a CHANNEL CALIBRATION in accordance with Table 4.3-7 on the operable PORV(s) Control Channel(s).

4.4.11.2 Each block valve shall be demonstrated OPERABLE at least once per 92 days by operating the valve through one complete cycle of full travel.

4.4.11.3 The emergency power supply for the PORVs and block valves shall be demonstrated OPERABLE at least once per 18 months by operating the valves through a complete cycle of full travel.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- a. Source in use (excluding startup sources previously subjected to core flux) - At least once per six months for all sealed sources containing radioactive materials.
 - 1. With a half-life greater than 10 days (excluding Hydrogen 3) and
 - 2. In any form other than gas.
- b. Stored sources not in use - Each sealed source shall be tested prior to use or transfer to another licensee unless tested within the previous six months. Sealed sources transferred without a certificate indicating the last test date shall be tested prior to being placed into use.
- c. Startup sources - Each sealed startup source shall be tested prior to being subjected to core flux and following repair or maintenance to the source.

4.7.9.1.3 Reports - A Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days if source leakage tests reveal the presence of ≥ 0.005 microcuries of removable contamination.

RADIOACTIVE EFFLUENTS

DOSE, RADIOIODINES, RADIOACTIVE MATERIAL IN PARTICULATE FORM AND RADIONUCLIDES OTHER THAN NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to MEMBER(S) OF THE PUBLIC from radioiodines and radioactive materials in particulate form (excluding C-14), and radionuclides (other than noble gases) with half-lives greater than 8 days in gaseous effluents released from the site (see Figure 5.1-1) shall be limited to the following:

- a. During any calendar quarter to \leq 7.5 mrem to any organ, and
- b. During any calendar year to \leq 15 mrem to any organ.

APPLICABILITY: At all times

ACTION:

- a. With the calculated dose from the release of radioiodines, radioactive materials in particulate form, (excluding C-14), and radionuclides (other than noble gases) with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report, which identifies the cause(s) for exceeding the limit and defines the corrective actions taken to reduce the releases and the proposed corrective actions to be taken to assure the subsequent releases will be within the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3 Dose Calculations. Cumulative dose contributions shall be determined in accordance with the ODCM at least once every 31 days.

RADIOACTIVE EFFLUENTS

GASEOUS RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.2.4 The Gaseous Radwaste Treatment System and the Ventilation Exhaust Treatment System shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases from the site (see Figure 5.1-1), when averaged over 31 days, would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation. The appropriate portions of the Ventilation Exhaust Treatment System shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases from the site (see Figure 5.1-1) when averaged over 31 days would exceed 0.3 mrem to any organ.

APPLICABILITY: At all times.

ACTION

- a. With gaseous waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which includes the following information:
 1. Identification of the inoperable equipment or subsystems and the reason for inoperability,
 2. Action(s) taken to restore the inoperable equipment to operational status, and
 3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.4 Doses due to gaseous releases from the site shall be projected at least once per 31 days, in accordance with the ODCM.

ADMINISTRATIVE CONTROLS

MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management Information and Program Control, U. S. Nuclear Regulatory Commission, Washington, DC 20555, with a copy to the Regional Office, submitted no later than the 15th of each month following the calendar month covered by the report.

6.9.1.7 DELETED

6.9.1.8 DELETED

6.9.1.9 DELETED

ANNUAL RADIOLOGICAL ENVIRONMENTAL REPORT³

6.9.1.10 Routine radiological environmental operating reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year and will include reporting any deviations not reported under 6.9.2 with respect to the Radiological Effluent Technical Specifications.

6.9.1.11 The annual radiological environmental reports shall include summaries, interpretations, and statistical evaluation of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of the land use censuses required by Specification 3.12.2. If harmful effects or evidence of irreversible damage are detected by the monitoring, the report shall provide an analysis of the problem and a planned course of action to alleviate the problem.

The annual radiological environmental operating reports shall include summarized and tabulated results in the format of Table 6.9-1 of all radiological environmental samples taken during the report period. In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

³ A single submittal may be made for a multiple unit site. The submittal should combine these sections that are common to both units.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.2 ORGANIZATION

CORPORATE

6.2.1 The corporate 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 Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
- e. ALL CORE ALTERATIONS after the initial fuel loading 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.
- f. A Fire Brigade of at least 5 members shall be maintained on site at all times. The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.
- g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; senior reactor operators, reactor operators, radiation control technicians, auxiliary operators, meter and control repairman, and all personnel actually performing work on safety related equipment.

ADMINISTRATIVE CONTROLS (Continued)

The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, 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:

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual should not be permitted to 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 seven day period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, including shift turnover time.
- d. 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.

Any deviation from the above guidelines shall be authorized by the Plant Manager or predesignated alternate, or higher levels of management. Authorized deviations to the working hour guidelines shall be documented and available for NRC review.

DUQUESNE LIGHT COMPANY
NUCLEAR GROUP

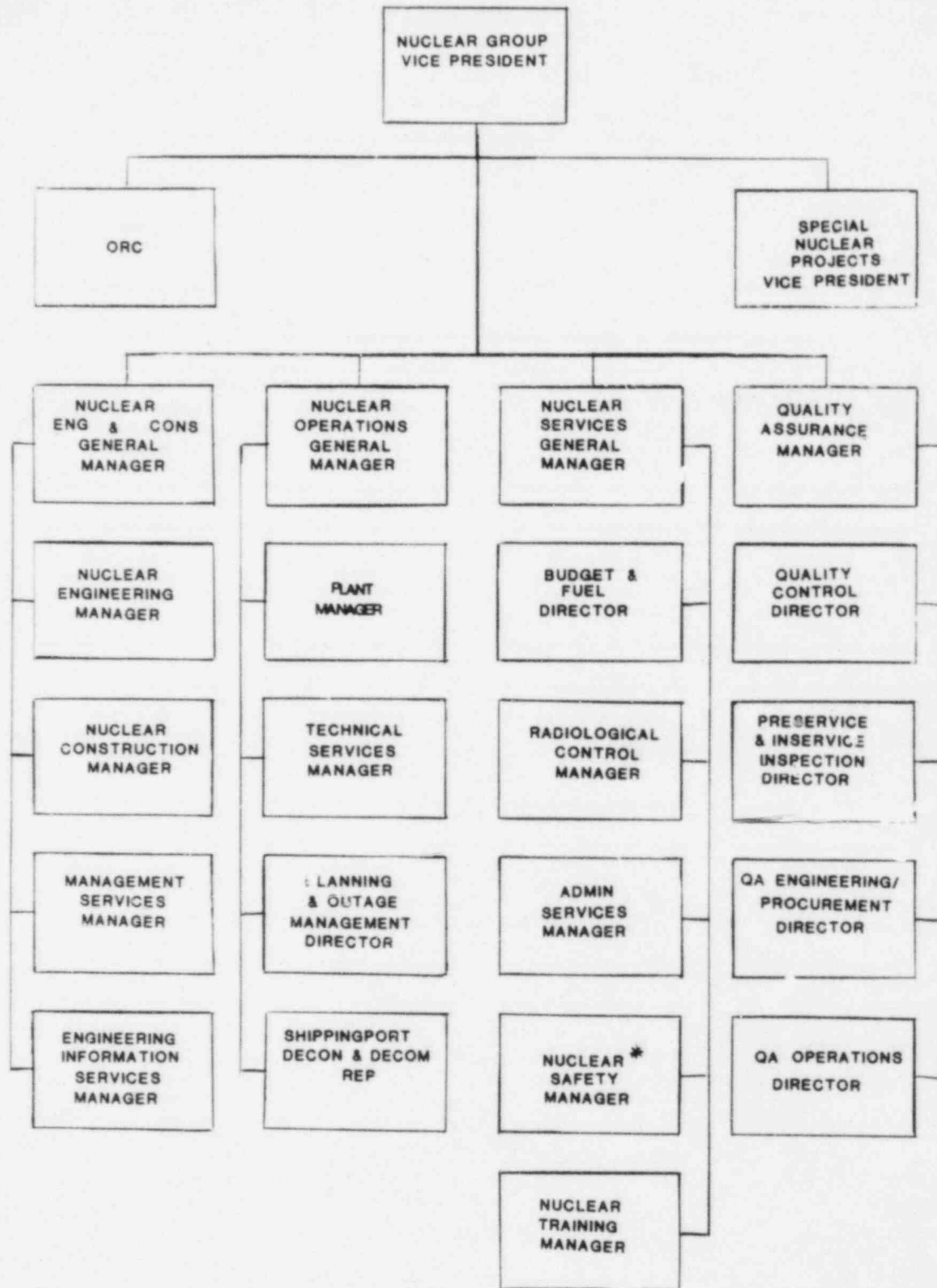
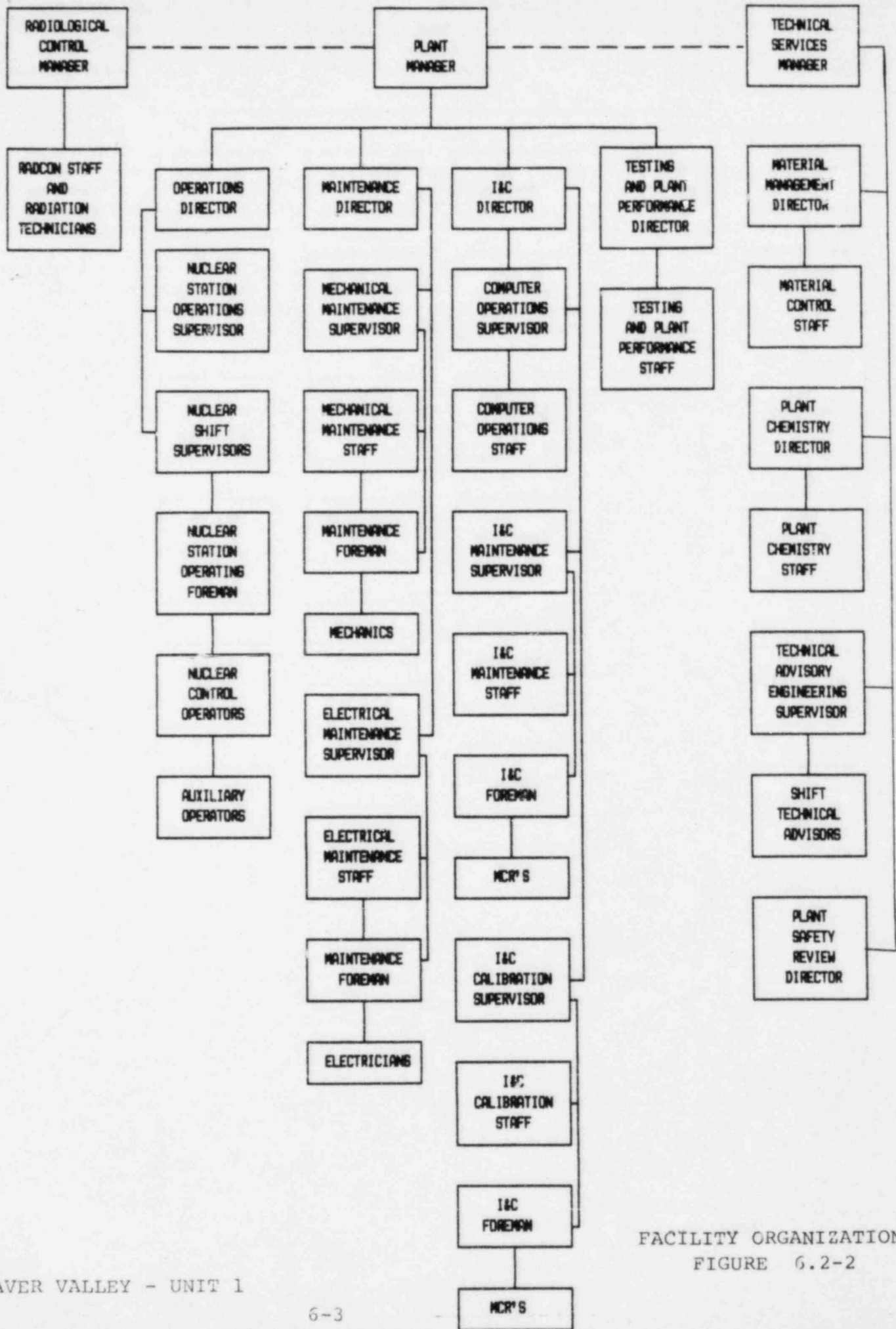


FIGURE 6.2-1
CORPORATE ORGANIZATION (PARTIAL)

* FIRE PROTECTION PROGRAM RESPONSIBILITY



FACILITY ORGANIZATION
FIGURE 6.2-2

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION#SINGLE UNIT FACILITY

LICENSE CATEGORY QUALIFICATIONS	APPLICABLE MODES	
	1, 2, 3 AND 4	5 AND 6
SRO*	2	1**
RO	2	1
Non-Licensed Auxiliary Operator	2	1
Shift Technical Advisor	1	None Required

* Includes the Licensed Senior Reactor Operator serving as the Shift Supervisor.

** Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising CORE OPERATIONS.

Shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility and Radiation Protection staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiological Control Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and 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 analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear 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.

6.4.2 A Training program for the Emergency Squad shall be maintained under the direction of the Nuclear Training Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975.

6.5 REVIEW AND AUDIT

6.5.1 ONSITE SAFETY COMMITTEE (OSC)

FUNCTION

6.5.1.1 The OSC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The OSC shall be composed of the:

Chairman:	Plant Safety Review Director
Member:	Senior Licensed Operator
Member:	Radiation Control Foreman
Member:	Engineer (Maintenance)
Member:	Engineer (Nuclear Engineering)
Member:	Engineer (Testing & Plant Performance)
Member:	Shift Technical Advisor
Member:	Chemistry Representative
Member:	Quality Control Coordinator
Member:	Engineer (I&C)

NOTE: The chairman of the OSC shall appoint an individual from each of the above listed job categories to serve as a member of the OSC for a period of at least 6 months.

NOTE: OSC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The SRO shall meet the qualifications of Section 4.2.2 and the Maintenance Engineer will meet the qualifications of Section 4.2.3.

ADMINISTRATIVE CONTROLS

ALTERNATES

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

MEETING FREQUENCY

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

QUORUM

6.5.1.5 A quorum of the OSC shall consist of the Chairman or his designated alternate and at least one half of the members including alternates.

RESPONSIBILITIES

6.5.1.6 The OSC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes of intent thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- 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 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 Nuclear Operations General Manager and to the Chairman of the Offsite Review Committee.
- f. Review of all REPORTABLE EVENTS.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Offsite Review Committee.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.1.7 The OSC shall:

- a. Recommend to the Plant Manager written 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 Nuclear Operations General Manager and the Offsite Review Committee of disagreement between the OSC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The OSC shall maintain written minutes of each meeting and copies shall be provided to the Nuclear Operations General Manager and Chairman of the Offsite Review Committee.

6.5.2 OFFSITE REVIEW COMMITTEE (ORC)

FUNCTION

6.5.2.1 The ORC 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

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.2 The ORC shall be composed of the:

Chairman:	Vice President, Nuclear
Vice Chairman:	Nuclear Services General Manager
Member:	Nuclear Operations General Manager
Member:	Nuclear and Mechanical Engineering Director
Member:	Materials and Standards Engineering Director
Member:	Nuclear Engineering Manager
Member:	Site Service Manager, Westinghouse Electric Corporation
Member:	Quality Assurance Manager
Member:	Effluent Controls and Environmental Monitoring Director
Member:	Plant Manager
Member:	Outside Consultant, Chemistry and Radiochemistry
Member:	Outside Consultant, Operations and Maintenance

ALTERNATES

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

CONSULTANTS

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

MEETING FREQUENCY

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

QUORUM

6.5.2.6 A quorum of ORC shall consist of the Chairman or his designated alternate and at least one half of the members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

6.5.2.7 The ORC shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- i. Reports and meeting minutes of the OSC.
- j. The results of the Radiological Monitoring Program, annual report provided in accordance with specification 6.9.1.10.

ADMINISTRATIVE CONTROLS

AUDITS (Continued)

6.5.2.9 The ORC shall report to and advise the Vice President, Nuclear on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of ORC activities shall be prepared, approved and distributed as indicated by the following:

- a. Minutes of each ORC meeting shall be prepared for and approved by the ORC Chairman or Vice-Chairman within 14 working days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be documented in the ORC meeting minutes.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President, Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the OSC, and results of this review shall be submitted to the ORC.

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 facility shall be placed in at least HOT STANDBY within one (1) hour.
- b. The Safety Limit violation shall be reported to the Commission, the Nuclear Operations General Manager and to the ORC within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On-Site Safety Committee (OSC). This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission,, the ORC and the Nuclear Operations General Manager within 14 days of the violation.

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, November 1972.
- 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. PROCESS CONTROL PROGRAM implementation
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Each procedure and administrative policy of 6.8.1 above and changes of intent thereto, shall be reviewed by the OSC and approved by the Plant Manager, predesignated alternate or a predesignated Manager to whom the Plant Manager has assigned in writing the responsibility for review and approval of specific subjects considered by the committee, as applicable.

ADMINISTRATIVE CONTROLS

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two (2) members of the plant management staff, at least one (1) of whom hold a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the OSC and approved by the Plant Manager 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 Director of the Regional Office of Inspection and Enforcement unless otherwise noted.

STARTUP REPORTS

6.9.1.1 A summary report of plant startup and power escalation testing will 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 requested 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.

ADMINISTRATIVE CONTROLS

6.17 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

The Nuclear Services General Manager delegates the responsibility for the Radiological Environmental Monitoring Program to the Radiological Control Manager (Figure 6.2-1) or his designated alternate.

The Radiological Control Manager is responsible for administering the offsite Radiological Environmental Monitoring Program. He shall determine that the sampling program is being implemented as described to verify that the environment is adequately protected under existing procedures. He shall also have the responsibility for establishing, implementing, maintaining and approving offsite environmental program sampling, analyses and calibration procedures.

ADMINISTRATIVE CONTROLS

6.16.3 Background of what constitutes "MAJOR CHANGES" to radioactive waste systems (liquid, gaseous, and solid).

A. Background

1. 10 CFR Part 50, Section 50.34a(a) requires that each application to construct a nuclear power reactor provide a description of the equipment installed to maintain control over radioactive material in gaseous and liquid effluents produced during normal reactor operations including operational occurrences.
2. 10 CFR Part 50, Section 50.34a(b)(2) requires that each application to construct a nuclear power reactor provide an estimate of the quantity of radionuclides expected to be released annually to unrestricted areas in liquid and gaseous effluents produced during normal reactor operation.
3. 10 CFR Part 50, Section 50.34a(3) requires that each application to construct a nuclear power reactor provide a description of the provisions for packaging, storage and shipment offsite of solid waste containing radioactive materials resulting from treatment of gaseous and liquid effluents and from other sources.
4. 10 CFR Part 50, Section 50.34a(3)(c) requires that each application to operate a nuclear power reactor shall include (1) a description of the equipment and procedures for the control of gaseous and liquid effluents and for the maintenance and use of equipment installed in radioactive waste systems and (2) a revised estimate of the information required in (b)(2) if the expected releases and exposures differ significantly from the estimate submitted in the application for a construction permit.
5. The Regulatory staff's Safety Evaluation Report and amendments thereto issued prior to the issuance of an operating license contains a description of the radioactive waste systems installed in the nuclear power reactor and a detailed evaluation (including estimated releases of radioactive materials in liquid and gaseous waste and quantities of solid waste produced from normal operation, estimated annual maximum exposures to an individual in the unrestricted area and estimated exposures to the general population) which shows the capability of these systems to meet the appropriate regulations.

3/4.11 RADIOACTIVE EFFLUENTS

BASES

Revision 1, October, 1977, and Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April, 1977. NUREG-0133 provides methods for dose calculations consistent with Regulatory Guides 1.109 and 1.113.

This specification applies to the release of liquid effluents from Beaver Valley Power Station, Unit No. 1. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

3/4.11.1.3 LIQUID WASTE TREATMENT

The requirements that the appropriate portions of this system be used when specified provides assurance that the releases of radioactive materials in liquid effluents will be kept "as low as is reasonably achievable." This specification implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and design objective given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the liquid radwaste treatment system were specified as a suitable fraction of the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents. This specification applies to Beaver Valley Power Station, Unit No. 1.

3/4.11.1.4 LIQUID HOLDUP TANKS

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that the event of an uncontrolled release of the tanks' contents, the resulting concentrations would be less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest portable water supply and the nearest surface water supply in an unrestricted area.

3/4.11.2 GASEOUS EFFLUENTS

3/4.11.2.1 DOSE RATE

This specification is provided to ensure that the dose at anytime at the site boundary from gaseous effluents from all units on the site will be within the annual dose limits of 10 CFR Part 20

ATTACHMENT B

No Significant Hazard Determination

Proposed Change Request No. 106 amends the Beaver Valley Power Station, Unit No. 1 Technical Specification Administration Controls section to reflect the Nuclear Group reorganization, update the index and delete blank pages.

Description of amendment request: The proposed amendment would update the technical specification index to reflect the current status of the technical specifications. Blank pages are proposed to be deleted. Section 6, Administrative Controls has been revised to reflect the Nuclear Group reorganization. The following changes are proposed:

The index, pages I through XXVI has been updated and includes Tables and Figures.

The following pages have been revised to remove blank pages:

<u>Page</u>	<u>Change</u>
3/4 1-26	deleted a blank page
3/4 4-29	deleted a blank page
3/4 4-30	deleted a blank page
3/4 4-31	renumbered to 3/4 4-29
3/4 5-8	deleted a blank page
3/4 7-23	added a note (next page is 7-26)
3/4 7-24	deleted a blank page
3/4 7-25	deleted a blank page
3/4 11-16	added a note (next page is 3/4 11-18)
3/4 11-17	deleted a blank page
3/4 11-18	added a note (next page is 3/4 11-20)
3/4 11-19	deleted a blank page
6-15	Sections 6.9.1.9, 6.9.1.10 and 6.9.1.11 were moved to page 6-15, therefore, pages 6-16/6-17, 6-18 and 6-19 are no longer required; added a note (next page is 6-20) since the above pages would be deleted.

Sections 6.1.1, 6.2.2(g), 6.5.1.1, 6.5.1.6(a), 6.5.1.7(a), 6.5.1.7(c), 6.8.2, 6.8.3(c) revised the title Plant Superintendent to Plant Manager.

Section 6.2 and 6.2.1, changed "Offsite Organization" to specify "Corporate Organization".

Figure 6.2-1, revised the titles of the next level of management reporting to the General Managers and incorporated the next level of management reporting to the Quality Assurance Manager. The title of this figure has been revised to "Corporate Organization (Partial)".

Figure 6.2-2, revised the Facility Organization chart to identify the new titles of the personnel reporting to the Plant Manager and Technical Services Manager.

Table 6.2-1, deleted the ## note, this note was a temporary change to allow plant operation with one reactor operator to fulfill the minimum shift crew requirements until December 1, 1983. This condition has expired.

Sections 6.3.1 and 6.17, revised the title Radiological Operations Coordinator to Radiological Control Manager.

Section 6.4.1 and 6.4.2, revised the title Director, Nuclear Division Training to Nuclear Training Manager. Section 6.4.2 has also been revised to correct a typographical error to NFPA-1975.

Section 6.5.1.2, revised the titles of the OSC membership to reflect the new titles specified by the reorganization. The second note was also revised to require OSC alternate members to meet the same minimum qualifications as the OSC members.

Sections 6.5.1.6.a and 6.8.2, revised the OSC review requirements to specify changes "of intent", this would decrease the OSC work load by reducing the changes that must be reviewed by the OSC; such as correcting typographical errors, reformatting procedures and other changes not affecting the purpose for which the procedure is performed.

Section 6.5.1.6(e), 6.5.1.7(c), 6.5.1.8, 6.7.1(b), 6.7.1(d), revised the title Manager of Nuclear Operations to Nuclear Operations General Manager.

Section 6.5.2.2, revised the titles of the ORC membership to reflect the new titles specified by the reorganization.

Section 6.5.1.5, revised the number of OSC members required to fulfill a quorum and specify a quorum will consist of at least one half of the members.

Section 6.5.2.6, revised the number of ORC members required to fulfill a quorum to specify a quorum will consist of at least half of the members.

Section 6.5.2.7(j), revised this ORC review requirement to reference the Radiological Environmental Monitoring Program and annual report provided in accordance with specification 6.9.1.10.

Section 6.5.2.10.a has been revised to require preparation and approval of the ORC meeting minutes within 14 working days following each meeting. This change would allow adequate time for preparation, review and approval of the minutes in consideration of vacations, holidays, weekends and the additional level of approval required in accordance with the reorganization. In addition, this section has been revised to allow the ORC Vice-Chairman to review and approve the ORC meeting minutes.

Section 6.5.2.10.b has been revised to require the reports of reviews encompassed by Section 6.5.2.7 to be documented in the ORC meeting minutes.

Section 6.5.2.10.d has been deleted since the Vice President, Nuclear is the ORC chairman and performs the ORC meeting minute review and approval.

Section 6.13.3, to correct a typographical error; this was renumbered to 6.16.3.

Section 6.17, revised the title Manager of Nuclear Safety and Licensing to Nuclear Services General Manager.

Section B 3/4 11.1.4, to correct a typographical error 10CFR20 Appendix A was revised to Appendix B.

Basis for proposed no significant hazards consideration determination: The proposed amendment is considered to be administrative in nature since updating the index, deleting blank pages and the reorganization, including title changes and minor editorial revisions will have no adverse effect on the safe operation of the plant.

Based on the criteria for defining no significant hazards consideration set forth in 10CFR 50.92(c), plant operation in accordance with the proposed amendment would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated since the changes are administrative in nature and the title changes and minor editorial revisions will have no adverse effect on the safe operation of the plant. The OSC and ORC membership will continue to perform the required functions and maintain a sufficient level of personnel experience to provide the required review capability.
- (2) create the possibility of a new or different kind of accident from any previously evaluated since no change in plant operations or to equipment or components is required; the changes reflect the Nuclear Group reorganization and will not affect the safe operation of the plant.

- (3) involve a significant reduction in the margin of safety since the changes are administrative in nature, will not affect the safe operation of the plant and do not affect the bases for any technical specification.

Therefore, based on the above, it is proposed to characterize the change as involving a no significant hazard consideration.