

Title	Procedure for Nuclear Safety and Environmental Impact Review and Approval of Documents	Revision No. 3
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	Signature	Concurring Organizational Element	Date
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1.0 PURPOSE

To establish a procedure to implement and control the GPU Nuclear Safety Review and Approval Process by:

- 1.1 Identifying the parties and responsibilities for the preparation, review, and approval of specific documents or types of documents.
- 1.2 Establishing the requirements for the certification of Responsible Technical Reviewers and Independent Safety Reviewers.
- 1.3 Specifying the procedure for processing changes to the Review and Approval Matrices.
- 1.4 Establishing the requirement for and responsibilities of Division Safety Review Coordinators.
- 1.5 Establishing the requirements for the development and retention of records associated with the review and approval process.

2.0 APPLICABILITY/SCOPE

- 2.1 This procedure applies to each Division of GPU Nuclear that prepares, reviews, or approves documents (as defined in 2.2 below) that pertain to TMI-1 or Oyster Creek nuclear facilities.
- 2.2 Documents and substantive revisions of documents, which are within QA Plan scope, shall be prepared, reviewed and approved in accordance with this procedure if:
 - 2.2.1 they are listed on the Review and Approval Matrices, (Exhibits 1 and 2 of this procedure) and
 - 2.2.2 they have the potential to adversely affect nuclear safety or safe plant operations, or
 - 2.2.3 they involve a 50.59 Consideration, or
 - 2.2.4 they involve an Unreviewed Safety Question, or
 - 2.2.5 they involve a change to the Technical Specifications or any other Licensing Basis Document, or
 - 2.2.6 they have any Potential Environmental Impact, or
 - 2.2.7 the Technical Specifications or other corporate requirements so specify.

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- 2.3 This procedure applies only to substantive revisions of documents. Non-substantive revisions are those which do not affect the activities associated with the document or the document's meaning or intent. Examples of non-substantive changes are:
- 2.3.1 Correcting spelling.
 - 2.3.2 Adding (but not deleting) sign-off spaces.
 - 2.3.3 Blocking in notes, cautions, etc.
 - 2.3.4 Changes in corporate and personnel titles which do not reassign responsibilities and which are not referred to in the Technical Specifications.
 - 2.3.5 Changes in nomenclature or editorial changes which clearly do not change function, meaning, or intent.

3.0 DEFINITIONS

- 3.1 CONCURRENCE - Written agreement that the provisions in a document for which review has been requested are acceptable for implementation within, or from the standpoint of, the signer's area of responsibility.
- 3.2 CROSS-DISCIPLINARY REVIEW - A review performed by one or more individuals representing more than one specialty area or perspective.
- 3.3 50.59 CONSIDERATION (Reference 6.8)-
 - 3.3.1 A change to the facility as described in the safety analysis report.
 - 3.3.2 A change in the procedures as described in the safety analysis report.
 - 3.3.3 The performance of a test or experiment not described in the safety analysis report.
- 3.4 POTENTIAL ENVIRONMENTAL IMPACT

Any proposed activity, change, facility expansion, production increase, process modification, test or experiment which could result in any of the following:

 - 3.4.1 A release or potential release of non-radioactive material (gas or liquid) to the environment.

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- 3.4.2 A change in any systems, components, or actions which affect the control or monitoring of actual or potential releases of non-radioactive materials to the environment.
- 3.4.3 A physical or chemical change in the characteristics of plant discharges, effluents, withdrawals, or other plant interfaces with the environment.
- 3.4.4 Disposition or storage for disposition of any non-radioactive waste material.
- 3.5 IMPLEMENTING APPROVAL - The signature of a Manager (or person with a higher title) which indicates that the document has been properly prepared and reviewed and is thereby released for implementation.
- 3.6 IMPORTANT TO SAFETY (ITS) (Reference 6.9) - A special classification or category of those structures, systems, components and activities that provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public. It encompasses the broad class of plant features covered (not necessarily explicitly) in the General Design Criteria, (10CFR50 Appendix A), that contribute in important ways to the safe operation and protection of the public in all phases and aspects of facility operation (i.e., normal operation, transient control, and accident mitigation). It includes Safety-Related as a subset. For software, this classification has been replaced by the terms QA Plan Scope and Safety Review Required (Reference 6.1).
- 3.7 INDEPENDENT SAFETY REVIEW - An independent verification of a document to the extent necessary to verify safety adequacy. It should include:
 - 3.7.1 Review of technical aspects.
 - 3.7.2 Review of any associated Safety Evaluation.
 - 3.7.3 Review of reportable events, including the results of any investigations made, and the recommendations resulting from such investigations, to prevent or reduce the probability of recurrence of the event.
 - 3.7.4 Other subjects as required by Technical Specification Section 6.5.2.5.
- 3.8 INDEPENDENT SAFETY REVIEWER (ISR) - An individual who performs an Independent Safety Review. If the Independent Safety Review is accomplished by more than one person, the individual whose signature attests the review shall be the Independent Safety Reviewer.

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- 3.9 LICENSING BASIS DOCUMENT (LBD) - Any document which is part of the licensing basis of the plant. Examples of Licensing Basis Documents include: FSAR, Technical Specifications, Emergency Plan, Offsite Dose Calculation Manual, Security Plan, Fire Protection Plan, In-Service Inspection Plan, Radiation Protection Plan, Quality Assurance Plan, and Process Control Program.
- 3.10 ORIGINATOR - The person who is responsible for the development of items such as Policies, Plans, Procedures or other documents. Also referred to as the preparer.
- 3.11 RESPONSIBLE TECHNICAL REVIEWER (RTR) - An individual who performs a Technical Review. If the Technical Review is accomplished by more than one person, the individual whose signature attests the review shall be the Responsible Technical Reviewer.
- 3.12 SAFETY DETERMINATION (Exhibit 7) - A determination of whether a document:
- 3.12.1 Has any potential impact on nuclear safety or safe plant operations and, as a result, should have a written safety evaluation, and/or
 - 3.12.2 Involves a change to the Technical Specifications, FSAR, or other Licensing Basis Document, and/or
 - 3.12.3 Involves an Unreviewed Safety Question, and/or
 - 3.12.4 Involves any potential environmental impact.
- 3.13 SAFETY EVALUATION (Exhibit 8) - An assessment of a document which provides the written basis for determining:
- 3.13.1 Whether an Unreviewed Safety Question is involved, (Refer to Definition 3.17) and/or
 - 3.13.2 Whether the margin of safety, as defined in Licensing Basis Documents other than the Technical Specification, is reduced and/or
 - 3.13.3 Whether the document can be implemented without adversely affecting nuclear safety.
- 3.14 SAFETY RELATED - (Reference 6.8) A term which refers to those structures, systems, or components necessary to assure:
- 3.14.1 The integrity of the reactor coolant pressure boundary, or

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- 3.14.2 The capability to shut down the reactor and maintain it in a safe shutdown condition, or
- 3.14.3 The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the guideline exposures of 10 CFR 100.
- 3.15 TECHNICAL REVIEW - A verification of the technical and safety adequacy of a document. It is a thorough review from a technical standpoint, and will include applicable items delineated in Definition 3.7.
- 3.16 TECHNICAL SPECIFICATIONS - The part of the operating license of each unit which governs operating limits and administrative requirements for the power plant.
- 3.17 UNREVIEWED SAFETY QUESTION - Any proposed action which:
 - 3.17.1 May increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report; or
 - 3.17.2 May create a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report; or
 - 3.17.3 Reduces the margin of safety as defined in the basis for any Technical Specification.

4.0 PROCEDURE

4.1 SUMMARY OF REVIEW AND APPROVAL TREATMENT

- 4.1.1 Exhibit 3 outlines steps to follow to decide if this procedure applies to a document.

Other reviews and approvals of documents may be required by procedures or agreements outside the scope of this procedure.

The Originator initially decides if the review and approval process of this procedure applies to a particular document. If this procedure applies, the resulting process will be as described in 4.1.2, 4.1.3, or 4.1.4. (also see Exhibit 4). If this procedure applies, the Originator will indicate that a Safety Review is required by checking the appropriate "Yes" block on the document cover page. If this procedure does not apply, the "Safety Review Required" block will be checked "No" (Reference 6.1).

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4.1.2 Matrix Section I and II Documents

When this procedure applies, matrix Section I and II type documents shall always have a Safety Determination (Ref. Section 4.2), and shall always be given a Technical Review.

If the Originator and RTR agree that the Safety Determination is negative, the document is submitted for Implementing Approval.

If the Safety Determination has the appropriate "yes" answers, a written Safety Evaluation must also be prepared by the Originator.

The document package is then given a Technical Review. If the Originator and RTR agree that an Unreviewed Safety Question (USQ) or Technical Specification Change (TSC) is not involved, the document may be submitted for Implementing Approval. (Refer to Section 4.14 if the Originator and RTR agree that an USQ or TSC is involved).

An Independent Safety Review of an affirmative Safety Determination and its associated Safety Evaluation is always required, but need not be done before Implementing Approval unless an USQ or TSC is involved.

Exhibit 5 summarizes the process for Matrix Section I and II documents.

4.1.3 Matrix Section III Documents

This procedure always applies to Matrix Section III type documents.

A Safety Determination is not required.

A written Safety Evaluation is required for Technical Specification/License change requests.

The required content of Licensee Event Reports is sufficiently detailed so that, for LERs, a separate, written Safety Evaluation is not required.

Exhibit 6 summarizes the process for Matrix Section III documents.

4.1.4 Matrix Section IV Documents

Section IV of the Matrices is a miscellany of document types which should be reviewed for potential safety

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significance to determine if the requirements of Technical Specification Section 6.5.2.5 apply. The requirements for review and approval of these documents shall be covered by Division level procedures. When Technical Review, Independent Safety Review, and/or Implementing Approval is required, they shall be performed in accordance with this procedure.

- 4.1.5 It is not anticipated that this procedure will be considered applicable to any document of a type not listed on the appropriate Matrix.

However, the requirements of Section 2 notwithstanding, should an Originator and the document's approver decide that this procedure should apply, the document shall be processed in accordance with Section I.A.1 of the appropriate Matrix, with cross-disciplinary input or specialist assistance obtained as required. This procedure's Originator should be notified so that a revision to the Matrices can be considered.

Exhibit 3 identifies some considerations that may be reviewed to confirm that this procedure is not applicable to a document of a type not on the Matrices.

- 4.1.6 Calculations and analyses which provide the basis for establishing or changing an operating parameter, which can have an effect on nuclear safety, such as trip points and alarm points, need to be design verified. The criteria for determining the need for design verification is contained in Technical Functions Division procedure 5000-ADM-7311.01. The method for performing design verification is contained in Technical Functions Division procedure 5000-ADM-7311.02. All Divisions shall utilize these procedures or approved equivalent procedures.

4.2 SAFETY DETERMINATION (Exhibit 7)

The purpose of a Safety Determination is to determine if documents, document changes, or facility changes, tests, and experiments have any potential environmental impact or have potential safety significance.

Safety Determinations shall be documented on the Safety/Environmental Determination and 50.59 Review form, Exhibit 7, or on other forms which include the basic elements of Exhibit 7, unless Safety Determinations that differ in content are specified in Division implementing procedures.

Safety Determination variations are permitted to provide better guidance in determining the potential safety significance of particular documents than may be provided by Exhibit 7.

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Safety Determinations that differ in content from Exhibit 7, if used, shall be:

- a) formally established by Division implementing procedure(s),
- b) structured so that "yes" answers to the questions asked will require that a written Safety Evaluation be prepared, and
- c) in full compliance with Technical Specifications and other Regulatory requirements.

Question No. 3 on Exhibit 7 addresses the potential adverse affects on nuclear safety or safe plant operations. In answering this question, consideration should be given to the potential interaction with safety related items (i.e., systems, structures, or components) which may result from the proposed change. For example, scaffolding which is erected in the plant should be evaluated with respect to its potential to adversely affect safety related items by falling or by preventing the performance of an intended safety related function (e.g., blocking a valve closure).

4.3 SAFETY EVALUATION (Exhibit 8)

The purpose of the Safety Evaluation is to determine if documents, document changes, tests and experiments will result in an Unreviewed Safety Question or a Technical Specification Change, or will impact on nuclear safety.

A Safety Evaluation, as defined in this procedure, is broader than the Safety Evaluation required by 10 CFR 50.59. This enables the GPUN safety review and approval process to encompass documents that do not clearly involve a 50.59 Consideration but which still may present safety concerns.

Unless otherwise specified in Division implementing procedures, Safety Evaluations shall be documented on the Safety Evaluation form, Exhibit 8, or on other forms which include the basic elements of Exhibit 8.

When Safety Determination forms other than Exhibit 7 are used, as permitted in section 4.2, Safety Evaluation forms different than Exhibit 8 are permitted. If used, these alternative forms shall be:

- a) formally established by Division implementing procedures,
- b) consistent with the Safety Determination form used, and
- c) in full compliance with Technical Specifications and Regulatory requirements.

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Safety Evaluations which consist only of a simple statement or conclusion are not sufficient. The scope of a Safety Evaluation must be commensurate with the potential safety significance of the document, and the depth sufficient to determine that the document adequately addresses related safety concerns.

4.4 PREPARATION

4.4.1 The Originator's responsibilities include:

- 4.4.1.1 Preparing a document which adequately considers pertinent technical and safety concerns.
- 4.4.1.2 Preparing a document which complies with applicable regulatory and procedural requirements.
- 4.4.1.3 Determining the need for and obtaining cross-disciplinary inputs or specialist assistance, as required.
- 4.4.1.4 Determining the extent of applicability of this procedure by performing the Safety/Environmental Determination and 50.59 Review. For Safety Determinations which do not require written Safety Evaluations; that is, for those instances in which the answers to questions 3, 4, 5, and 6 on Exhibit 7 are all "No", the Originator is required to provide written justification.
- 4.4.1.5 Identifying any additional reviews required by this procedure or by division policies, practices, or agreements, e.g., Rad Con, Environmental, QA, etc.
- 4.4.1.6 When required by the Safety/Environmental Determination and 50.59 Review, preparing a written Safety Evaluation.
- 4.4.1.7 Resolving comments received during the review and approval process.

- 4.4.2 If the Originator determines that a written safety evaluation is not required for a document type or for a change to a document type that is listed on the Matrices, that determination and written justification shall be reviewed and concurred with by the Originator's management. If the management

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individual is not an RTR, then the determination shall also be reviewed and concurred with by an RTR.

- 4.4.3 The Originator shall be responsible for the resolution of comments made during the review and approval process. Disagreements regarding the incorporation of comments, which cannot be resolved by the Originator, shall be referred to successively higher levels of authority. If agreement cannot be reached, final resolution shall be as determined by the parties designated to approve in the applicable matrix.

4.5 TECHNICAL REVIEW

- 4.5.1 The Responsible Technical Reviewer is responsible for:

- 4.5.1.1 Performing a thorough review to ensure that:

- a) Activities performed in accordance with the documents being reviewed will be technically correct and concordant with safe operations, and,
- b) Temporary, interim, or permanent configuration changes to structures, systems, and components as a result of the documents being reviewed are technically correct and concordant with safe operations.

- 4.5.1.2 Determining the need for and obtaining cross-disciplinary inputs or specialist assistance to perform the Technical Review.

- 4.5.2 If a Safety/Environmental Determination and 50.59 Review concludes that a written Safety Evaluation is not required, the signature of the Responsible Technical Reviewer signifies concurrence with the Determination and that an Unreviewed Safety Question does not exist and a Technical Specification change is not required.

The signature of the Responsible Technical Reviewer signifies concurrence that technical and safety considerations have been properly addressed, that any associated Safety Determinations and Safety Evaluations are accurate and complete, and that cross-disciplinary reviews associated with the Technical Review were acceptably performed by appropriate individuals.

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This signature also indicates that the RTR was appropriately independent of the Originator and releases the document for further processing in accordance with this procedure.

- 4.5.3 Cross-disciplinary review or technical input from individuals who are not qualified as RTRs may be accepted by the Responsible Technical Reviewer.

4.6 INDEPENDENT SAFETY REVIEW

- 4.6.1 The Independent Safety Reviewer is responsible for

4.6.1.1 Performing a thorough review to confirm that:

- a) The safety significant aspects of the document have been properly addressed.
- b) The Safety Evaluation, if required, is complete and accurate.

4.6.1.2 Determining the need for and obtaining cross-disciplinary inputs or specialist assistance to perform the Independent Safety Review.

- 4.6.2 The signature of the Independent Safety Reviewer signifies concurrence that safety considerations have been adequately evaluated and are properly addressed in any associated Safety Determination or Safety Evaluation.

This signature also indicates that cross-disciplinary tasks associated with the Independent Safety Review were acceptably performed by appropriate individuals, and that the Reviewer was appropriately independent of the Originator and the RTR.

- 4.6.3 The Independent Safety Review of documents that do not involve an Unreviewed Safety Question or a Technical Specification Change may be performed after Implementing Approval.

For documents which involve an Unreviewed Safety Question or a Technical Specification Change, refer to Section 4.14.

4.7 IMPLEMENTING APPROVAL

- 4.7.1 Documents shall be approved for implementation by the individual(s) designated in the applicable Matrix, or their designees.

4.7.2 The signature of the Implementing Approver on the document signifies that the document has been properly prepared and reviewed, that concurrence signatures, if required, have been obtained, and that the document is released for implementation.

4.8 CERTIFICATION OF INDIVIDUALS

Certifiers shall be GPUNC employees.

Formal certification of Originators is not required.

Responsible Technical Reviewers (RTRs) and Independent Safety Reviewers (ISRs) shall be certified by their respective division based on meeting the minimum qualification and training requirements specified in this procedure.

Transferred employees shall be recertified by their new department. Such recertification may be based solely on the training and experience documented by the previous certification.

Certification of RTRs and ISRs shall be documented using a form equivalent to Exhibit 9. This certification shall be by the individual's immediate supervisor or a higher management position in the reporting chain, or as designated in division procedures.

A list of currently certified reviewers shall be maintained for each Division by its respective Safety Review Coordinator. (Refer to Section 4.15).

Consultants/contractors may be certified as RTRs or ISRs by the responsible Division Director only.

Certification shall be based on meeting the Qualification and Training requirements specified in 4.8.1 and 4.8.2 below.

4.8.1 Qualifications

4.8.1.1 Preparers shall be sufficiently knowledgeable in the subject areas so that, with appropriate task supervision, the document being prepared will be technically correct and adequate from the standpoint of plant safety.

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- 4.8.1.2 RTRs in the areas of Reactor Engineering, Instrumentation and Control, Chemistry and Radiochemistry, Radiation Protection, and Quality Assurance shall meet or exceed the qualifications of ANSI/ANS - 3.1 - 1978 Section 4.4, or else shall have seven years of appropriate experience in their specialty.

Reviewers in other areas (e.g. Welding, Operations, Maintenance) shall have a Bachelor's Degree in Engineering or the Physical Sciences and three years nuclear power experience, or else shall have seven years of appropriate experience in their specialty.

Reviewers may be competent in more than one specialty. Experience in different specialties may have been acquired simultaneously.

- 4.8.1.3 ISRs shall have either a Bachelor's Degree in Engineering or the Physical Sciences and five years of professional-level experience in the area being reviewed, or else shall have nine years of appropriate experience in their specialty.

- 4.8.1.4 Reviewers may be qualified to perform reviews in more than one specialty. Experience in different specialties may have been acquired simultaneously.

Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

4.8.2 Training

- 4.8.2.1 RTRs and ISRs shall complete an initial training program prior to certification.

- 4.8.2.2 RTRs and ISRs shall complete an approved refresher training program approximately every two years following initial certification. If refresher training is not completed within two years, six months, certification shall be suspended until refresher training is completed.

4.8.2.3 The Safety Review initial and refresher training program shall be approved by the Manager, Corporate Training.

4.9 SELECTION OF INDIVIDUALS

4.9.1 The individual who assigns a task to an Originator, RTR, or ISR is responsible for ensuring that the individual selected has the knowledge and experience needed to perform the task, or to determine when cross-disciplinary or specialist assistance is required.

4.9.2 The RTR must be knowledgeable and experienced in the area of the review.

The RTR cannot be the Originator or Independent Safety Reviewer.

The RTR may be from the same organization as the Preparer, and may be the supervisor or manager who approves the document.

4.9.3 The ISR must be knowledgeable and experienced in the area of the review.

The ISR cannot be the Originator, RTR, Implementing Approver or an individual having direct responsibility for performance of the activities under review.

The ISR may be from the same functional organization as the Preparer and RTR.

4.10 REVIEW AND APPROVAL MATRICES

4.10.1 The Review and Approval Matrices show which position or group shall prepare, review, and approve various kinds of documents that may apply to TMI-1 or Oyster Creek facilities (see Exhibits 1 and 2).

The "Subject" column of each Matrix lists those categories of documents which may require reviews in accordance with this procedure. The other columns indicate the division, group, or position (e.g., Preparer) responsible for the specified function.

4.11 REVIEW AND APPROVAL OF TEMPORARY CHANGES PERMITTED BY TECHNICAL SPECIFICATION

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- 4.11.1 In accordance with each plant's Technical Specifications (Section 6.8.3 for both) temporary changes may be made to procedures provided that:

4.11.1.1 The intent of the original procedure is not altered, and

4.11.1.2 The temporary change is approved by two members of GPUNC Management Staff who are certified Responsible Technical Reviewers and are knowledgeable in the area affected by the procedure.

For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision holding a Senior Reactor Operator's license on the unit, and

4.11.1.3 The temporary change is documented, reviewed, and approved within 14 days of implementation.

4.11.1.4 Temporary changes can only be made if the affected organization has procedures detailing how these changes will be made.

Such procedures shall as a minimum reflect the Technical Specification requirements for Safety Review and Approval. Modified or additional review and approval requirements may be specified in such procedures as agreed to by the parties involved.

4.12 INDEPENDENT ONSITE SAFETY REVIEW GROUP

4.12.1 The Independent Onsite Safety Review Group (IOSRG) may perform supplemental reviews of any documents from the Review and Approval Matrices.

4.12.2 IOSRG shall review documents on a selective basis, with a depth and scope commensurate with the actual or potential safety concern. These reviews may include assessments of the actual activities governed by the document.

4.12.3 The Manager, Nuclear Safety shall direct IOSRG reviews of documents and associated activities.

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4.12.4 The Manager, Nuclear Safety shall approve reports of IOSRG evaluations and assessments, and shall submit these reports to the NSA Director, Planning and Nuclear Safety Division Director, and other Division Directors and management positions who are responsible for the area reviewed.

4.12.5 IOSRG members shall have either:

4.12.5.1 A Bachelor's Degree in Engineering or appropriate Physical Science and three years of professional level experience in the nuclear power field which may include technical supporting functions or

4.12.5.2 Eight years of appropriate experience in nuclear power plant operations and/or technology.

4.12.5.3 Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

4.13 CHANGES TO THIS PROCEDURE

4.13.1 Changes to the Matrices

4.13.1.1 Changes to the matrices may be required as a result of an amendment to the Technical Specification, regulatory agency change notice, or at the request of a Division.

A change to a Matrix is initiated by a request from Licensing or the Director of the Division proposing the change, to the Nuclear Safety Assessment Director. A copy shall be sent to the Directors of the Divisions affected by the change. The request shall include the reason for the change, and the required date, if any.

4.13.1.2 The Nuclear Safety Assessment Department (NSAD) shall review the requested change, prepare a draft revision to the Matrix, and complete the Responsible Technical Review. NSAD will submit the draft revision to GPUN Licensing and to the Directors of the Divisions affected by the change for concurrence.

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4.13.1.3 Licensing shall perform an Independent Safety Review of the proposed revision. If it is determined that an Unreviewed Safety Question (USQ) or Technical Specification Change (TSC) is involved, the proposed revision shall be processed in accordance with the applicable procedures. Otherwise, Licensing shall complete the Independent Safety Review, and return the revision package to NSAD.

4.13.1.4 NSAD shall distribute the proposed revision to the affected Division Directors and shall coordinate the resolution of all comments on the proposed revision. Those comments which cannot be resolved by NSAD shall be referred to the appropriate Division Directors for resolution.

4.13.1.5 Written concurrence from Division Directors affected by the proposed revision is required.

4.13.1.6 After obtaining the required concurrence signatures, NSAD shall forward the revision to Information Management for formal incorporation into the procedure. Information Management shall obtain the implementing approval from the Office of the President.

4.13.1.7 The approved revision shall be distributed in accordance with GPU Nuclear Procedure 1000-ADM-1218.01.

4.13.2 Other Changes

4.13.2.1 All other changes to this procedure shall be processed in accordance with GPU Nuclear Procedure 1000-ADM-1218.02. Changes to the matrices, that occur at the same time as other changes, shall also be processed in accordance with 1000-ADM-1218.02. In either case, an Independent Safety Review shall be performed by Licensing.

4.14 UNREVIEWED SAFETY QUESTIONS/TECHNICAL SPECIFICATION CHANGES

Title	Procedure for Nuclear Safety and Environmental Impact Review and Approval of Documents	Revision No. 1
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- 4.14.1 Documents that involve an Unreviewed Safety Question or Technical Specification Change must receive an Independent Safety Review before submittal to the NRC.

A review of the Technical Specification Change and/or Unreviewed Safety Question by the Independent Onsite Safety Review Group (IOSRG) is also required before implementation of the amendment authorizing the change. This review may be performed concurrently with the Independent Safety Review.

Documents that involve an Unreviewed Safety Question or Technical Specification Change require NRC approval before being submitted for Implementing Approval.

4.15 DIVISION SAFETY REVIEW COORDINATOR

- 4.15.1 Each Division shall designate a primary Safety Review Coordinator.

This individual shall serve as the Division's representative for intradivisional, interdivisional, and corporate level matters concerning this procedure and its implementation, and other related activities or issues such as Safety Review Process training.

- 4.15.2 Additional responsibilities, which may be delegated to other designated individuals within a Division, include:

4.15.2.1 Coordinating the development, implementation, and presentation of appropriate training modules for use in initial and refresher Safety Review Process training programs within each Division as required by the cognizant Division Director.

4.15.2.2 Coordinating the performance of Safety Reviews requested of the Coordinator's department or division by another organization. This includes determining the need for cross-disciplinary reviews, assigning Safety Reviews and tracking the documents within the Coordinator's organization.

4.15.2.3 Transmitting and tracking documents developed within the Coordinator's group which require Safety Review by other organizations.

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- 4.15.2.4 Preparing reports of Independent Safety Reviews per each plant's Technical Specification (Section 6.5.2.7 for both) and transmitting this report to the cognizant Division Director at least annually. (See 4.16.1.3 below.)
- 4.15.2.5 Ensuring the retention of records of all Safety Evaluations and Independent Safety Reviews associated with documents originating within the Coordinator's division.
- 4.15.2.6 Ensuring the retention of RTR and ISR certification records.
- 4.15.2.7 Maintaining records and listings of all currently certified RTRs and ISRs within the Coordinator's division, and publishing a list of certified RTRs and ISRs at least annually.
- 4.15.2.8 Providing or obtaining guidance or interpretations regarding the implementation of this procedure.
- 4.15.2.9 Performing an annual review of the Review and Approval Matrices.

4.16 RECORDS AND REPORTS

- 4.16.1 The following records will be developed and maintained as noted:
 - 4.16.1.1 Records of certification of Responsible Technical Reviewers, Independent Safety Reviewers and IOSRG members shall be developed by appropriate Divisions and shall be maintained for the duration of the operating license.
 - 4.16.1.2 Records of Independent Safety Reviews shall be maintained for the duration of the operating license.
 - 4.16.1.3 Reports of all Technical Reviews, and Independent Safety Reviews shall be prepared and transmitted, at least annually, to the responsible Division Director. They shall be maintained for the duration of the operating license.

Title	Procedure for Nuclear Safety and Environmental Impact Review and Approval of Documents	Revision No. 1
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- 4.16.1.4 Reports of evaluations and assessments by IOSRG shall be maintained for the duration of the operating license.
- 4.16.1.5 Records of changes to operating procedures which are within QA Plan Scope shall be retained for 5 years.
- 4.16.1.6 All records required in 4.16 will be forwarded to, and maintained by, the document control groups.

5.0 RESPONSIBILITIES

- 5.1 OFFICE OF THE PRESIDENT - Responsible for approving this Procedure and its revisions.
- 5.2 DIVISION DIRECTORS - Responsible for:
 - 5.2.1 Developing and implementing Divisional procedures as required to implement the requirements of this Procedure.
 - 5.2.2 Concurring with this Procedure and any Divisional procedures which address interdivisional responsibilities.
 - 5.2.3 Assuring that adequate, qualified, Responsible Technical Reviewers and Independent Safety Reviewers are provided to carry out their responsibilities.
- 5.3 NUCLEAR SAFETY ASSESSMENT DIRECTOR - Responsible for this Procedure and changes to it.

6.0 REFERENCES

- 6.1 GPUN PROCEDURE, 1000-ADM-1218.01, "GPU Nuclear Policy, Plan, and Procedure System."
- 6.2 GPUN PROCEDURE, 1000-ADM-1218.02, "Document Change Request Procedure."
- 6.3 GPUN POLICY, 1000-POL-1291.00, "GPUN Nuclear and Radiation Safety Policy."
- 6.4 GPUN PROCEDURE 1000-ADM-1291.02, "GPU Nuclear Safety Review and Approval Procedure for TMI-2."
- 6.5 TMI-1 and Oyster Creek Technical Specifications, Section 6.

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- 6.6 ANSI/ANS - 3.1 - 1978, "Standard For Selection and Training of Nuclear Power Plant Personnel."
- 6.7 Regulatory Guide 1.33, Rev. 2 - 1978. Quality Assurance Program Requirements (Operations).
- 6.8 Code of Federal Regulations Title 10 Part 50.59 and Part 100, Appendix A.
- 6.9 GPU Nuclear Operational Quality Assurance Plans for Three Mile Island Unit 1 and Oyster Creek Nuclear Stations, Appendix D.
- 6.10 GPUN PROCEDURE 5000-ADM-7311.01 (EP-006), "Calculations."
- 6.11 GPUN PROCEDURE, 5000-ADM-7311.02 (EP-009), "Design Verification."

7.0 ATTACHMENTS

- 7.1 EXHIBIT 1 - GPU Nuclear Safety Review and Approval Matrix, TMI-1
- 7.2 EXHIBIT 2 - GPU Nuclear Safety Review and Approval Matrix, Oyster Creek
- 7.3 EXHIBIT 3 - Determination of the Extent of Applicability of 1000-ADM-1291.01
- 7.4 EXHIBIT 4 - Summary of Safety Review Process Alternatives
- 7.5 EXHIBIT 5 - Flow Chart for Matrix Sections I and II Documents
- 7.6 EXHIBIT 6 - Flow Chart for Matrix Section III Documents
- 7.7 EXHIBIT 7 - Safety/Environmental Determination and 50.59 Review Form
- 7.8 EXHIBIT 8 - Safety Evaluation Form
- 7.9 EXHIBIT 9 - ISR and RTR Initial Certification Form

EXHIBIT 1

TMI-1 REVIEW AND APPROVAL MATRIX

<u>SUBJECT</u>	<u>PREPARATION/ TECHNICAL REVIEW</u>	<u>INDEPENDENT SAFETY REVIEW</u>	<u>IMPLEMENTING APPROVAL</u>
I. <u>PLANS/PROCEDURES</u> §/REVISIONS			
A. <u>ADMINISTRATION</u>			
1. Procedure Review & Approval	TMI-1* Tech Functions* Quality&Rad Con Admin* Plan&Nuc Safety* MCF*	TMI-1 Tech Functions Quality&Rad Con Admin Plan&Nuc Safety MCF	Div.Dir.-TMI-1 Div.Dir.-Tech Functions Mgr.-Quality&Rad Con Div.Dir.-Admin Div.Dir.-Plan&Nuc Safety Div.Dir.-MCF
2. Temporary Change Method	Each Division*	Each Division	Each Division Director
3. Procedure Adherence	Each Division*	Each Division	Each Division Director
4. Authority & Responsibility for Safe Operations and Shutdown	TMI-1*	TMI-1	O&M Director
5. Equipment Control (lock & tag)	TMI-1*	TMI-1	O&M Director
6. Shift Relief and Turnover	TMI-1*	TMI-1	O&M Director
7. Log Entries, Record Retention & Rev. Proc.	TMI-1*	TMI-1	O&M Director
8. Access to Containment	TMI-1*	TMI-1	O&M Director
9. Bypass of Safety Functions & Jumper Control	TMI-1*	TMI-1	O&M Director
10. Main. of Minimum Shift Composition and Call in	TMI-1*	TMI-1	O&M Director
11. Communication System Procedures	TMI-1*	TMI-1	O&M Director

§ See Procedure 1000-ADM-1218.01 for review, concurrence and approval requirements
* Input from QA

EXHIBIT 1

TMI-1 REVIEW AND APPROVAL MATRIX

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
B. GENERAL PLANT OPERATING			
1. Operating (SU/Cooldown)	TMI-1	Tech Functions or TMI-1	O&M Director
2. System Operating	TMI-1	Tech Functions or TMI-1	O&M Director
3. Abnormal Operating	TMI-1	Tech Functions or TMI-1	O&M Director
4. Emergency Operating	TMI-1	Tech Functions or TMI-1	O&M Director
5. Alarm Responses	TMI-1	TMI-1 or + Tech Functions	O&M Director
6. Special Temporary	TMI-1*	TMI-1 or + Tech Functions	O&M Director
7. Fueling/Refueling	TMI-1	Tech Functions or TMI-1	O&M Director
8. Chemistry	TMI-1	Tech Functions or TMI-1	O&M Director
9. Radiochemistry	TMI-1	Tech Functions or TMI-1	O&M Director
10. Fire Protection Operating	TMI-1	TMI-1	O&M Director
11. Experiments	TMI-1 or Tech Functions	Tech Functions or TMI-1	O&M Director

+ As defined in Division procedures
 * Input from QA

EXHIBIT 1

TMI-1 REVIEW AND APPROVAL MATRIX

<u>SUBJECT</u>	<u>PREPARATION/ TECHNICAL REVIEW</u>	<u>INDEPENDENT SAFETY REVIEW</u>	<u>IMPLEMENTING APPROVAL</u>
<u>C. MAINTENANCE</u>			
1. Calibration	MCF [#] or TMI-1	TMI-1	O&M Director
2. Control of Measuring & Test Equipment	MCF [#] or TMI-1	TMI-1	O&M Director
3. Preventive Maintenance	MCF [#] or TMI-1	TMI-1	O&M Director
4. Corrective Maintenance	MCF [#] or TMI-1	TMI-1	O&M Director
<u>D. SURVEILLANCE</u>			
1. Surveillance	TMI-1 ⁺	TMI-1	O&M Director
<u>E. RADIOLOGICAL CONTROLS PROCEDURES</u>			
1. Radiological Controls	Rad Con	Rad Engr/ Rad Mgmt.	Mgr - Rad Con Approves O&M Director Concurs ⁺
2. Effluent Monitoring	Rad Con	Rad Engr/ Rad Mgmt.	Mgr - Rad Con
3. Environmental Monitoring			
a. Radiological	Radiological/ Biological	Environmental Lab/Biological	Mgr - Env Con
b. Biological	Biological/ Radiological	Radiological/ Environ. Lab	Mgr - Env Con
c. Environmental Lab	Environ. Lab	Radiological	Mgr - Env Con

⁺As defined in Division procedures

[#]MCF Division prepares procedures and performs reviews in accordance with their Work Management System which ensures that maintenance activities are performed correctly and in accordance with specified Engineering, Rad.Con., and Plant operation requirements.

TMI-1 REVIEW AND APPROVAL MATRIX

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
F. PLANS/IMPLEMENTING PROCEDURES			
1. Emergency Plan	Emergency** Preparedness	Emergency Preparedness	O/P Approves Division Dirs. Concur Emer Prep Mgr Approves O&M Dir Concurs
a. Emergency Plan Implementing Procedures (EPIP) (Except Rad Con Procedures)	Emergency Preparedness	Emergency Preparedness	
b. Emergency Plan Implementing Procedures (EPIP) (Rad Con- related)	Emergency Preparedness	Emergency Preparedness	Emer Prep Mgr Approves Mgr - Rad Con Concurs
2. Security Plan	Security	Security	Div.Dir.-Admin. Approves Mgr. Security and Div.Dir.- TMI-1 Concur Mgr - Security Approves O&M Director Concurs
a. Security Plan Implementing Procedures	Security	Security	
3. Fire Protection Program Plan	TMI-1	Tech Functions	O/P Approves Div.Dir.- TMI-1 Concurs
4. Operational QA Plan (OQAP)	QA	Quality& Rad Con	O/P Approves, Div.Dirs. and Dir. QA Concur
a. OQAP Implementing Procedures (Corporate Level-QA Dept. Responsible)	QA	QA	Director QA Approves, Affected Division Dirs. Concur
b. OQAP Implementing Procedures (Dept. Level)	QA	QA	Director - QA Approves, Affected QA Section Managers Concur
c. OQAP Implementing Procedures (Section Level)	QA	QA	QA Section Manager (or Designee) Approves, Affected QA Section/Sub- section Managers Concur
d. OQAP Implementing Procedures (Other Departments)	Tech Functions, Q & RC, Admin., MCF, P & NS	Tech Functions, Q & RC, Admin., MCF, P & NS	Responsible Div. Approves, All Affected Divs. Concur

** Input from Tech. Functions

GPU NuclearGPU Nuclear Corporate
Policy and Procedure ManualNumber
1000-ADM-1291.01Title Procedure for Nuclear Safety and Environmental Impact
Review and Approval of Documents
Revision No.

3

EXHIBIT 1

Title Procedure for Nuclear Safety and Environmental Impact
Review and Approval of Documents Revision No.

EXHIBIT 1

TMI-1 REVIEW AND APPROVAL MATRIX

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
F. PLANS/IMPLEMENTING PROCEDURES (Cont'd)			
5. Radiation Protection Plan	Rad Con	Rad Engineering	O/P Approves Div.Dir. Q & RC and all other Div.Dirs.Concur
6. Process Control Program (PCP)	TMI-1	TMI-1	O&M Director Approves
a. PCP Implementing Procedures	TMI-1	TMI-1	O&M Director Approves
7. Offsite Dose Calculation Manual (ODCM)	Rad Con or Env Con	Env. Con. or Rad Engr	Div.Dir. Q & RC
a. ODCM Implementing Rad Con Procedures	Rad Con	Rad Engr or Env. Con.	Mgr - Rad Con
b. ODCM Implementing Env Con Procedures	Env Con	Rad Engr or Env. Con.	Mgr - Env Con
8. QA Program for Effluent and Environmental Monitoring	Env Con	Rad Con or Env Con	Div.Dir. Q&RC Approves QA Director Concurs
9. Nuclear and Radiation Safety Plan	NSAD	NSAD	O/P Approves Div. Dirs. Concur

TMI-1 REVIEW AND APPROVAL MATRIX

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
II. CHANGES TO THE FACILITY			
A. Design Changes & Modification to Unit Systems & Equipment(1)			
1. PEDR review package documents such as: SDD I, Preliminary SDD II, Flow Diagrams, Elementary Diagrams, General Arrangement Dwg. & the Safety Determination/Evaluation.	Tech Functions**	Tech Functions	Mgr. Engr. Proj./ Mgr. Spec. Proj.
2. Field Change Request that changes associated Safety Determination/Evaluation.	Any Organization/ Tech Functions [@]	Tech Functions	Mgr. Engr. Proj./ Mgr. Spec. Proj.
3. Installation Procedures	MCF	TMI-1	Div. Dir./Deputy, MCF O&M Dir. Concurs
4. Startup & Test Procedure and Safety Determination/Evaluation	Tech Functions ^{oo}	TMI-1	Mgr. S&T Approves; O&M Director Concurs

- ** Preparation/Technical Review by Tech Functions or as otherwise specified in Tech Functions procedures. Concurrence as defined in Section 3.1 by TMI-1 Div. with resolution of comments per EP-008. If the nature of the modification is such that there is no PEDR package, TMI-1 Div. will review and concur with the Safety Determination/Evaluation and its associated documents. Changes to the Safety Determination/Evaluation and other PEDR review package documents will be reviewed by the PEDR Chairman and cognizant personnel in other appropriate divisions as designated by him.
- oo Input from TMI-1 Div. via Membership on the Test Approval Group. Supplemental test procedures do not require O&M Director concurrence.
- @ Changes to the Safety Determination/Evaluation will be reviewed by the PEDR Chairman and cognizant personnel in other appropriate divisions as designated by him.

Notes: (1) MCF Division prepares procedures and performs reviews in accordance with their Work Management System which ensures that the installations, modifications, and maintenance activities are performed correctly and in accordance with specified Engineering, Rad. Con. and Plant operation requirements.

GPU Nuclear		GPU Nuclear Corporate Policy and Procedure Manual	Number 1000-ADM-1291.01
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EXHIBIT 1

EXHIBIT 1

TMI-1 REVIEW AND APPROVAL MATRIX

<u>SUBJECT</u>	<u>PREPARATION/ TECHNICAL REVIEW</u>	<u>INDEPENDENT SAFETY REVIEW</u>	<u>IMPLEMENTING APPROVAL</u>
II. <u>CHANGES TO THE FACILITY (Con't)</u>			
5. Field Change Notice resulting from testing that changes associated Safety Determination/Evaluation	Startup & Test/ Tech Functions ⁶	Tech Functions	Mgr. Engr. Proj.
B. Temporary Change to Facility			
1. Applicable Procedures and Documentation	Any Division [‡] [#]	Any Division [‡]	Any Division [‡]
C. Tests & Experiments			
1. Test or Experiment Procedure including its Safety Determination/Evaluation	TMI-1 or Tech Functions	Tech Functions or TMI-1	O&M Director
III. <u>LICENSING DOCUMENTS</u>			
A. Licensee Event Report	Division Responsible for Violation	Planning & Nuc.Safety*	Div. Dir. TMI-1
B. Tech Specs/License Change Request	TMI-1 or Plan.& Nuclear Safety	Plan.&Nuc.Safety or TMI-1	Div. Dir.,TMI-1

- ⁶ Changes to the Safety Determination/Evaluation will be reviewed by the PEDR Chairman and cognizant personnel in other appropriate divisions as designated by him.
- [‡] In accord with approved Division procedures.
- [#] Any configuration change to the plant must be communicated to Technical Functions Division.
- ^{*} Licensing will assign an ISR to the appropriate department.

EXHIBIT 1

TMI-1 REVIEW AND APPROVAL MATRIX

	<u>SUBJECT</u>	<u>REVIEW COORDINATOR(2)</u>	<u>REVIEWER(3)</u>
IV.	<u>REVIEWS AND VALUATIONS (1)</u>		
A.	Violations, deviations, and reportable events which require reporting to the NRC in writing.	Division Responsible	ISR
B.	Investigation of all Violations of Technical Specifications	Division Responsible for violation	RTR
C.	Evaluate Operating Experience of the Unit & Units of Similar Design	Tech Functions	As assigned by Tech Functions
D.	Other Reviews Deemed Necessary by an Independent Safety Reviewer	Independent Safety Reviewer (ISR)	As assigned by Independent Safety Reviewer
E.	Review Written Summaries of Audit Reports	Q&RC	As assigned by Q&RC (ISR)
F.	Review of every unplanned release of radioactivity to the environment	TMI-1	As assigned by TMI-1 (RTR)

Notes:

- (1) No specific product.
- (2) Review Coordinator - is responsible to initiate or identify issues of potential safety significance and forward appropriate data to the assigned review organization and ensure that the resulting review is documented, returned and filed.
- (3) Reviewer - is responsible for the Technical Review or Independent Safety Review of assigned reviews.

OYSTER CREEK REVIEW AND APPROVAL MATRIX

<u>SUBJECT</u>	<u>PREPARATION/ TECHNICAL REVIEW</u>	<u>INDEPENDENT SAFETY REVIEW</u>	<u>IMPLEMENTING APPROVAL</u>
I. <u>PLANS/PROCEDURE\$ /REVISION</u>			
A. <u>ADMINISTRATION</u>			
1. Procedure Review & Approval	Oyster Creek ⁰ Tech Functions ⁰ Quality & Rad Con ⁰ Admin ⁰ Plan&Nuc.Safety ⁰ MCF ⁰	Oyster Creek Tech Functions Quality & Rad Con Admin Plan & Nuc.Safety MCF	Div.Dir.-Oyster Creek Div.Dir.-Tech Functions Mgr.-Quality & Rad Con Div.Dir.-Admin Div.Dir.-Plan&Nuc.Safety Div.Dir.-MCF
2. Temporary Change Method	Each Division ⁰	Each Division	Each Division Director
3. Procedure Adherence	Each Division ⁰	Each Division	Each Division Director
4. Authority & Responsibility for Safe Operations and Shutdown	O.C. Div. ⁰	O.C. Div.	Div.Dir./Deputy, O.C.
5. Equipment Control	O.C. Div. ⁰	O.C. Div.	Div.Dir./Deputy, O.C.
6. Shift Relief and Turnover	O.C. Div. ⁰	O.C. Div.	Div.Dir./Deputy, O.C.
7. Log Entries, Record Retention & Rev. Proc.	O.C. Div. ⁰	O.C. Div.	Div.Dir./Deputy, O.C.
8. Bypass of Safety Functions & Jumper Control	O.C. Div. ⁰	O.C. Div.	Div.Dir./Deputy, O.C.
9. Main. of Minimum Shift Composition and Call In	O.C. Div. ⁰	O.C. Div.	Div.Dir./Deputy, O.C.
10. Communication System Procedures	O.C. Div. ⁰	O.C. Div.	Div.Dir./Deputy, O.C.
11. Plant Administrative Procedures that either Assign Responsibilities to Individuals/Depts. or Specify General Requirements of Work Performance	O.C. Div. ⁰	O.C. Div.	Div.Dir./Deputy, O.C.

⁰ = Input from QA

\$ = See Procedure 1000-ADM-1218.01 for review, concurrence and approval requirements

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1000-ADM-1291.01Title
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Revision No.
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OYSTER CREEK REVIEW AND APPROVAL MATRIX

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
B. GENERAL PLANT OPERATING			
1. Operating (SU/Cooldown)	O.C. Div.	Tech Functions or O.C.	Div.Dir./Deputy, O.C.
2. System Operating	O.C. Div.	Tech Functions or O.C.	Div.Dir./Deputy, O.C.
3. Abnormal Operating	O.C. Div.	Tech Functions or O.C.	Div.Dir./Deputy, O.C.
4. Emergency Operating	O.C. Div.	Tech Functions or O.C.	Div.Dir./Deputy, O.C.
5. Alarm Responses	O.C. Div.	O.C. or + Tech Functions	Div.Dir./Deputy, O.C.
6. Special Temporary	O.C. Div.	O.C. or + Tech Functions	Div.Dir./Deputy, O.C.
7. Fueling/Refueling	O.C. Div.	Tech Functions or O.C.	Div.Dir./Deputy, O.C.
8. Chemistry	O.C. Div.	Tech Functions or O.C.	Div.Dir./Deputy, O.C.
9. Radiochemistry	O.C. Div.	Tech Functions or O.C.	Div.Dir./Deputy, O.C.
10. Fire Protection Operating	O.C. Div.	O.C. Div.	Div.Dir./Deputy, O.C.
11. Experiments	O.C. Div. or Tech Functions	Tech Functions or O.C. Div.	Div.Dir./Deputy, O.C.
12. Effluent Monitoring	O.C. Div.	O.C. Div.	Div.Dir./Deputy, O.C.

+ As defined in Division procedures

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EXHIBIT 2

OYSTER CREEK REVIEW AND APPROVAL MATRIX

<u>SUBJECT</u>	<u>PREPARATION/ TECHNICAL REVIEW</u>	<u>INDEPENDENT SAFETY REVIEW</u>	<u>IMPLEMENTING APPROVAL</u>
<u>C. MAINTENANCE</u>			
1. Calibration	MCF# or O.C. Div.	O.C. Div.	Div.Dir./Deputy, MCF or Oyster Creek
2. Control of Measuring & Test Equipment	MCF# or O.C. Div.	O.C. Div.	Div.Dir./Deputy, MCF or Oyster Creek
3. Preventive Maintenance	MCF# or O.C. Div.	O.C. Div.	Div.Dir./Deputy, MCF or Oyster Creek
4. Corrective Maintenance	MCF#	O.C. Div.	Div.Dir./Deputy, MCF
<u>D. SURVEILLANCE</u>			
1. Surveillance	O.C. Div.	O.C. Div.	Div.Dir./Deputy, O.C.
<u>E. RADIOLOGICAL CONTROLS PROCEDURES</u>			
1. Radiological Controls	Rad Con	Rad Engr./ Rad Mgmt.	Rad Con Director
2. Environmental Monitoring			
a. Radiological	Radiological	Biological	Mgr. - Env. Con.
b. Biological	Biological	Radiological	Mgr. - Env. Con.
<u>F. PLANS/IMPLEMENTING PROCEDURES</u>			
1. Emergency Plan	Emergency* Preparedness	Emergency Preparedness	O/P Approves Division Dirs. Concur

* = Input from Tech Functions

= MCF Division prepares procedures and performs reviews in accordance with their Work Management System which ensures that maintenance activities are performed correctly and in accordance with specified Engineering, Rad.Con., and Plant operation requirements. O.C. Division will review and concur with Corrective Maintenance Procedures as defined in MCF Division Procedure A000-WMS-1220.14.

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OYSTER CREEK REVIEW AND APPROVAL MATRIX

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
F. PLANS/IMPLEMENTING PROCEDURES (Con't.)			
a. Emergency Plan Implementing Procedures (EPIP) (Except Rad Con Procedures)	Emergency Preparedness	Emergency Preparedness	Emer Prep Mgr. Approves - Div.Dir./ Deputy, O.C. Concur
b. Emergency Plan Implementing Procedures (EPIP) (Rad Con related)	Emergency Preparedness	Emergency Preparedness	Emer Prep Mgr. Approves, - Mgr. Rad Con Concur
2. Security Plan	Security	Security	Div.Dir. Admin. Approves Mgr. Security and Div.Dir./Deputy, O.C. Concur
a. Security Plan Implementing Procedures	Security	Security	Mgr. Security Approves and Div.Dir./ Deputy, O.C. Concur
3. Fire Protection Program Plan	O.C. Div.	Tech Functions	O/P Approves and Div.Dir./Deputy, O.C. Concur
4. Operational QA Plan (OQAP)	QA	Quality & Rad Con	O/P Approves, Div.Dirs. and Dir. QA Concur
a. OQAP Implementing Procedures (Corporate Level-QA Dept.Responsible)	QA	QA	Dir.QA Approves,Affected Div. Dirs. Concur
b. OQAP Implementing Procedures (Department Level)	QA	QA	Dir.QA Approves,Affected QA Section Mgrs.Concur
c. OQAP Implementing Procedures (Section Level)	QA	QA	QA Section Mgr.(or De- signee)Approves,Affected QA Section/Subsection Managers Concur
d. OQAP Implementing Procedures (Other Departments)	Tech Functions, Q&RC Admin., MCF, Plan.& Nuclear Safety	Tech Funct'ns,Q&RC Admin., MCF,Plan.& Nuclear Safety	Responsible Division Approves, All Affected Divisions Concur
5. Radiation Protection Plan	Rad Con	Rad Engineering	O/P Approves, Div.Dir. Q&RC and All Other Div.Dirs. Concur

GPU Nuclear		GPU Nuclear Corporate Policy and Procedure Manual	Number 1000-ADM-1291.01
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OYSTER CREEK REVIEW AND APPROVAL MATRIX

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
F. PLANS/IMPLEMENTING PROCEDURES (Con't)			
6. Process Control Program (PCP)	O.C.	OC or Tech Functions	Div.Dir./Deputy,O.C.
a. PCP Implementing Procedures	O.C.	O.C. or Tech Functions	Div.Dir./Deputy,O.C.
7. Offsite Dose Calculation Manual (ODCM)	Rad Con or Env. Controls Rad Con	Env.Control or Rad Engr. or Rad Engr.or Env. Controls	Div.Dir.-Q & RC Manager - Rad Con
a. ODCM Implementing Rad Con Procedures			
b. ODCM Implementing Env.Cont.Procedures	Env. Controls	Rad Engr.or Env. Controls	Manager - Env. Controls
8. QA Program for Effluent Monitoring	O.C. Div.	O.C. Div.	Div.Dir./Deputy, O.C. Approves;Mgr. Rad Con & QA Dir.Concur
9. QA Program for Environmental Monitoring	Env. Con.	Rad Con or Env. Con.	Div.Dir. Q & RC Approves QA Director Concur
10. Nuclear and Radiation Safety Plan	NSAD	NSAD	C/P Approves Div. Dirs. Concur
II. CHANGES TO THE FACILITY			
A. Design Changes & Modification to Unit Systems & Equipment(1)			
1. PEDR review package documents such as: SDD I, Preliminary SDD II, Flow Diagrams, Elementary Diagrams, General Arrangement Dwgs & the Safety Determination/Evaluation	Tech Functions**	Tech Functions	Mgr. Engr. Proj.
2. Field Change Request that changes associated Safety Determination/Evaluation	Any Organization/ Tech Functions @	Tech Functions	Mgr. Engr. Proj.

** Preparation/Technical Review by Tech Functions or as otherwise specified in Tech Functions procedures. Concurrence as defined in Section 3.1 by O.C. Div. with resolution of comments per EP-008. If the nature of the modification is such that there is no PEDR package, O.C. Div. will review and concur with the Safety Determination/Evaluation and its associated documents. Changes to the Safety Determination/Evaluation and other PEDR review package documents will be reviewed by the PEDR Chairman and cognizant personnel in other appropriate Divisions as designated by him.

@ Changes to the Safety Determination/Evaluation will be reviewed by the PEDR Chairman and cognizant personnel in other appropriate divisions as designated by him.

Notes: (1) MCF Division prepares procedures and performs reviews in accordance with their Work Management System which ensures that the installations, modifications, and maintenance activities are performed correctly and in accordance with specified Engineering, Rad. Con. and Plant operation requirements.

GPU Nuclear

GPU Nuclear Corporate
Policy and Procedure ManualNumber
1000-ADM-1291.01

Title

Procedure for Nuclear Safety and Environmental Impact
Review and Approval of DocumentsRevision No.
3

EXHIBIT 2

OYSTER CREEK REVIEW AND APPROVAL MATRIX

SUBJECT	PREPARATION/ TECHNICAL REVIEW	INDEPENDENT SAFETY REVIEW	IMPLEMENTING APPROVAL
II. <u>CHANGES TO THE FACILITY (Con't)</u>			
3. Standard Maintenance/ Installation Procedures	MCF ⁺	O.C. Div.	Div. Dir./Deputy, MCF
4. Startup & Test Procedure and Safety Determination/Evaluation	Tech Functions ⁰⁰	O.C. Div.	Mgr. S&T Approves; Div. Dir./Deputy, O.C. Concurs
5. Field Change Notice resulting from testing that changes associated Safety Determination/ Evaluation	Startup & Test/ Tech Functions [@]	Tech Functions	Mgr. Engr. Proj.
B. Temporary Facility Variations			
1. Applicable Procedures and Documentation	Any Division [‡]	Any Division [‡]	Any Division [‡]
C. Tests & Experiments			
1. Test or Experiment Procedure including its Safety Determination/ Evaluation	O.C. Div. or Tech Functions	O.C. Div. or Tech Functions	Div. Dir./Deputy, O.C.
III. <u>LICENSING DOCUMENTS</u>			
A. Licensee Event Report	Div. Responsible for Violation	Plan. & Nuc. Safety*	Div. Dir./Deputy, O.C.
B. Tech Specs/License Change Request	O.C. Div. or Plan. & Nuc. Safety	Plan. & Nuc. Safety or O.C. Div.	Div. Dir./Deputy, O.C.

- ⁰⁰ Input from O.C. Div. via Membership on the Test Approval Group. Supplemental test procedures do not require Div. Dir./Deputy, O.C. concurrence.
- [@] Changes to the Safety Determination/Evaluation will be reviewed by the PEDR Chairman and cognizant personnel in other appropriate divisions as designated by him.
- [‡] In accord with approved Division procedures.
- * Licensing will assign an ISR to the appropriate department.
- + O.C. Division will review and concur with Standard Maintenance/Installation Procedures as defined in MCF Division Procedures A000-WMS-1220.14 and A000-ADM-1220.7.

EXHIBIT 2

Title	GPU Nuclear	
	GPU Nuclear Corporate Policy and Procedure Manual	
Revision No.	Procedure for Nuclear Safety and Environmental Impact Review and Approval of Documents	
	3	
Number	1000-ADM-1291.01	

EXHIBIT 2

OYSTER CREEK REVIEW AND APPROVAL MATRIX

<u>SUBJECT</u>	<u>REVIEW COORDINATOR(2)</u>	<u>REVIEWER(3)</u>
IV. <u>REVIEWS AND EVALUATIONS(1)</u>		
A. Violations, deviations and reportable events which require reporting to the IRC in writing.	Division Responsible	ISR
B. Investigation of all Violations of Technical Specifications	Division Responsible for Violation	RTR
C. Evaluate Operating Experience of the Unit & Units of Similar Design	Tech Functions	As assigned by Tech Functions
D. Other Reviews Deemed Necessary by an Independent Safety Reviewer	Independent Safety Reviewer (ISR)	As assigned by Independent Safety Reviewer
E. Review Written Summaries of Audit	Quality & Rad Con	As assigned by Quality & Rad Con (ISR)
F. Review of Every Unplanned Release of Radioactivity to the Environment	O.C.	As assigned by O.C. (RTR)

Note:

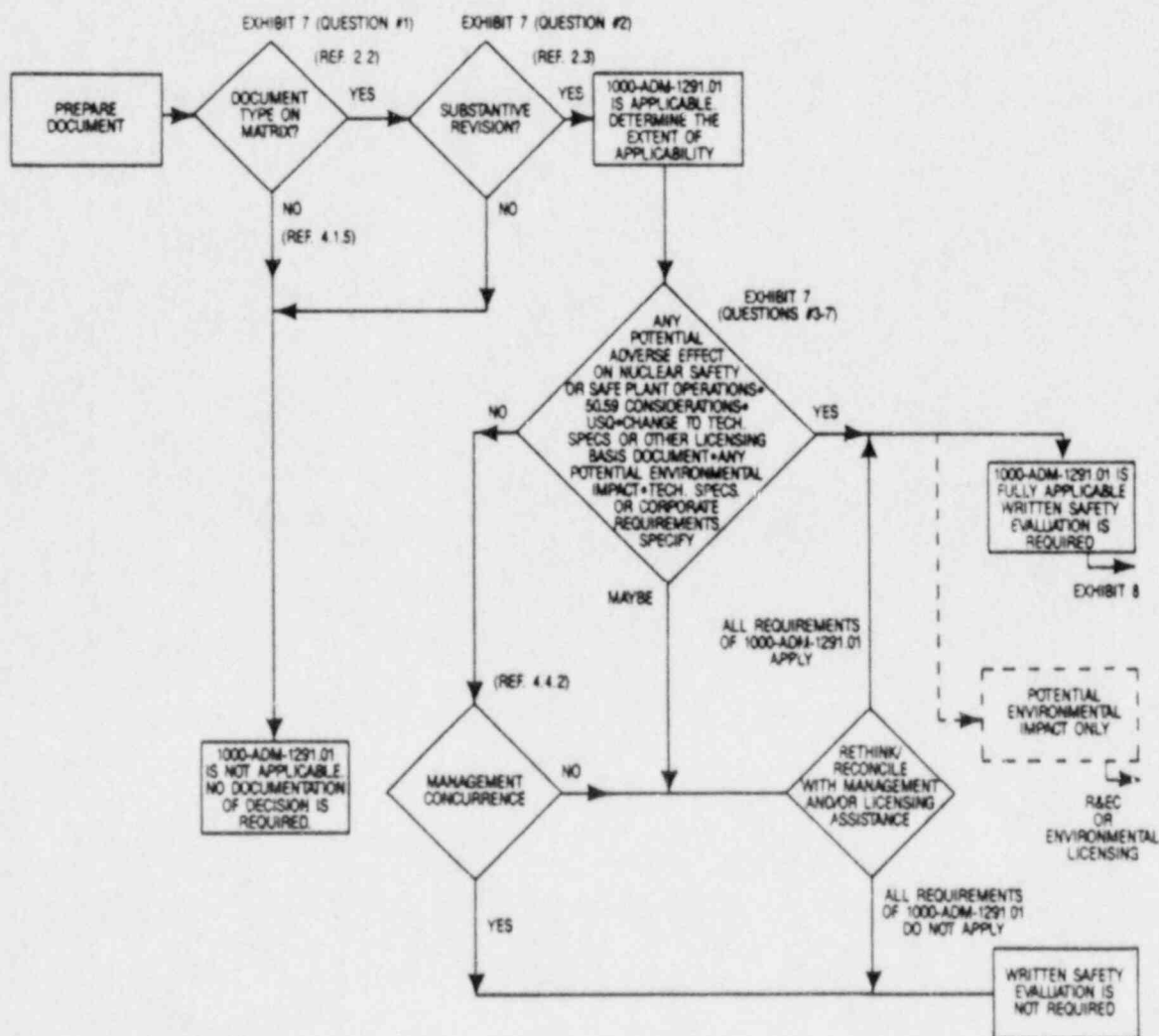
- (1) No specific product.
- (2) Review Coordinator - is responsible to initiate or identify issues of potential safety significance and forward appropriate data to the assigned review organization and ensure that the resulting review is documented, returned and filed.
- (3) Reviewer - is responsible for the Technical Review or Independent Safety Review of assigned reviews.

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Exhibit 3

Determination of the Extent of Applicability of 1000-ADM-1291.01

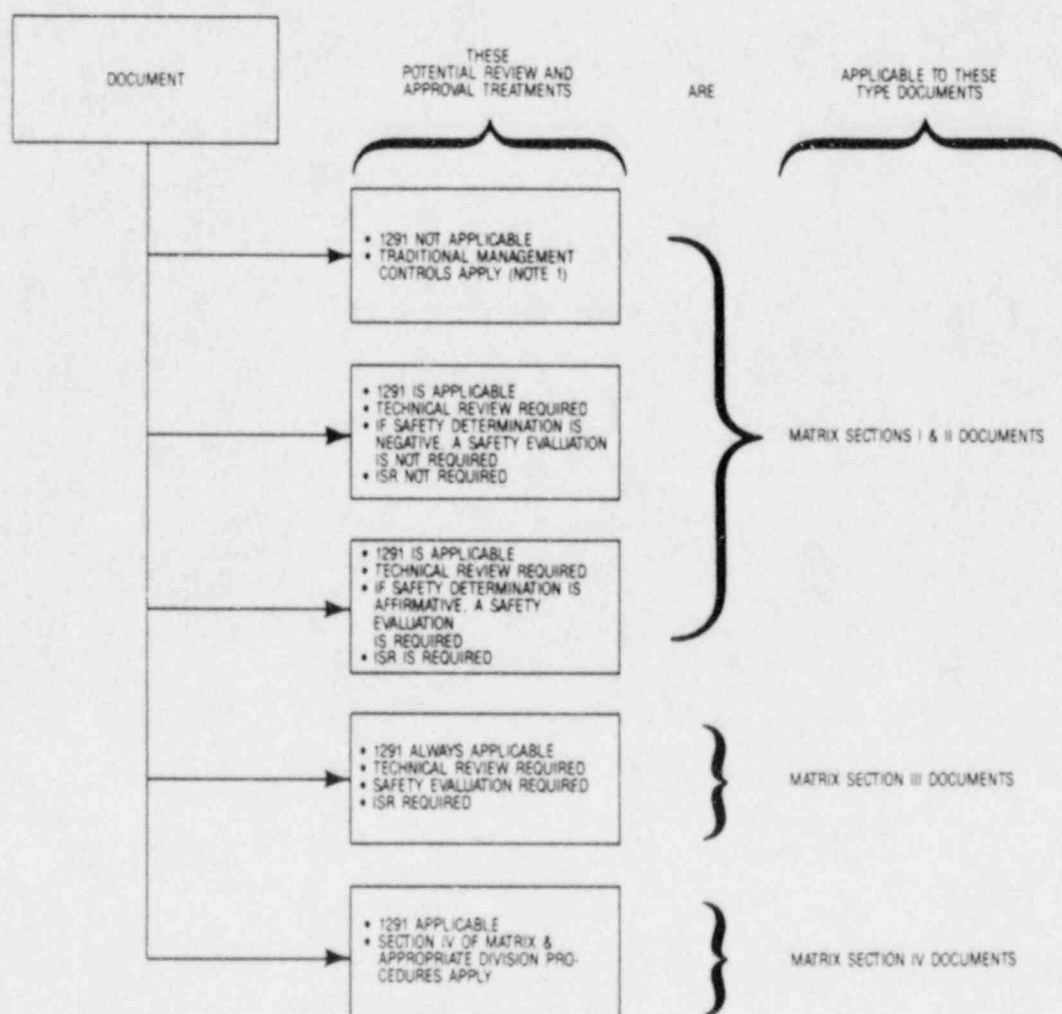


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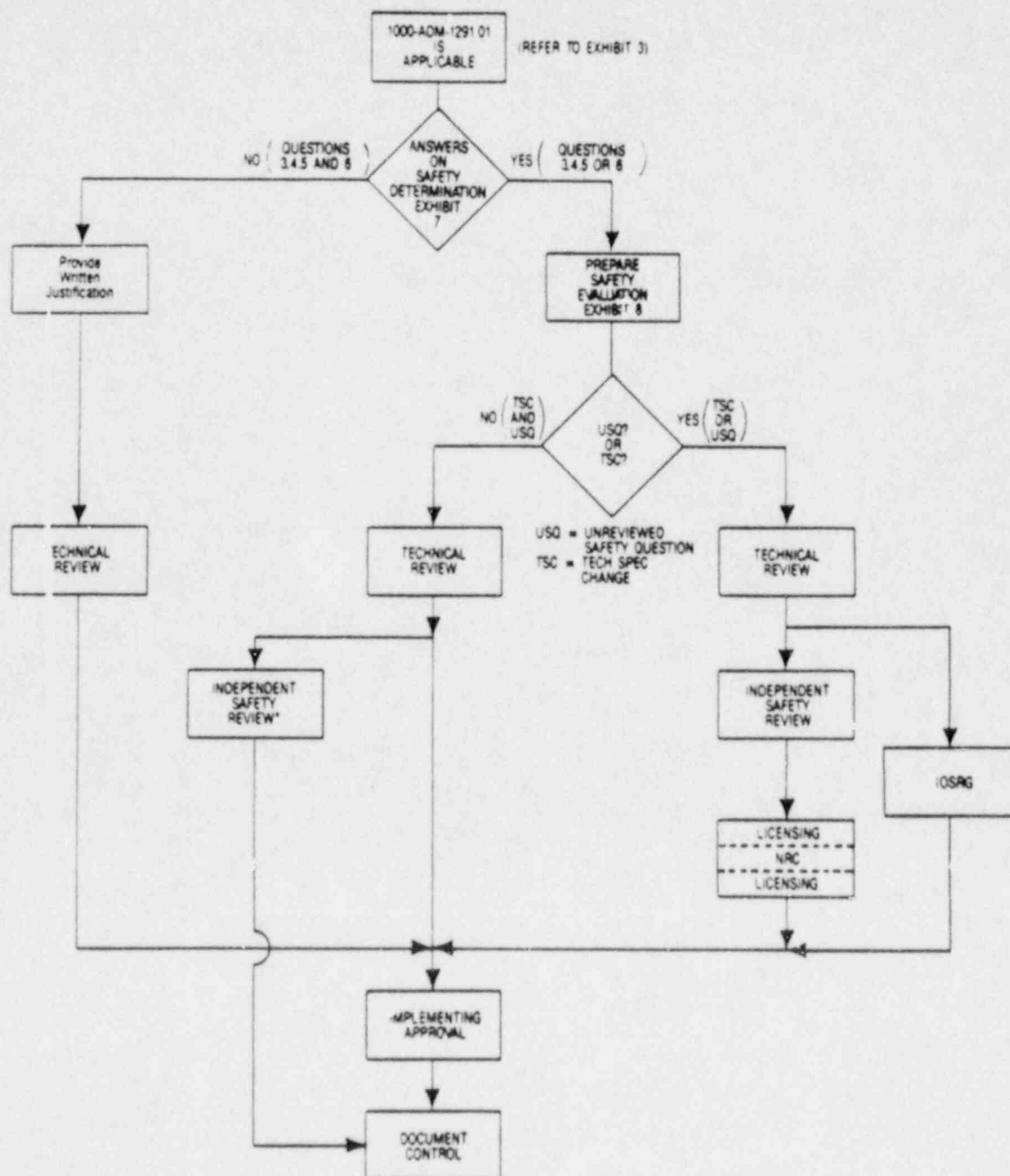
Revision No.
1

EXHIBIT 4

Summary of Safety Review Process Alternatives



NOTES: 1. This review and approval treatment applies to all documents not listed on the matrices.

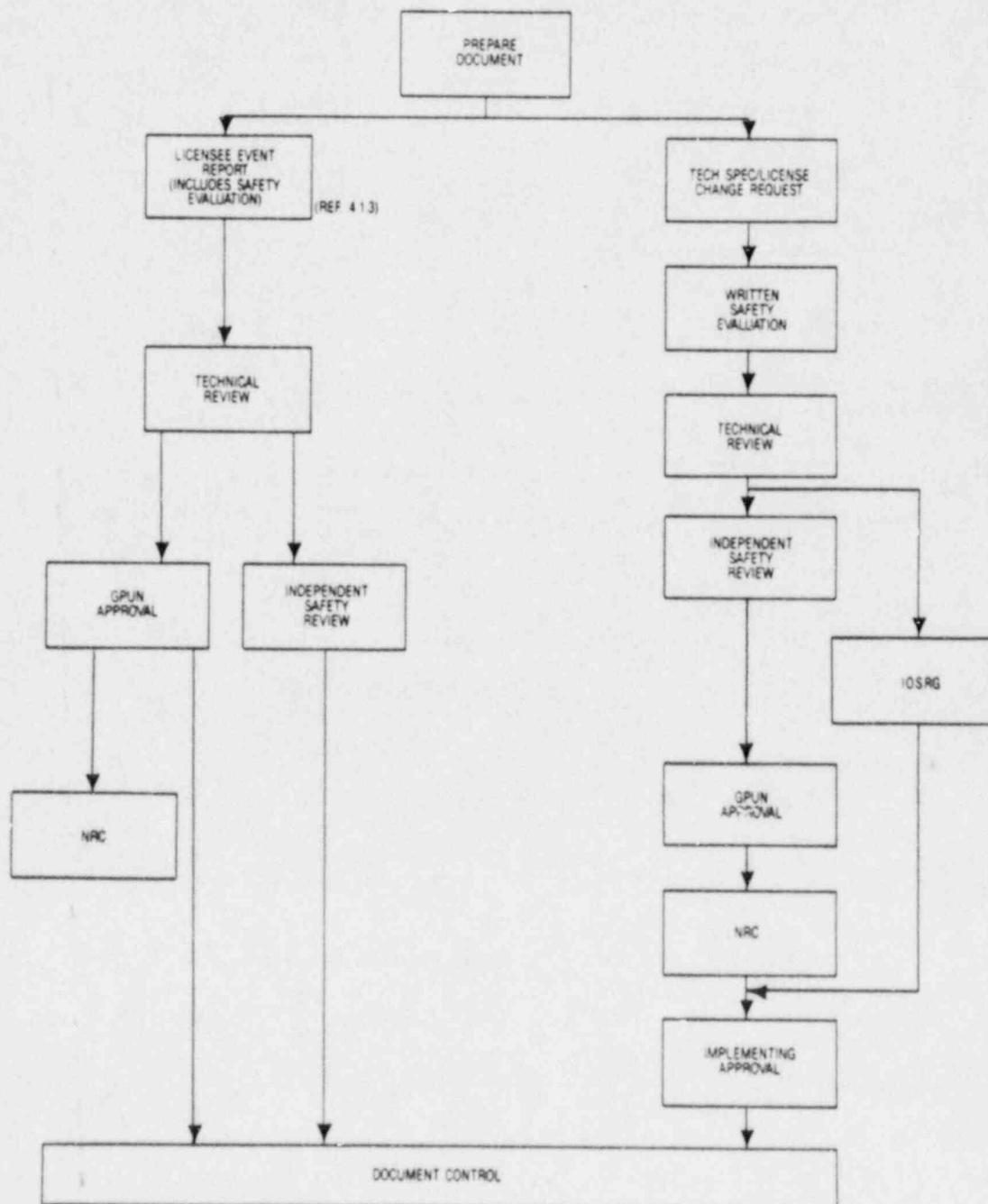
EXHIBIT 5
Flow Chart for Matrix Sections I and II Documents


*This review is mandatory, but is not required before implementing approval. Consult division procedures.

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EXHIBIT 6
Flow Chart for Matrix Section III Documents



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3EXHIBIT 7**GPU Nuclear**

SAFETY/ENVIRONMENTAL DETERMINATION AND 50.59 REVIEW

Division/Unit	Doc. No.	Rev. No.
Document Title		

This Determination form (or equivalent) is required for all documents in Sections I and II of the Matrices in Corporate Procedure 1000-ADM-1291.01:

1. Is this document type listed on the Matrix? ☐ Yes ☐ No
If the answer to question 1 is yes, proceed to answer question 2. If the answer to question 1 is no, then Procedure 1000-ADM-1291.01 is not applicable. No documentation is required. Refer to Section 4.1.5 for further information and guidance.
 2. Is this a substantive revision to the document? For examples of non-substantive revisions, refer to Section 2.3. A new document is considered to be equivalent to a substantive revision. ☐ Yes ☐ No
If the answer to question 2 is yes, then Procedure 1000-ADM-1291.01 is applicable. Proceed to answer questions 3 through 7 to determine the extent of procedure applicability and to assess the need for a written safety evaluation. If the answer to question 2 is no, then Procedure 1000-ADM-1291.01 is not applicable and documentation of this decision is not required.
 3. Does this document or change have the potential to adversely affect nuclear safety or safe plant operations? Refer to Section 4.2. ☐ Yes ☐ No

 4. Does the document or change require revision of the system/component description in the FSAR or otherwise require revision of the Technical Specifications or any other Licensing Basis Document? ☐ Yes ☐ No

 5. Does the document or change require revision of any procedural or operating description in the FSAR, or otherwise require revision of the Technical Specifications or any other Licensing Basis Document? ☐ Yes ☐ No

 6. Are tests or experiments conducted which are not described in the FSAR, the Technical Specifications, or any other Licensing Basis Document? ☐ Yes ☐ No

 7. Does this document involve any potential environmental impact? Refer to Section 3.4. ☐ Yes ☐ No
(If yes, or if in doubt, forward the document to Quality and Radiological Controls Division or to Environmental Licensing for detailed evaluation).
- * If any of the answers to questions 3, 4, 5, OR 6 are yes, proceed to EXHIBIT 8 and prepare a written safety evaluation. If the answers to 3, 4, 5, AND 6 are no, this precludes the occurrence of an Unreviewed Safety Question or Technical Specifications change. Provide written statements which support the determination that no unreviewed Safety Question or Technical Specification change is involved. These written statements shall provide justification for the "no" answers to question 3, 4, 5 and 6. Use the space provided for each question and attach additional sheets, if necessary.

Signatures	Dates
Preparer	
Section Manager	
Responsible Technical Reviewer	
Other Reviewer(s)	

N62245 (06-87)

Title	Procedure for Nuclear Safety and Environmental Impact Review and Approval of Documents	Revision No. 3
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EXHIBIT 8

SAFETY EVALUATION

Division/Unit	Doc. No.	Rev. No.
Document Title		

The purpose of this Safety Evaluation is to provide the basis for determining whether this document or change involves an Unreviewed Safety Question, a change to the Technical Specifications or an impact on nuclear safety.

The following questions must be answered, and reason(s) for each answer must be provided. A simple statement of conclusion in itself is not sufficient. The scope and depth of each reason should be commensurate with the safety significance and complexity of the proposed change.

1. Is the margin of safety as defined in Licensing Basis Documents other than the Technical Specifications reduced?
☐ Yes ☐ No
2. Will implementation of the document adversely affect nuclear safety?
☐ Yes ☐ No

The following questions comprise the 50.59 considerations and evaluation to determine if an Unreviewed Safety Question exists or if any change to the Technical Specifications is required:

3. Is the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the Safety Analysis Report increased?
☐ Yes ☐ No
4. Is the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report created?
☐ Yes ☐ No
5. Is the margin of safety as defined in the basis for any Technical Specification reduced?
☐ Yes ☐ No
6. Is a Technical Specifications change, or a change to any other Licensing Basis Document required?
☐ Yes ☐ No

Reasons for answers above (This constitutes a written safety evaluation. Use additional sheets if necessary):

If unsure of answer or if a "no" answer is not fully justifiable, then the answer must be checked "yes". If any answer above is "yes", an impact on nuclear safety or an Unreviewed Safety Question exists, or a Technical Specifications change is required. Revise or redesign, or forward to Licensing with any additional documentation to support a request for NRC approval prior to implementing approval (e.g., Technical Specification or other Licensing Basis Document change requests).

Signatures	Dates
Preparer	
Section Manager	
Responsible Technical Reviewer	
Independent Safety Reviewer	
Other Reviewer(s)	

N62244 (03-87)

Title Procedure for Nuclear Safety and Environmental Impact
Review and Approval of DocumentsRevision No.
1EXHIBIT 9

GPU Nuclear		INITIAL CERTIFICATION FORM	
Responsible Technical Reviewer/Independent Safety Reviewer			
NAME	Last	First	Initial
			Employee No.
DEPARTMENT / LOCATION			DATE FORM COMPLETED
Qualification Requirements:			
Responsible Technical Reviewer (RTR)			
Individuals shall meet or exceed the qualifications of AHSUANS-3.1-1978 (N18.1-1978) Section 4.4 for Reactor Engineering, Instrumentation and Control, Chemistry and Radiochemistry, Radiation Protection and Quality Assurance reviewers or have seven (7) years of appropriate experience in their specialty. All others shall have a Bachelor's Degree in Engineering or the Physical Sciences and three years nuclear power experience or else shall have seven (7) years of appropriate experience in their specialty. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two (2) years.			
Independent Safety Reviewer (ISR)			
Individuals shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the area being reviewed or have nine (9) years of appropriate experience in their specialty. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two (2) years.			
A. Summary of Qualifications:			
1. Bachelor's Degree <input type="checkbox"/> Yes <input type="checkbox"/> No Major _____			
Graduate Degree <input type="checkbox"/> Yes <input type="checkbox"/> No Major _____			
2. Technical Experience			
A technical experience summary containing the following information must be attached to this form:			
Description of Experience Type (nuclear or non-nuclear) Applicability (BWR, PWR, or both) Dates (from-to)			
B. Training Requirements:			
1 General Safety Review Process Training Complete _____ Date/Location			
2 Divisional Safety Review Process Training Complete _____ (if required) Date/Location			
_____ Signature of Employee		_____ Date	
RTR ()		OC()	TMR-1()
ISR ()		OC()	TMR-1()
I have reviewed the above qualifications and certify that the above individual is a qualified reviewer as noted.			
_____ * Signature of Certifier		_____ Title	_____ Date
* Certifier must be immediate supervisor or above			