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BYR 2000-060
P.C. No. 266

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
- (a) License No. DPR-3 (Docket No. 50-29)
 - (b) Letter, P.M. Ray (NRC) to M. Atkins (YAEC), NYR 2000-044, "Yankee Nuclear Power Station – Issuance of Amendment to Revise Technical Specifications Related to the Quality Assurance Program (TAC No. MA5032)," dated June 20, 2000
 - (c) Letter, P.M. Ray (NRC) to M. Atkins (YAEC), NYR 2000-045, "Yankee Nuclear Power Station – Quality Assurance Program Changes (TAC No. MA5032)," dated June 20, 2000
 - (d) Yankee Decommissioning Quality Assurance Program, Revision 30, August, 2000
 - (e) NUREG-1431, Revision 1, "Standard Technical Specifications – Westinghouse Plants," April 1995
 - (f) NUREG-1432, Revision 1, "Standard Technical Specifications – Combustion Engineering Plants," April 1995
 - (g) NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995

Subject: Request for Transfer of Certain Administrative Requirements from Yankee Nuclear Power Station's Defueled Technical Specifications to the Yankee Decommissioning Quality Assurance Program

Pursuant to 10 CFR Section 50.90 of the Commission's Rules and Regulations, Yankee Atomic Electric Company (YAEC) requests Nuclear Regulatory Commission (NRC) review and

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approval of a modification to Appendix A of the Yankee Nuclear Power Station (YNPS) Possession Only License (POL).

PROPOSED CHANGES

YAEC proposes that Section 6.5 "Review and Audit", Section 6.7 "Procedures and Programs" and Section 6.9 "Record Retention" be removed from the YNPS Technical Specifications (TS), and transferred verbatim to the Yankee Decommissioning Quality Assurance Program (YDQAP). An annotated version of the present TS pages showing the proposed changes is provided in Attachment I. The proposed new pages of the YNPS TS are given in Attachment II. The aforementioned administrative language was incorporated in Revision 30 of the YDQAP as Appendix D and is provided in Attachment III.

An editorial change has also been made to the last sentence of Bases Section B3/4.2 to replace an obsolete reference to PORC with Independent Safety Reviewer (ISR) and to indicate that the ISR performs a review function whereas the approval is provided by the Decommissioning Manager or designee. The Independent Safety Review process replaced PORC in an earlier amendment (Reference (b)). Lastly, an editorial change has been made to Sections 6.12.1.b and 6.13.1.b to add the phrase "or a designee" following Decommissioning Manager. This operational flexibility was intended to be included with an earlier amendment (Reference (b)) and is consistent with existing terminology such as that used in Sections 6.5.1.b, 6.5.2.e.1 and 6.5.2.e.2.

REASON AND BASIS FOR CHANGE

The proposal to remove the description of the activities and the responsibilities of Section 6.5 "Review and Audit" from the TS and subsequent transfer of that deleted text to the YDQAP is consistent with the treatment of this issue in NUREG-1431 (Reference (e)) and NUREG-1432 (Reference (f)). This change merely involves the relocation of administrative requirements from one controlled licensing document to another controlled licensing document.

The reason and basis for the proposed deletion of Section 6.7 "Procedures and Programs," and Section 6.9 "Record Retention," and the transfer of the TS requirements contained therein to the YDQAP is as follows:

10 CFR 50.36(c)(6) of the Commission's regulations states that the content of Technical Specifications relating to administrative controls for nuclear power reactor facilities that have submitted the certifications required by § 50.82(a)(1) "will be developed on a case-by-case basis." YNPS is currently in an advanced state of decommissioning with the result that the scope and complexity of activities at the site have been greatly reduced. To ensure that the remaining work can be completed in the safest and most efficient manner possible, it is important to eliminate any unnecessary and/or duplicative administrative requirements and locate the remaining germane administrative requirements in the appropriate licensing document. We believe that the requirements currently in Sections 6.7 and 6.9 of the YNPS TS duplicate, at least in part, requirements contained within the YDQAP. Specifically, we believe that there is

significant duplication between the requirements of Sections 6.7 and 6.9 of the YNPS TS and requirements currently in Sections II, III, and XVII of the YDQAP. In order to provide absolute assurance that every element of Sections 6.7 and 6.9 of the YNPS TS is addressed by the YDQAP, these requirements will be transferred unmodified into the YDQAP as Appendix D. Subsequent to this transfer, any future changes to the YDQAP, and of course, the new Appendix D, will be subject to a review conducted in accordance with the requirements of 10 CFR 50.54(a).

On July 22, 1993, the Commission issued its Final Policy Statement on Technical Specification Improvements, "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (58 FR 39132). In this policy statement, the Commission noted that in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the Technical Specifications, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Board in Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In this proceeding, the Appeal Board observed:

There is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

We believe that the proposed transfer of the requirements of YNPS TS Sections 6.5, 6.7 and 6.9 to the YDQAP is completely consistent with the Commission Policy cited above. Likewise, we believe that the proposed action is completely consistent with the content of NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance" (Reference (g)).

SIGNIFICANT HAZARDS CONSIDERATION

The proposed changes are administrative in nature. Administrative requirements in Sections 6.5, 6.7 and 6.9 of the YNPS TS are to be transferred to the YDQAP, which, in part, is the current location of related administrative requirements. As such, the changes will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. The administrative nature of the changes will not affect any important to safety systems or components or their mode of operation. Relocation of TS administrative Sections 6.5, 6.7 and 6.9 to the YDQAP does not result in changes to either system design or operating strategies. Relocation of these administrative requirements to the YDQAP has no affect on accident initiators or mitigation.

Therefore, the proposed administrative changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different accident from any previously evaluated. The proposed changes do not modify plant operation, systems, or components. Relocation of TS administrative Sections 6.5, 6.7 and 6.9 to the YDQAP does not affect any of the parameters or conditions that could contribute to the initiation of any accident. No new accident scenarios are created as a result of relocating the aforementioned administrative requirements to the YDQAP. In addition, no important to safety equipment or functions are altered as a result of this proposed change. Therefore, the proposed administrative changes will not create the possibility of a new or different accident from any previously evaluated.
3. Involve a significant reduction in the margin of safety. The changes are administrative in nature involving the relocation of administrative requirements from one licensing document to another licensing document currently containing related requirements. Relocation of TS administrative Sections 6.5, 6.7 and 6.9 to the YDQAP does not affect plant operation, systems, or components. The proposed administrative changes do not represent a change in initial conditions, system response time, or in any other parameter affecting the course of an accident analysis supporting the Bases of any Technical Specification. Therefore, the proposed administrative changes will not involve a significant reduction in the margin of safety.

Based on the considerations noted above, it is concluded that the proposed changes will not endanger the public health and safety.

ENVIRONMENTAL IMPACT DETERMINATION

This amendment request meets the criteria specified in 10 CFR 51.22 (c)(9) for categorical exclusion or otherwise not requiring environmental review. Specific criteria contained in this section of the regulations are discussed below:

1. The amendment involves no significant hazards consideration. As demonstrated above, this requested amendment does not involve any significant hazards considerations.
2. There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The amendment deals solely with administrative issues.
3. There is no significant increase in individual or cumulative occupational radiation exposure. Again, the proposed amendment deals solely with administrative issues completely unrelated to individual or cumulative occupational radiation exposure.

Based on the foregoing, it is concluded that the proposed amendment meets the criteria for categorical exclusion set forth in 10 CFR 51.22 (c)(9) and therefore, no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

ISR AND IRAC REVIEW

The proposed changes, which have received an Independent Safety Review (ISR) as well as a review by the Independent Review and Audit Committee (IRAC), have been determined to be appropriate.

SCHEDULE OF CHANGE

The proposed changes will be implemented upon approval by the Commission.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



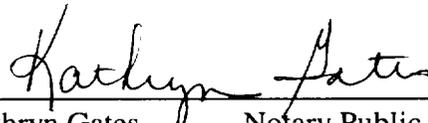
Kenneth J. Heider
Vice President Operations and Decommissioning

Attachments

C: P. Ray, USNRC, Project Manager
R.B. Bellamy, USNRC, Region I

COMMONWEALTH OF MASSACHUSETTS
WORCESTER COUNTY

Then personally appeared before me, Kenneth J. Heider, who, being duly sworn, did state that he is Vice President of Operations and Decommissioning at Yankee Atomic Electric Company, that he is duly authorized to execute and file the foregoing document in the name and on behalf of Yankee Atomic Electric Company, and that the statements therein are true to the best of his knowledge and belief.



Kathryn Gates Notary Public
My Commission Expires January 1, 2004

ATTACHMENT I

Revised Technical Specification Pages

Annotated Version

B3/4-4

6-5 through 6-10

6-13 through 6-16

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6-19

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6-22

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3/4.2 CRANE TRAVEL - SPENT FUEL PIT

BASES

The restriction on movement of loads in excess of the nominal weight of a fuel assembly over fuel assemblies in the spent fuel pit ensures that in the event this load is dropped (1) the activity release will be limited to that contained in a single fuel assembly, and (2) any possible distortion of the fuel in the storage racks will not result in a critical array. This assumption is consistent with the activity release assumed in the accident analysis.

Handling of the present Spent Fuel Storage Building roof hatches under administrative control will assure safe handling of the roof hatches. The restriction of movement of the spent fuel inspection stand, the spent fuel assembly nondestructive test equipment, the cask hatch cover, the volume reduction equipment, the shipping cask liners over spent fuel ensures that these items cannot be dropped on spent fuel. Dropping any one of these items from its maximum height will not result in loss of integrity of the spent fuel pit floor. Handling of the fuel handling equipment for infrequent maintenance under administrative control will ensure the safe handling of any fuel handling components.

The use of a single-failure-proof crane provides assurance that a credible single failure will not result in the shipping and/or transfer cask, the cask set-down pad, the cask hatch cover, and the cask components and associated lifting devices having an adverse effect on the spent fuel pit or the irradiated fuel in the spent fuel pit. The restriction on movement of the shipping and/or transfer cask, the cask set-down pad, the cask hatch cover, and the cask components and lifting devices further ensures that these items cannot be dropped on spent fuel in the spent fuel pit storage racks. The use of a single-failure-proof crane ensures that the cask hatch cover and the cask components and associated lifting devices, which are permitted over the spent fuel in the cask, cannot be dropped on the spent fuel. The safe load path is established to support the defense-in-depth approach to safety concerning heavy loads over the spent fuel pit. Deviations from or changes to the safe load path shall be performed in accordance with approved written procedures which have been ~~approved~~-reviewed by ~~PORC~~ an Independent Safety Reviewer and approved by the Decommissioning Manager or designee.

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.3 FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility management/supervisory staff shall meet or exceed the minimum qualifications of ANSI 18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall also meet the minimum qualifications of Regulatory Guide 1.8, Revision 1.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the facility Certified Fuel Handlers shall be conducted in accordance with an NRC approved training program. A training program for the unit staff shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971.

~~6.5 REVIEW AND AUDIT~~

~~6.5.1 Independent Safety Review~~

~~An Independent Safety Review shall be a thorough review conducted by one or more qualified Independent Safety Reviewers. Persons performing these reviews shall be knowledgeable in the subject area being reviewed. Independent Safety Reviews must be completed prior to implementation of proposed activities.~~

~~a. Independent Safety Reviewers shall be individuals without direct responsibility for the performance of the activities under review; these reviewers may be from the same functionally cognizant organization as the individual or group performing the original work.~~

~~b. Independent Safety Reviewers shall have at least 5 years of professional experience and either a Bachelor's Degree in Engineering or the Physical Sciences or shall have equivalent qualifications in accordance with ANSI 18.1-1971. The Decommissioning Manager (or a designee) shall document the appointment of Independent Safety Reviewers.~~

~~c. The following subjects shall be independently reviewed by a qualified Independent Safety Reviewer:~~

~~1. safety evaluations for changes in the facility as described in the Final Safety Analysis Report (FSAR), changes in procedures as described in the FSAR, and tests or experiments not described in the FSAR to verify that such actions do not involve a change to the Technical~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

~~Specifications or will not involve an unreviewed safety question as defined in 10CFR50.59;~~

~~2. proposed changes to the programs required by Technical Specification 6.7, to verify that such changes do not involve a change to the Technical Specifications and will not involve an unreviewed safety question as defined in 10CFR50.59; and~~

~~3. proposed changes to the Technical Specification Bases.~~

~~6.5.2 Independent Review and Audit Committee (IRAC)~~

~~The IRAC is responsible for reviewing, auditing, and advising the President of Yankee Atomic Electric Company (or a designee) on matters related to the safe storage of irradiated fuel. This review and audit function is independent of line organization responsibilities.~~

~~a. The IRAC shall include a minimum of five members. Alternates may be substituted for regular members. The licensee shall designate in writing the chairman, the members, and alternates for the IRAC. The chairman shall not have management responsibilities for, or report to, the line organizations responsible for operation or maintenance of the fuel storage facility.~~

~~b. The IRAC shall collectively have experience and knowledge in the following functional areas:~~

- ~~1. fuel handling and storage (including the potential for criticality);~~
- ~~2. chemistry and radiochemistry;~~
- ~~3. engineering;~~
- ~~4. radiation protection; and~~
- ~~5. quality assurance.~~

~~If necessary, individuals with knowledge and experience in other functional areas may be utilized to provide advice to the IRAC.~~

~~c. The IRAC shall hold at least one meeting per quarter.~~

~~d. A quorum shall consist of three regular members or their duly appointed alternates. These members representing the line organizations responsible for the operation and maintenance of the facility shall not constitute a majority of the~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

~~quorum. At least one member of the quorum shall be the chairman or the chairman's designated alternate.~~

~~e. As a minimum, the IRAC shall perform the following functions:~~

- ~~1. advise the Decommissioning Manager (or a designee) on all matters related to safe storage of irradiated fuel;~~
- ~~2. advise the management of the audited organization and the Decommissioning Manager (or a designee) of audit results as they relate to safe storage of irradiated fuel;~~
- ~~3. recommend to the management of the audited organization, and its management, any corrective action to improve the safe storage of irradiated fuel; and~~
- ~~4. notify the President of Yankee Atomic Electric Company (or a designee) of any safety significant disagreement between the IRAC and the Decommissioning Manager within 24 hours.~~

~~f. The IRAC shall be responsible for reviewing:~~

- ~~1. the safety evaluations for procedures, and changes thereto, completed under the provisions of 10 CFR 50.59 to verify that such actions do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after implementation of the affected procedure;~~
- ~~2. changes to structures, systems, or components important to the safe storage of irradiated fuel to verify that such changes do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after implementation of the change;~~
- ~~3. tests or experiments involving the safe storage of irradiated fuel to verify that such tests or experiments do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after performance of the test or experiment;~~
- ~~4. proposed changes to the YNPS Technical Specifications of the license;~~
- ~~5. violations of codes, regulations, orders, license requirements, or internal procedures/instructions having nuclear safety significance;~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

- ~~6. indications of unanticipated deficiencies in any aspect of design or operation of structures, systems, or components that could affect safe storage of irradiated fuel;~~
- ~~7. significant accidental, unplanned, or uncontrolled radioactive releases, including corrective action(s) to prevent recurrence;~~
- ~~8. significant operating abnormalities or deviations from normal and expected performance of equipment that affect safe storage of irradiated fuel;~~
- ~~9. the performance of the corrective action system; and~~
- ~~10. internal and external experience information related to the safe storage of irradiated fuel that may indicate areas for improving facility safety.~~

~~Reports or records of these reviews shall be forwarded to the Decommissioning Manager within 30 days after completion of the review.~~

~~g. The TRAC's audit responsibilities shall encompass:~~

- ~~1. conformance of irradiated fuel storage to provisions contained within the YNPS Technical Specifications and applicable license conditions at least once per 12 months;~~
- ~~2. the training and qualifications of facility staff at least once per 12 months;~~
- ~~3. implementation of all programs required by YNPS Technical Specification 6.7 at least once per 24 months;~~
- ~~4. actions taken to correct deficiencies occurring in structures, systems, components, or methods of operation that affect safe storage of irradiated fuel at least once per 6 months;~~
- ~~5. facility operations, modifications, maintenance, and surveillance related to the safe storage of irradiated fuel to verify independently that these activities are performed safely and correctly at least once per 24 months; and~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

~~6.5.2.3 Other activities and documents as requested by the Decommissioning Manager (or a designee).~~

~~Reports of records of these audits, including any recommendations for improving the safe storage of irradiated fuel, shall be forwarded to the Decommissioning Manager (or a designee) within 30 days after completion of the audit.~~

6.5.3 Records

~~Written records of reviews and audits shall be maintained. As a minimum, these records shall include:~~

- ~~a. Results of the activities conducted under the provisions of Specifications 6.5.1 and 6.5.2;~~
- ~~b. Recommendations to the management of the audited organization;~~
- ~~c. An assessment of the safety significance of review or audit findings;~~
- ~~d. Documentation of reviews conducted under Specification 6.5.1.c; and~~
- ~~e. Determination of whether each item considered under Specifications 6.5.2.f.1 through 6.5.2.f.3 involves an unreviewed safety question as defined in 10CFR50.59.~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

~~Pages 6-10 through 6-12 have been deleted.~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by an Independent Safety Reviewer and the results of this review shall be submitted to the Independent Review and Audit Committee (IRAC) and the Decommissioning Manager.

~~6.7 PROCEDURES AND PROGRAMS~~

~~6.7.1 Written procedures shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.2 through 5.2.9 and 5.3 of ANSI N18.7-1972 and Appendix "A" of Regulatory Guide 1.33, Revision 2, except as provided in 6.7.2 and 6.7.3 below. The written procedures shall also cover the activities relating to:~~

- ~~a. Fire Protection Program implementation.~~
- ~~b. PROCESS CONTROL PROGRAM implementation.~~
- ~~c. OFF-SITE DOSE CALCULATION MANUAL implementation.~~
- ~~d. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.~~

~~6.7.2 Each procedure and administrative policy of 6.7.1 above, and changes thereto, shall be reviewed by an Independent Safety Reviewer and approved by the Decommissioning Manager prior to implementation and reviewed periodically as set forth in administrative procedures.~~

~~6.7.3 Deleted.~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

~~6.7.4-----Temporary changes to procedures of 6.7.1 above may be made provided:~~

~~a.---The intent of the original procedure is not altered.~~

~~b.---The change is approved by two members of the plant management staff, at least one of whom is a Certified Fuel Handler.~~

~~c.---The change is documented and approved by the Decommissioning Manager within 14 days of implementation.~~

~~6.7.5-----The following programs shall be established, implemented, and maintained:~~

~~a.---Radioactive Effluent Controls Program~~

~~A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:~~

~~1)-----Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;~~

~~2)-----Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR, Part 20, Appendix B, Table 1, Column 2;~~

~~3)-----Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM;~~

~~4)-----Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

~~From each unit to UNRESTRICTED AREAS conforming to Appendix 1 to 10 CFR, Part 50.~~

- ~~5)-----Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days.~~
- ~~6)-----Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2% of the guidelines for the annual dose or dose commitment conforming to Appendix 1 to 10 CFR, Part 50.~~
- ~~7)-----Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR, Part 20, Appendix B, Table 11, Column 1.~~
- ~~8)-----Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix 1 to 10 CFR, Part 50.~~
- ~~9)-----Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, Tritium, and all radionuclides in particulate form with half-lives greater than eight days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix 1 to 10 CFR, Part 50.~~
- ~~10)-----Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR, Part 190.~~

~~b)-----Radological Environmental Monitoring Program~~

~~A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

~~shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the Effluent Monitoring Program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR, Part 50, and (3) include the following:~~

- ~~1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM;~~
- ~~2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census; and~~
- ~~3) Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the Quality Assurance Program for environmental monitoring.~~

6.8 REPORTING REQUIREMENTS

The following identified reports shall be submitted pursuant to 10 CFR 50.4. The reporting requirements of 6.8.1, 6.8.2 and 6.8.3 are in accordance with Revision 4 of Regulatory Guide 1.16, "Reporting of Operating Information - Appendix A Technical Specifications."

- 6.8.1 Annual Report Annual reports covering the activities of the unit as described below for the previous year shall be submitted prior to March 1 of each year.

Reports required on an annual basis shall include

- a. A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, (a) e.g., operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), and waste processing.

6.0 ADMINISTRATIVE CONTROLS (Continued)

- a. Sealed Source leakage in excess of limits, Specification 3.5.

~~6.9 RECORD RETENTION~~

~~6.9.1-----The following records shall be retained for at least 5 years--~~

- ~~a---Records and logs of facility operation covering time interval at each power level--~~
- ~~b---Records and logs of principal maintenance activities, inspection, repair and replacement of principal items of equipment related to nuclear safety--~~
- ~~c---All REPORTABLE EVENT reports submitted to the Commission--~~
- ~~d---Records of surveillance activities, inspections and calibrations required by these Technical Specifications--~~
- ~~e---Records of reactor tests and experiments--~~
- ~~f---Records of changes made to Operating Procedures--~~
- ~~g---Records of radioactive shipments--~~
- ~~h---Records of sealed source leak tests and results--~~
- ~~i---Records of annual physical inventory of all sealed source material of record--~~

~~6.9.2-----The following records shall be retained for the duration of the Possession Only License--~~

- ~~a---Records and drawing changes reflecting facility design modifications made to systems and equipment described in the FSAR--~~
- ~~b---Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories--~~
- ~~c---Records of facility radiation and contamination surveys--~~
- ~~d---Records of radiation exposure for all individuals entering radiation control areas--~~
- ~~e---Records of gaseous and liquid radioactive material released to the environs--~~

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.9.2--(continued)

- ~~f---Records-of-transient-or-operational-cycles-for-the-Reactor Pressure-Vessel-~~
- ~~g---Records-of-training-and-qualification-for-current-members of-the-plant-staff-~~
- ~~h---Records-of-inservice-inspections-performed-pursuant-to Technical-Specifications-~~
- ~~i---Records-of-Quality-Assurance-activities-required-by-the-QA manual-~~
- ~~j---Records-of-reviews-performed-for-changes-made-to procedures-or-equipment-or-reviews-of-tests-and experiments-pursuant-to-10-CFR-50.59-~~
- ~~k---Records-of-Independent-Safety-Reviews-and-the-IRAC meetings,-and-Records-of-the-Plant-Operational-Review Committee-(PORC)-and-the-Nuclear-Safety-Audit-and-Review Committee-(NSARC)-the-review-and-audit-functions-which preceded-the-Independent-Safety-Review-function-and-IRAC-~~
- ~~l---Records-for-Environmental-Qualification-~~
- ~~m---Records-of-analysis-required-by-the-Radiological Environmental-Monitoring-Program-~~
- ~~n---Records-of-the-service-lives-of-all-snubbers,-including the-date-at-which-the-service-life-commences-and associated-installation-and-maintenance-records-~~
- ~~o---Records-of-reviews-performed-for-changes-made-to-the-OFF-SITE-DOSE-CALCULATION-MANUAL-and-the-PROCESS-CONTROL PROGRAM-~~

6.10 RADIATION PROTECTION PROGRAM

- 6.10.1 Procedures for personnel radiation protection shall be prepared consistent with requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposures

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.12 PROCESS CONTROL PROGRAM (PCP)

6.12.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as ~~required by Specification 6-9-2-e~~ specified by YDQAP Appendix D (Record Retention). This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s), and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of federal, state, or other applicable regulations.
- b. Shall become effective after review and acceptance by an Independent Safety Reviewer and the approval of the Decommissioning Manager (or a designee).

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.13 OFF-SITE DOSE CALCULATION MANUAL (ODCM)

6.13.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as ~~required by Specification 6.9.2.0.~~ specified by YDQAP Appendix D (Record Retention). This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s), and
 - 2) A determination that the change will maintain the level of the radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by an Independent Safety Reviewer and the approval of the Decommissioning Manager (or a designee).
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

ATTACHMENT II

Revised Technical Specification Pages

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3/4.2 CRANE TRAVEL - SPENT FUEL PIT

BASES

The restriction on movement of loads in excess of the nominal weight of a fuel assembly over fuel assemblies in the spent fuel pit ensures that in the event this load is dropped (1) the activity release will be limited to that contained in a single fuel assembly, and (2) any possible distortion of the fuel in the storage racks will not result in a critical array. This assumption is consistent with the activity release assumed in the accident analysis.

Handling of the present Spent Fuel Storage Building roof hatches under administrative control will assure safe handling of the roof hatches. The restriction of movement of the spent fuel inspection stand, the spent fuel assembly nondestructive test equipment, the cask hatch cover, the volume reduction equipment, the shipping cask liners over spent fuel ensures that these items cannot be dropped on spent fuel. Dropping any one of these items from its maximum height will not result in loss of integrity of the spent fuel pit floor. Handling of the fuel handling equipment for infrequent maintenance under administrative control will ensure the safe handling of any fuel handling components.

The use of a single-failure-proof crane provides assurance that a credible single failure will not result in the shipping and/or transfer cask, the cask set-down pad, the cask hatch cover, and the cask components and associated lifting devices having an adverse effect on the spent fuel pit or the irradiated fuel in the spent fuel pit. The restriction on movement of the shipping and/or transfer cask, the cask set-down pad, the cask hatch cover, and the cask components and lifting devices further ensures that these items cannot be dropped on spent fuel in the spent fuel pit storage racks. The use of a single-failure-proof crane ensures that the cask hatch cover and the cask components and associated lifting devices, which are permitted over the spent fuel in the cask, cannot be dropped on the spent fuel. The safe load path is established to support the defense-in-depth approach to safety concerning heavy loads over the spent fuel pit. Deviations from or changes to the safe load path shall be performed in accordance with approved written procedures which have been reviewed by an Independent Safety Reviewer and approved by the Decommissioning Manager or designee.

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.3 FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility management/supervisory staff shall meet or exceed the minimum qualifications of ANSI 18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall also meet the minimum qualifications of Regulatory Guide 1.8, Revision 1.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the facility Certified Fuel Handlers shall be conducted in accordance with an NRC approved training program. A training program for the unit staff shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971.

6.5 DELETED

Pages 6-6 through 6-12 have been deleted.

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73, and
- b. Each REPORTABLE EVENT shall be reviewed by an Independent Safety Reviewer and the results of this review shall be submitted to the Independent Review and Audit Committee (IRAC) and the Decommissioning Manager.

6.7 DELETED

Pages 6-14 through 6-15 have been deleted.

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.8 REPORTING REQUIREMENTS

The following identified reports shall be submitted pursuant to 10 CFR 50.4. The reporting requirements of 6.8.1, 6.8.2 and 6.8.3 are in accordance with Revision 4 of Regulatory Guide 1.16, "Reporting of Operating Information - Appendix A Technical Specifications."

- 6.8.1 Annual Report Annual reports covering the activities of the unit as described below for the previous year shall be submitted prior to March 1 of each year.

Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, (a) e.g., operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), and waste processing.

6.0 ADMINISTRATIVE CONTROLS (Continued)

- a. Sealed Source leakage in excess of limits,
Specification 3.5.

6.9 DELETED

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.10 RADIATION PROTECTION PROGRAM

- 6.10.1 Procedures for personnel radiation protection shall be prepared consistent with requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposures.

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.12 PROCESS CONTROL PROGRAM (PCP)

6.12.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as specified by YDQAP Appendix D (Record Retention). This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s), and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of federal, state, or other applicable regulations.
- b. Shall become effective after review and acceptance by an Independent Safety Reviewer and the approval of the Decommissioning Manager (or a designee).

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.13 OFF-SITE DOSE CALCULATION MANUAL (ODCM)

6.13.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as specified by YDQAP Appendix D (Record Retention). This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s), and
 - 2) A determination that the change will maintain the level of the radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by an Independent Safety Reviewer and the approval of the Decommissioning Manager (or a designee).
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

ATTACHMENT III

Administrative Controls

The following text was included in Appendix D of the YDQAP.

Appendix D
Administrative Controls

Administrative controls are the written rules, orders, instructions, procedures, policies, practices, and the designation of authorities and responsibilities by the management to obtain assurance of safety and quality of maintenance of a nuclear facility. These controls shall be adhered to.

A. REVIEW AND AUDIT

1. Independent Safety Review

An Independent Safety Review shall be a thorough review conducted by one or more qualified Independent Safety Reviewers. Persons performing these reviews shall be knowledgeable in the subject area being reviewed. Independent Safety Reviews must be completed prior to implementation of proposed activities.

- a. Independent Safety Reviewers shall be individuals without direct responsibility for the performance of the activities under review; these reviewers may be from the same functionally cognizant organization as the individual or group performing the original work.
- b. Independent Safety Reviewers shall have at least 5 years of professional experience and either a Bachelor's Degree in Engineering or the Physical Sciences or shall have equivalent qualifications in accordance with ANSI 18.1-1971. The Decommissioning Manager (or a designee) shall document the appointment of Independent Safety Reviewers.
- c. The following subjects shall be independently reviewed by a qualified Independent Safety Reviewer:
 - Safety evaluations for changes in the facility as described in the Final Safety Analysis Report (FSAR), changes in procedures as described in the FSAR, and tests or experiments not described in the FSAR to verify that such actions do not involve a change to the Technical Specifications or will not involve an unreviewed safety question as defined in 10CFR50.59;
 - Proposed changes to the programs required in Section B to verify that such changes do not involve a change to the Technical Specifications and will not involve an unreviewed safety question as defined in 10CFR50.59; and
 - Proposed changes to the Technical Specification Bases.

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Appendix D (Continued)

2. Independent Review and Audit Committee (IRAC)

The IRAC is responsible for reviewing, auditing, and advising the President of Yankee Atomic Electric Company (or a designee) on matters related to the safe storage of irradiated fuel. This review and audit function is independent of line organization responsibilities.

- a. The IRAC shall include a minimum of five members. Alternates may be substituted for regular members. The licensee shall designate in writing the chairman, the members, and alternates for the IRAC. The chairman shall not have management responsibilities for, or report to, the line organizations responsible for operation or maintenance of the fuel storage facility.
- b. The IRAC shall collectively have experience and knowledge in the following functional areas:
 - Fuel handling and storage (including the potential for criticality),
 - Chemistry and Radiochemistry,
 - Engineering,
 - Radiation Protection, and
 - Quality Assurance.

If necessary, individuals with knowledge and experience in other functional areas may be utilized to provide advice to the IRAC.

- c. The IRAC shall hold at least one meeting per quarter.
- d. A quorum shall consist of three regular members or their duly appointed alternates. Those members representing the line organizations responsible for the operation and maintenance of the facility shall not constitute a majority of the quorum. At least one member of the quorum shall be the chairman or the chairman's designated alternate.
- e. As a minimum, the IRAC shall perform the following functions:
 - Advise the Decommissioning Manager (or a designee) on all matters related to safe storage of irradiated fuel;
 - Advise the management of the audited organization and the Decommissioning Manager (or a designee) of audit results as they relate to safe storage of irradiated fuel;
 - Recommend to the management of the audited organization, and its management, any corrective action to improve the safe storage of irradiated fuel; and
 - Notify the President of Yankee Atomic Electric Company of any safety significant disagreement between the IRAC and the Decommissioning Manager within 24 hours.

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- f. The IRAC shall be responsible for reviewing:
- The safety evaluations for procedures, and changes thereto, completed under the provisions of 10 CFR 50.59 to verify that such actions do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after implementation of the affected procedure;
 - Changes to systems, structures or components important to the safe storage of irradiated fuel to verify that such changes do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after implementation of the change;
 - Tests or experiments involving the safe storage of irradiated fuel to verify that such tests or experiments do not involve an unreviewed safety question as defined in 10 CFR 50.59. This review may be completed after performance of the test or experiment;
 - Proposed changes to the YNPS Technical Specifications or the license;
 - Violations of codes, regulations, orders, license requirements, or internal procedures/instructions having nuclear safety significance;
 - Indications of unanticipated deficiencies in any aspect of design or operation of systems, structures or components that could affect safe storage of irradiated fuel;
 - Significant accidental, unplanned, or uncontrolled radioactive releases, including corrective action(s) to prevent recurrence;
 - Significant operating abnormalities or deviations from normal and expected performance of equipment that affect safe storage of irradiated fuel;
 - The performance of the corrective action system; and
 - Internal and external experience information related to the safe storage of irradiated fuel that may indicate areas for improving facility safety.

Reports or records of these reviews shall be forwarded to the Decommissioning Manager within 30 days after completion of the review.

- g. The IRAC's audit responsibilities shall encompass:
- Conformance of irradiated fuel storage to provisions contained within the YNPS Technical Specifications and applicable license conditions at least once per 12 months;

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- The training and qualifications of facility staff at least once per 12 months;
- Implementation of all programs required by Section B at least once per 24 months;
- Actions taken to correct deficiencies occurring in systems, structures components, or methods of operation that affect safe storage of irradiated fuel at least once per 6 months;
- Facility operations, modifications, maintenance, and Surveillance related to the safe storage of irradiated fuel to verify independently that these activities are performed safely and correctly at least once per 24 months; and
- Other activities and documents as requested by the Decommissioning Manager (or a designee).

Reports of records of these audits, including any recommendations for improving the safe storage of irradiated fuel, shall be forwarded to the Decommissioning Manager (or a designee) within 30 days after completion of the audit.

3. Records

Written records of reviews and audits shall be maintained. As a minimum, these records shall include:

- a. Results of the activities conducted under the provisions of Sections A.1 and A.2;
- b. Recommendations to the management of the audited organization;
- c. An assessment of the safety significance of review or audit findings;
- d. Documentation of reviews conducted under Section A.1.c; and
- e. Determination of whether each item considered under Section A.2.f (first three items) involves an unreviewed safety question as defined in 10CFR50.59.

B. PROCEDURES AND PROGRAMS

1. Written procedures shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.2 through 5.2.9 and 5.3 of ANSI N18.7-1972 and Appendix "A" of Regulatory Guide 1.33, Revision 2, except as provided in B.2 below. The written procedures shall also cover the activities relating to:
 - a. Fire Protection Program implementation.
 - b. PROCESS CONTROL PROGRAM implementation.

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- c. OFF-SITE DOSE CALCULATION MANUAL implementation.
 - d. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.
2. Each procedure and administrative policy of B.1 above, and changes thereto, shall be reviewed by an Independent Safety Reviewer and approved by the Decommissioning Manager prior to implementation and reviewed periodically as set forth in administrative procedures.
 3. Temporary changes to procedures of B.1 above may be made provided:
 - a. The intent of the original procedure is not altered.
 - b. The change is approved by two members of the plant management staff, at least one of whom is a Certified Fuel Handler.
 - c. The change is documented and approved by the Decommissioning Manager within 14 days of implementation.
 4. The following programs shall be established, implemented, and maintained:
 - a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR, Part 20, Appendix B, Table II, Column 2;
- Monitoring, sampling, and analysis of radioactive liquid, and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM;
- Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR, Part 50;

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- Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2% of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR, Part 50.
- Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR, Part 20, Appendix B, Table II, Column 1;
- Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR, Part 50;
- Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR, Part 50;
- Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR, Part 190.

b. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the Effluent Monitoring Program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM; (2) conform to the guidance of Appendix I to 10 CFR, Part 50; and (3) include the following:

- Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

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- Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the Quality Assurance Program for environmental monitoring.

C. RECORD RETENTION

1. The following records shall be retained for at least 5 years:
 - a. Records and logs of facility operation covering time interval at each power level.
 - b. Records and logs of principal maintenance activities, inspection, repair and replacement of principal items of equipment related to nuclear safety.
 - c. All REPORTABLE EVENT reports submitted to the Commission.
 - d. Records of surveillance activities, inspections and calibrations required by Technical Specifications.
 - e. Records of reactor tests and experiments.
 - f. Records of changes made to Operating Procedures.
 - g. Records of radioactive shipments.
 - h. Records of sealed source leak tests and results.
 - i. Records of annual physical inventory of all sealed source material of record.
2. The following records shall be retained for the duration of the Possession Only License:
 - a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the FSAR.
 - b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
 - c. Records of facility radiation and contamination surveys.
 - d. Records of radiation exposure for all individuals entering radiation control areas.
 - e. Records of gaseous and liquid radioactive material released to the environs.
 - f. Records of transient or operational cycles for the Reactor Pressure Vessel.

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- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to Technical Specifications.
- i. Records of Quality Assurance activities required by the YDQAP.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of Independent Safety Reviews and the IRAC meetings, and records of the Plant Operational Review Committee (PORC) and the Nuclear Safety Audit and Review Committee (NSARC), the review and audit functions which preceded the Independent Safety Review function and IRAC.
- l. Records for Environmental Qualification.
- m. Records of analysis required by the Radiological Environmental Monitoring Program.
- n. Records of the service lives of all snubbers, including the date at which the service life commences and associated installation and maintenance records.
- o. Records of reviews performed for changes made to the OFF-SITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.