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2. An SRO or an SRO with a license limited to fuel handling shall directly supervise all Core Alterations. This person shall have no other duties during this time;
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4. In the event of illness or unexpected absence, up to two (2) hours is allowed to restore the shift crew to the minimum complement.
5. The Operations Manager or Assistant Operations Manager, Shift Manager and Control Room Supervisor shall hold an SRO license and the Senior Nuclear Operator and the Nuclear Control Operator shall hold an RO license or an SRO license.
6. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, health physicists, auxiliary operators, and maintenance personnel who are working on safety-related systems.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8 to 12 hours a day, nominal 40-hour week, while the plant is operating.

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

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 168 hour period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, shift turnover time can be included in the breaktime.
- d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Site Executive Officer or the General Manager - Operations, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Site Executive Officer or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

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### 6.3 PLANT STAFF QUALIFICATIONS

- 6.3.1 The minimum qualifications with regard to educational background and experience for plant staff positions shown in FSAR Figure 13.2-7 shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions; except for the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- 6.3.2 The Shift Technical Advisor (STA) shall meet or exceed the minimum requirements of either Option 1 (Combined SRO/STA Position) or Option 2 (Continued use of STA Position), as defined in the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621). When invoking Option 1, the STA role may be filled by the Shift Manager or Control Room Supervisor. (1)
- 6.3.3 Any deviations will be justified to the NRC prior to an individual's filling of one of these positions.

#### NOTE:

- (1) The 13 individuals who hold SRO licenses, and have completed the FitzPatrick Advanced Technical Training Program prior to the issuance of License Amendment 111, shall be considered qualified as dual-role SRO/STAs.

### 6.4 RETRAINING AND REPLACEMENT TRAINING

A training program shall be maintained under the direction of the Training Manager to assure overall proficiency of the plant staff organization. It shall consist of both retraining and replacement training and shall meet or exceed the minimum requirements of Section 5.5 of ANSI N18.1-1971.

The retraining program shall not exceed periods two years in length with a curriculum designed to meet or exceed the requalification requirements of 10 CFR 55.59

### 6.5 REVIEW AND AUDIT

Review requirements are completed by using designated technical reviewers/qualified safety reviewer and two separate review committees. The Plant Operating Review Committee (PORC) is an onsite review group; the Safety Review Committee (SRC) is an independent offsite review and audit group.

#### 6.5.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

- 6.5.0.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 6.5.0.2 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two designated technical reviewers who are knowledgeable in the affected functional area.

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6.11 (A) High Radiation Area

1. In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each High Radiation Area (i.e.,  $\geq 100$  mrem/hr) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). \* Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
  - a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
  - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
  - c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility health physicist in the Radiation Work Permit.
2. The requirements of 6.11.A.1 above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the radiation protection manager.

\*Radiation protection personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

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**6.21 CONFIGURATION RISK MANAGEMENT PROGRAM**

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed allowed outage time has been granted. The program is to include the following:

- a. Provisions for the control and implementation of a Level 1 at-power internal events PRA-informed methodology. The assessment is to be capable of evaluating the applicable plant configuration.
- b. Provisions for performing an assessment prior to entering the plant configuration described by the Limiting Conditions for Operation (LCO) Action Statement for preplanned activities.
- c. Provisions for performing an assessment after entering the plant configuration described by the LCO Action Statement for unplanned entry into the LCO Action Statement.
- d. Provisions for assessing the need for additional actions after the discovery of additional equipment-out-of-service conditions while in the plant configuration described by the LCO Action Statement.
- e. Provisions for considering other applicable risk-significant contributors such as Level 2 issues and external events, qualitatively or quantitatively.

**6.22 OFFGAS TREATMENT SYSTEM EXPLOSIVE GAS MONITORING PROGRAM**

The program provides controls for potentially explosive gas mixtures contained in the Main Condenser Offgas Treatment System.

The program shall include the limits for concentration of hydrogen and oxygen in the Main Condenser Offgas Treatment System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion).

The provisions of Specification 3.0.B and 4.0.C are applicable to the program surveillance frequencies.

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## RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

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LIMITING CONDITIONS FOR OPERATION

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SURVEILLANCE REQUIREMENTS

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**LIMITING CONDITIONS FOR OPERATION**

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3.8 STANDBY GAS TREATMENT SYSTEM (SBGTS)

Four radiation monitors are provided which initiate isolation of the reactor building and operating of the SBGTS. The monitors are located as follows: two in the reactor building ventilation exhaust duct and two in refuel floor ventilation exhaust duct. Each pair is considered a separate system. The trip logic consists of any upscale trip on a single monitor or a downscale trip on both monitors in a pair to cause the desired action.

Trip settings for the monitors in the refueling area ventilation exhaust ducts are based upon initiating normal ventilation isolation and SBGTS operation so that most of the activity released during the refueling accident is processed by the SBGTS.

The radiation monitors in the refueling area ventilation duct which initiate building isolation and standby gas treatment operation are arranged in a one out of two logic system. The air ejector offgas monitors are connected in a two out of two logic arrangement. Based on experience with instruments of similar design, a testing interval of once every three months has been found adequate.

3.9 MECHANICAL VACUUM PUMP ISOLATION

3.10 MAIN CONTROL ROOM VENTILATION RADIATION MONITOR