

July 31, 1989

Mr. Steven E. Miltenberger
Vice President and Chief Nuclear
Officer
Public Service Electric & Gas Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Dear Mr. Miltenberger:

SUBJECT: REMOVAL OF ORGANIZATION CHARTS FROM TECHNICAL SPECIFICATIONS
(TAC NOS. 71099/71100)

RE: SALEM GENERATING STATION, UNIT NOS. 1 AND 2

The Commission has issued the enclosed Amendment Nos. 99 and 76 to Facility Operating License Nos. DPR-70 and DPR-75 for the Salem Generating Station, Unit Nos. 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated July 15, 1988 and supplemented by letters dated April 25, 1989 and May 24, 1989. The supplemental letter dated April 25, 1989, revised the original submittal to provide the title of the senior corporate official responsible for nuclear safety. The supplemental letter dated May 24, 1989 provided corrected Technical Specification pages and did not change the original submittal.

These amendments delete the organization charts, Figures 6.2-1 and 6.2-2 and replace them with more general organizational requirements.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/S/

James C. Stone, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

8908140203 890731
PDR ADDCK 05000272
P PNU

Enclosures:

- 1. Amendment No. 99 to License No. DPR-70
- 2. Amendment No. 76 to License No. DPR-75
- 3. Safety Evaluation

cc w/enclosures:
See next page

DISTRIBUTION w/enclosures:

Docket File	MO'Brien (2)	Wanda Jones	Brent Clayton
NRC PDR	OGC	JCalvo	EWenzinger
Local PDR	DHagan	Tech Branch	BBoger
PDI-2 Reading	EJordan	ACRS (10)	
WButler	BGrimes	CMiles, GPA/PA	
JStone/MThadani	TMeek (8)	RDiggs, ARM/LFMB	

CP-1
CC

[SALEM LETTER]

PDI-2/AA
MO'Brien
7/28/89
PDI-2/PM
JStone:tr
7/12/89

OGC W/changes
7/17/89

PDI-2/D
WButler
7/31/89

DF01
/1



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 31, 1989

Docket Nos. 50-272/311

Mr. Steven E. Miltenberger
Vice President and Chief Nuclear
Officer
Public Service Electric & Gas Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Dear Mr. Miltenberger:

SUBJECT: REMOVAL OF ORGANIZATION CHARTS FROM TECHNICAL SPECIFICATIONS
(TAC NOS. 71099/71100)

RE: SALEM GENERATING STATION, UNIT NOS. 1 AND 2

The Commission has issued the enclosed Amendment Nos. 99 and 76 to Facility Operating License Nos. DPR-70 and DPR-75 for the Salem Generating Station, Unit Nos. 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated July 15, 1988 and supplemented by letters dated April 25, 1989 and May 24, 1989. The supplemental letter dated April 25, 1989, revised the original submittal to provide the title of the senior corporate official responsible for nuclear safety. The supplemental letter dated May 24, 1989 provided corrected Technical Specification pages and did not change the original submittal.

These amendments delete the organization charts, Figures 6.2-1 and 6.2-2 and replace them with more general organizational requirements.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script that reads "James C. Stone".

James C. Stone, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 99 to
License No. DPR-70
2. Amendment No. 76 to
License No. DPR-75
3. Safety Evaluation

cc w/enclosures:
See next page

Mr. Steven E. Miltenberger
Public Service Electric & Gas Company

Salem Nuclear Generating Station

cc:

Mark J. Wetterhahn, Esquire
Conner and Wetterhahn
Suite 1050
1747 Pennsylvania Avenue, NW
Washington, DC 20006

Richard B. McGlynn, Commission
Department of Public Utilities
State of New Jersey
101 Commerce Street
Newark, NJ 07102

Richard Fryling, Jr., Esquire
Law Department - Tower 5E
80 Park Place
Newark, NJ 07101

Regional Administrator, Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. L. K. Miller
General Manager - Salem Operations
Salem Generating Station
P.O. Box 236
Hancocks Bridge, NJ 08038

Lower Alloways Creek Township
c/o Mary O. Henderson, Clerk
Municipal Building, P.O. Box 157
Hancocks Bridge, NJ 08038

Mr. S. LaBruna
Vice President - Nuclear Operations
Nuclear Department
P.O. Box 236
Hancocks Bridge, New Jersey 08038

Mr. Bruce A. Preston, Manager
Licensing and Regulation
Nuclear Department
P.O. Box 236
Hancocks Bridge, NJ 08038

Robert Traee, Mayor
Lower Alloways Creek Township
Municipal Hall
Hancocks Bridge, NJ 08038

Mr. David Wersan
Assistant Consumer Advocate
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Kathy Halvey Gibson, Resident Inspector
Salem Nuclear Generating Station
U.S. Nuclear Regulatory Commission
Drawer I
Hancocks Bridge, NJ 08038

Scott B. Ungerer
MGR. - Joint Generation Projects
Atlantic Electric
P.O. Box 1500
1199 Black Horse Pike
Pleasantville, NJ 08232

Richard F. Engel
Deputy Attorney General
Department of Law and Public Safety
CN-112
State House Annex
Trenton, NJ 08625

Delmarva Power & Light Company
c/o Jack Urban
General Manager, Fuel Supply
800 King Street
P.O. Box 231
Wilmington, DE 19899

Mr. Kent Tosch, Chief
New Jersey Department of
Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
State of New Jersey
CN 415
Trenton, NJ 08625



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-272

SALEM GENERATING STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 99
License No. DPR-70

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Public Service Electric & Gas Company, Philadelphia Electric Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) dated July 15, 1988 and supplemented by letters dated April 25, 1989 and May 24, 1989 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-70 is hereby amended to read as follows:

8908140207 890731
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P PNU

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 99, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

- 3. This license amendment is effective as of its date of issuance to be implemented within 45 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 31, 1989

[Handwritten signature]
PDI-2/LA
MDF:Byen
7/12/89

[Handwritten signature]
PDI-2/PM
JStone:tr
7/12/89

[Handwritten signature]
note change
OGC
7/17/89

[Handwritten signature]
PDI-2/D
WButler
7/31/89

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 99, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance to be implemented within 45 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 31, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 99

FACILITY OPERATING LICENSE NO. DPR-70

DOCKET NO. 50-272

Revise Appendix A as follows:

Remove Pages

XVIII
XIX
6-1
-
6-2
6-3
6-8
6-9
6-9a
6-10
6-11
6-12
6-12a
-

Insert Pages

XVIII
XIX
6-1
6-1a
6-2
6-3
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6-9a
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6.1 RESPONSIBILITY

6.1.1 The General Manager - Salem Operations shall be responsible for overall facility operation and shall delegate, in writing, the succession to this responsibility during his absence.

6.1.2 The Senior Nuclear Shift Supervisor, or during his absence from the control room a designated individual, shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President and Chief Nuclear Officer, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Salem Updated Final Safety Analysis Report and updated in accordance with 10 CFR 50.71(e).
- b. The General Manager - Salem Operations shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President and Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 FACILITY STAFF

The facility organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

ADMINISTRATIVE CONTROLS

FACILITY STAFF (continued)

- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the control room area at all times
- c. A health physics technician* shall be on site when fuel is in the reactor.
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by a licensed Senior Reactor Operator who has no other concurrent responsibilities during this operation
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times*. The Fire Brigade shall not include 4 members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.
- f. The amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).
- g. The Operations Manager, Operating Engineer, Senior Nuclear Shift Supervisor, and Nuclear Shift Supervisor shall each hold a senior reactor operator license. The Nuclear Control Operators shall hold reactor operator licenses.

* The health physics technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of the health physics technician and/or Fire Brigade members provided immediate action is taken to restore the health physics technician and/or Fire Brigade to within the minimum requirements.

Figure 6.2-1 CORPORATE HEADQUARTERS AND OFF-SITE ORGANIZATION FOR
MANAGEMENT AND TECHNICAL SUPPORT

(Deleted)

FIGURE 6.2 - 2 FACILITY ORGANIZATION

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RESPONSIBILITIES

- 6.5.1.6 The Station Operations Review Committee shall be responsible for:
- a. Review of: (1) Station Administrative Procedures and changes thereto and (2) Newly created procedures or changes to existing procedures that involve a significant safety issue as described in Section 6.5.3.2.d.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to Appendix "A" Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Review of the safety evaluations that have been completed under the provisions of 10 CFR 50.59.
 - f. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President and Chief Nuclear Officer and the General Manager - Nuclear Safety Review.
 - g. Review of all REPORTABLE EVENTS.
 - h. Review of facility operations to detect potential nuclear safety hazards.
 - i. Performance of special reviews, investigations or analyses and reports thereon as requested by the General Manager - Salem Operations or General Manager - Nuclear Safety Review.
 - j. Review of the Facility Security Plan and implementing procedures and submittal of recommended changes to the General Manager - Nuclear Safety Review.
 - k. Review of the Facility Emergency Plan and implementing procedures and submittal of recommended changes to the General Manager - Nuclear Safety Review.
 - l. Review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the General Manager - Nuclear Safety Review.
 - m. Review of all unplanned on-site releases of radioactivity to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President and Chief Nuclear Officer and the General Manager - Nuclear Safety Review.

RESPONSIBILITIES (continued)

- n. Review of changes to the PROCESS CONTROL MANUAL and the OFF-SITE DOSE CALCULATION MANUAL.

SORC REVIEW PROCESS

6.5.1.7 A technical review and control system utilizing qualified reviewers shall function to perform the periodic or routine review of procedures and changes thereto. Details of this technical review process are provided in Section 6.5.3.

AUTHORITY

6.5.1.8 The Station Operations Review Committee shall:

- a. Recommend to the General Manager - Salem Operations written approval or disapproval of items considered under 6.5.1.6 (a) through (e) above.
- b. Provide written notification within 24 hours to the Vice President and Chief Nuclear Officer and the General Manager - Nuclear Safety Review of disagreement between the SORC and the General Manager - Salem Operations; however, the General Manager - Salem Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.9 The Station Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice President and Chief Nuclear Officer, the General Manager - Nuclear Safety Review and the Manager - Off-Site Review.

6.5.2 NUCLEAR SAFETY REVIEW

FUNCTION

6.5.2.1 The Nuclear Safety Review Department (NSR) shall function to provide the independent safety review program and audit of designated activities.

COMPOSITION

6.5.2.2 NSR shall consist of the General Manager - Nuclear Safety Review, the Manager - On-Site Safety Review Group (SRG), who is supported by at least four dedicated, full-time engineers located on-site, and the Manager Off-Site Review Group (OSR) who is supported by at least four dedicated, full-time engineers located off-site.* The OSR staff shall possess experience and competence in the general areas listed in Section 6.5.2.4. The General Manager and Managers shall determine when additional technical experts should assist in reviews of complex problems.

* Since the Nuclear Department is located on Artificial Island site, the terms "on-site" and "off-site" convey the distinction between inside and outside the station fence, respectively

COMPOSITION (continued)

NSR shall utilize a system of qualified reviewers from other technical organizations to augment its expertise in the disciplines of Section 6.5.2.4. Such qualified reviewers shall meet the same qualification requirements as the NSR staff, and will not have been involved with performance of the original work.

The Manager - Off-Site Review and Staff shall meet or exceed the qualifications described in Section 4.7 of ANS 3.1(1981) and shall be guided by the provisions for independent review described in Section 4.3 of ANSI N18.7 (1976) (ANS 3.2). The Manager - On Site Review and staff will meet or exceed the qualifications described in Section 4.4 of ANS 3.1 (1981).

CONSULTANTS

6.5.2.3 Consultants shall be utilized as determined by the General Manager - Nuclear Safety Review to provide expert advice to the NSR.

OFF-SITE REVIEW GROUP

6.5.2.4 The Off-Site Review Group (OSR) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear Power Plant Operations
- b. Nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological Safety
- g. Mechanical Engineering
- h. Electrical Engineering
- i. Quality Assurance
- j. Nondestructive Testing
- k. Emergency Preparedness

The OSR shall also function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

REVIEW

6.5.2.4.1 The OSR shall review:

- a. Safety Evaluations for
 - 1) Changes to procedures, equipment, or systems and
 - 2) Tests or experiments completed under the provisions of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment, or systems that involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments that involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- d. Proposed changes to Technical Specifications or to the Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems or components.
- i. Reports and meeting minutes of the Station Operations Review Committee.

AUDITS

6.5.2.4.2 Audits of facility activities that are required to be performed under the cognizance of OSR are listed below:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the Criteria of Appendix "B", 10CFR50, at least once per 24 months.

AUDITS (continued)

- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the General Manager - Nuclear Safety Review or the Vice President and Chief Nuclear Officer.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.

The above audits shall be conducted by the Nuclear Quality Assurance Department or an independent consultant as required. Audit results and recommendations shall be reviewed by OSR.

ON-SITE SAFETY REVIEW GROUP

6.5.2.5 The On-Site Safety Review Group (SRG) shall function to provide: the review of plant design and operating experience for potential opportunities to improve plant safety; the evaluation of plant operations and maintenance activities; and advice to management on the overall quality and safety of plant operations.

The SRG shall make recommendations for revised procedures, equipment modifications, or other means of improving plant safety to appropriate station/ corporate management.

RESPONSIBILITIES

6.5.2.5.1 The SRG shall be responsible for:

- a. Review of selected plant operating characteristics, NRC issuances, industry advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety.
- b. Review of selected facility features, equipment, and systems.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (continued)

- c. Review of selected procedures and plant activities including maintenance, modification, operational problems, and operational analysis.
- d. Surveillance of selected plant operations and maintenance activities to provide independent verification* that they are performed correctly and that human errors are reduced to as low as reasonably achievable.

NSR AUTHORITY

6.5.2.6 NSR shall report to and advise the Vice President and Chief Nuclear Officer on those areas of responsibility specified in Sections 6.5.2.4 and 6.5.2.5.

6.5.2.7 Records of NSR activities shall be prepared and maintained. Reports of reviews and audits shall be distributed as follows:

- a. Reports of reviews encompassed by Section 6.5.2.4.1 above, shall be prepared, approved and forwarded to the Vice President and Chief Nuclear Officer, within 14 days following completion of the review.
- b. Audit reports encompassed by Section 6.5.2.4.2 above, shall be forwarded to the Vice President and Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Programs required by Technical Specification 6.8 and other procedures which affect nuclear safety as determined by the General Manager - Salem Operations, other than editorial or typographical changes shall be reviewed as follows:

PROCEDURE RELATED DOCUMENTS

6.5.3.2 Procedures, Program and changes thereto shall be reviewed as follows:

- a. Each newly created procedure, program or change thereto shall be independently reviewed by an individual knowledgeable in the subject area other than the individual who prepared the procedure, program or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Station Administrative procedures will be approved by the appropriate Station Department Manager or by the Assistant General Manager - Salem Operations. Each Station Department Manager shall be responsible for a predesignated class of procedures. The General Manager - Salem Operations shall approve Station Administrative Procedures, Security Plan implementing procedures and Emergency Plan implementing procedures.

* Not responsible for sign-off function

- b. On-the-spot changes to procedures which clearly do not change the intent of the approved procedures shall be approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator License. Revisions to procedures which may involve a change in intent of the approved procedures, shall be reviewed in accordance with Section 6.5.3.2.a above.
- c. Individuals responsible for reviews performed in accordance with item 6.5.3.2a above shall be approved by the SORC Chairman and designated as Station Qualified Reviewers. A system of Station Qualified Reviewers, each of whom shall possess qualifications that meet or exceed the requirements of Section 4.4 of ANSI N18.1 - 1971, shall be maintained by the SORC Chairman. Each review shall include a written determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate designated review personnel.
- d. If the Department Manager determines that the documents involved contain significant safety issues, the documents shall be forwarded for SORC review and also to NSR for an independent review to determine whether or not an unreviewed safety question is involved. Pursuant to 10CFR50.59, NRC approval of items involving unreviewed safety questions or Technical Specification changes shall be obtained prior to implementation.

NON-PROCEDURE RELATED DOCUMENTS

6.5.3.3 Tests or experiments, changes to Technical Specifications, and changes to equipment or systems shall be forwarded for SORC review and also to NSR for an independent review to determine whether or not an unreviewed safety question is involved. The results of NSR reviews will be provided to SORC. Recommendations for approval are made by SORC to the General Manager - Salem Operations. Pursuant to 10CFR50.59, NRC approval of items involving unreviewed safety questions or requiring Technical Specification changes shall be obtained prior to implementation.

RECORDS

6.5.3.4 Written records of reviews performed in accordance with item 6.5.3.2a above, including recommendations for approval or disapproval, shall be maintained. Copies shall be provided to the General Manager - Salem Operations, SORC, NSR and/or NRC as necessary when their reviews are required.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC and the resultant Licensee Event Report submitted to NSR and the Vice President and Chief Nuclear Officer.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The unit shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Vice President and Chief Nuclear Officer and General Manager - Nuclear Safety Review shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the General Manager - Nuclear Safety Review and the Vice President and Chief Nuclear Officer within 14 days of the violation.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-311

SALEM GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 76
License No. DPR-75

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Public Service Electric & Gas Company, Philadelphia Electric Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) dated July 15, 1988 and supplemented by letters dated April 25, 1989 and May 24, 1989 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-75 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 76, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance to be implemented within 45 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 31, 1989

PDI-2/LA
MO'Brien
7/12/89

PDI-2/PM
JStone:tr
7/12/89

OGC
7/17/89

PDI-2/D
WButler
7/31/89

WB

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 76, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance to be implemented within 45 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 31, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 76

FACILITY OPERATING LICENSE NO. DPR-75

DOCKET NO. 50-311

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
XVIII	XVIII
XIX	XIX
6-1	6-1
-	6-1a
6-2	6-2
6-3	6-3
6-8	6-8
6-9	6-9
6-9a	6-9a
6-10	6-10
6-11	6-11
6-12	6-12
6-12a	6-12a
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6.1 RESPONSIBILITY

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

6.1.2 The Senior Nuclear Shift Supervisor or, during his absence from the Control Room, a designated individual shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice President and Chief Nuclear Officer, shall be reissued to a station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Salem Updated Final Safety Analysis Report and updated in accordance with 10 CFR 50.71(e).
- b. The General Manager - Salem Operations shall be responsible for overall facility safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plants.
- c. The Vice President and Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plants to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 FACILITY STAFF

The facility organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

FACILITY STAFF (Continued)

- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room area at all times.
- c. A health physics technician* shall be on site when fuel is in the reactor.
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by a licensed Senior Reactor Operator who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times*. The Fire Brigade shall not include 4 members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.
- f. The amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).
- g. The Operations Manager, Operating Engineer, Senior Nuclear Shift Supervisors, and Nuclear Shift Supervisors shall each hold a senior reactor operator license. The Nuclear Control Operators shall hold reactor operator licenses.

* The health physics technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of the health physics technician and/or Fire Brigade members provided immediate action is taken to restore the health physics technician and/or Fire Brigade to within the minimum requirements.

Figure 6.2-1 CORPORATE HEADQUARTERS AND OFF-SITE ORGANIZATION FOR
MANAGEMENT AND TECHNICAL SUPPORT

(Deleted)

FIGURE 6.2-2 FACILITY ORGANIZATION

(Deleted)

RESPONSIBILITIES

- 6.5.1.6 The Station Operations Review Committee shall be responsible for:
- a. Review of: (1) Station Administrative Procedures and changes thereto and (2) Newly created procedures or changes to existing procedures that involve a significant safety issue as described in Section 6.5.3.2.d.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to Appendix "A" Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Review of the safety evaluations that have been completed under the provisions of 10CFR50.59.
 - f. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President and Chief Nuclear Officer and the General Manager - Nuclear Safety Review.
 - g. Review of all REPORTABLE EVENTS.
 - h. Review of facility operations to detect potential nuclear safety hazards.
 - i. Performance of special reviews, investigations or analyses and reports thereon as requested by the General Manager - Salem Operations or General Manager - Nuclear Safety Review.
 - j. Review of the Facility Security Plan and implementing procedures and submittal of recommended changes to the General Manager - Nuclear Safety Review.
 - k. Review of the Facility Emergency Plan and implementing procedures and submittal of recommended changes to the General Manager - Nuclear Safety Review.
 - l. Review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the General Manager - Nuclear Safety Review.
 - m. Review of all unplanned on-site releases of radioactivity to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President and Chief Nuclear Officer and the General Manager - Nuclear Safety Review.

RESPONSIBILITIES (continued)

- n. Review of changes to the PROCESS CONTROL MANUAL and the OFF-SITE DOSE CALCULATION MANUAL.

SORC REVIEW PROCESS

6.5.1.7 A technical review and control system utilizing qualified reviewers shall function to perform the periodic or routine review of procedures and changes thereto. Details of this technical review process are provided in Section 6.5.3.

AUTHORITY

6.5.1.8 The Station Operations Review Committee shall:

- a. Recommend to the General Manager - Salem Operations written approval or disapproval of items considered under 6.5.1.6 (a) through (e) above.
- b. Provide written notification within 24 hours to the Vice President and Chief Nuclear Officer and the General Manager - Nuclear Safety Review of disagreement between the SORC and the General Manager - Salem Operations; however, the General Manager - Salem Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.9 The Station Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice President and Chief Nuclear Officer, the General Manager - Nuclear Safety Review and the Manager - Off-Site Review.

6.5.2 NUCLEAR SAFETY REVIEW

FUNCTION

6.5.2.1 The Nuclear Safety Review Department (NSR) shall function to provide the independent safety review program and audit of designated activities.

COMPOSITION

6.5.2.2 NSR shall consist of the General Manager - Nuclear Safety Review, the Manager - On-Site Safety Review Group (SRG), who is supported by at least four dedicated, full-time engineers located on-site, and the Manager Off-Site Review Group (OSR) who is supported by at least four dedicated, full-time engineers located off-site.* The OSR staff shall possess experience and competence in the general areas listed in Section 6.5.2.4. The General Manager and Managers shall determine when additional technical experts should assist in reviews of complex problems.

* Since the Nuclear Department is located on Artificial Island site, the terms "on-site" and "off-site" convey the distinction between inside and outside the station fence, respectively.

COMPOSITION (continued)

NSR shall utilize a system of qualified reviewers from other technical organizations to augment its expertise in the disciplines of Section 6.5.2.4. Such qualified reviewers shall meet the same qualification requirements as the NSR staff, and will not have been involved with performance of the original work.

The Manager - Off-Site Review and Staff shall meet or exceed the qualifications described in Section 4.7 of ANS 3.1(1981) and shall be guided by the provisions for independent review described in Section 4.3 of ANSI N18.7 (1976) (ANS 3.2). The Manager - On Site Review and staff will meet or exceed the qualifications described in Section 4.4 of ANS 3.1 (1981).

CONSULTANTS

6.5.2.3 Consultants shall be utilized as determined by the General Manager - Nuclear Safety Review to provide expert advice to the NSR.

OFF-SITE REVIEW GROUP

6.5.2.4 The Off-Site Review Group (OSR) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear Power Plant Operations
- b. Nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological Safety
- g. Mechanical Engineering
- h. Electrical Engineering
- i. Quality Assurance
- j. Nondestructive Testing
- k. Emergency Preparedness

The OSR shall also function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources which may indicate areas for improving plant safety.

REVIEW

6.5.2.4.1 The OSR shall review:

- a. Safety Evaluations for
 - 1) Changes to procedures, equipment, or systems and
 - 2) Tests or experiments completed under the provisions of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment, or systems that involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- c. Proposed tests or experiments that involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- d. Proposed changes to Technical Specifications or to the Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems or components.
- i. Reports and meeting minutes of the Station Operations Review Committee.

AUDITS

6.5.2.4.2 Audits of facility activities that are required to be performed under the cognizance of OSR are listed below:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training, and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the Criteria of Appendix "B", 10CFR50, at least once per 24 months.

AUDITS (continued)

- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the General Manager - Nuclear Safety Review or the Vice President and Chief Nuclear Officer.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.

The above audits shall be conducted by the Nuclear Quality Assurance Department or an independent consultant as required. Audit results and recommendations shall be reviewed by OSR.

ON-SITE SAFETY REVIEW GROUP

6.5.2.5 The On-Site Safety Review Group (SRG) shall function to provide: the review of plant design and operating experience for potential opportunities to improve plant safety; the evaluation of plant operations and maintenance activities; and advice to management on the overall quality and safety of plant operations.

The SRG shall make recommendations for revised procedures, equipment modifications, or other means of improving plant safety to appropriate station/ corporate management.

RESPONSIBILITIES

6.5.2.5.1 The SRG shall be responsible for:

- a. Review of selected plant operating characteristics, NRC issuances, industry advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety.
- b. Review of selected facility features, equipment, and systems.

RESPONSIBILITIES (continued)

- c. Review of selected procedures and plant activities including maintenance, modification, operational problems, and operational analysis.
- d. Surveillance of selected plant operations and maintenance activities to provide independent verification* that they are performed correctly and that human errors are reduced to as low as reasonably achievable.

NSR AUTHORITY

6.5.2.6 NSR shall report to and advise the Vice President and Chief Nuclear Officer on those areas of responsibility specified in Sections 6.5.2.4 and 6.5.2.5.

6.5.2.7 Records of NSR activities shall be prepared and maintained. Reports of reviews and audits shall be distributed as follows:

- a. Reports of reviews encompassed by Section 6.5.2.4.1 above, shall be prepared, approved and forwarded to the Vice President and Chief Nuclear Officer, within 14 days following completion of the review.
- b. Audit reports encompassed by Section 6.5.2.4.2 above, shall be forwarded to the Vice President and Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Programs required by Technical Specification 6.8 and other procedures which affect nuclear safety as determined by the General Manager - Salem Operations, other than editorial or typographical changes shall be reviewed as follows:

PROCEDURE RELATED DOCUMENTS

6.5.3.2 Procedures, Program and changes thereto shall be reviewed as follows:

- a. Each newly created procedure, program or change thereto shall be independently reviewed by an individual knowledgeable in the subject area other than the individual who prepared the procedure, program or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Station Administrative procedures will be approved by the appropriate Station Department Manager or by the Assistant General Manager - Salem Operations. Each Station Department Manager shall be responsible for a predesignated class of procedures. The General Manager - Salem Operations shall approve Station Administrative Procedures, Security Plan implementing procedures and Emergency Plan implementing procedures.

* Not responsible for sign-off function

PROCEDURE RELATED DOCUMENTS (continued)

- b. On-the-spot changes to procedures which clearly do not change the intent of the approved procedures shall be approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator License. Revisions to procedures which may involve a change in intent of the approved procedures, shall be reviewed in accordance with Section 6.5.3.2.a above.
- c. Individuals responsible for reviews performed in accordance with item 6.5.3.2a above shall be approved by the SORC Chairman and designated as Station Qualified Reviewers. A system of Station Qualified Reviewers, each of whom shall possess qualifications that meet or exceed the requirements of Section 4.4 of ANSI N18.1 - 1971, shall be maintained by the SORC Chairman. Each review shall include a written determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate designated review personnel.
- d. If the Department Manager determines that the documents involved contain significant safety issues, the documents shall be forwarded for SORC review and also to NSR for an independent review to determine whether or not an unreviewed safety question is involved. Pursuant to 10CFR50.59, NRC approval of items involving unreviewed safety questions or Technical Specification changes shall be obtained prior to implementation.

NON-PROCEDURE RELATED DOCUMENTS

6.5.3.3 Tests or experiments, changes to Technical Specifications, and changes to equipment or systems shall be forwarded for SORC review and also to NSR for an independent review to determine whether or not an unreviewed safety question is involved. The results of NSR reviews will be provided to SORC. Recommendations for approval are made by SORC to the General Manager - Salem Operations. Pursuant to 10CFR50.59, NRC approval of items involving unreviewed safety questions or requiring Technical Specification changes shall be obtained prior to implementation.

RECORDS

6.5.3.4 Written records of reviews performed in accordance with item 6.5.3.2a above, including recommendations for approval or disapproval, shall be maintained. Copies shall be provided to the General Manager - Salem Operations, SORC, NSR and/or NRC as necessary when their reviews are required.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC and the resultant Licensee Event Report submitted to NSR and the Vice President and Chief Nuclear Officer.

6.7 SAFETY LIM VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The unit shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Vice President and Chief Nuclear Officer and General Manager - Nuclear Safety Review shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the General Manager - Nuclear Safety Review and the Vice President and Chief Nuclear Officer within 14 days of the violation.



UNITED STATES
CLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NOS. 99 AND 76 TO FACILITY OPERATING

LICENSE NOS. DPR-70 AND DPR-75

PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

SALEM GENERATING STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-272 AND 50-311

1.0 INTRODUCTION

By letter dated July 15, 1988 and supplemented by letters dated April 25, 1989 and May 24, 1989, Public Service Electric & Gas Company requested an amendment to Facility Operating License Nos. DPR-70 and DPR-75 for the Salem Generating Station, Unit Nos. 1 and 2. The April 25, 1989 letter revised the original submittal to provide the title of the senior corporate official responsible for nuclear safety. The May 24, 1989 letter provided revised Technical Specification pages. The proposed amendments would delete the organization charts, Figures 6.2-1 and 6.2-2 from the Technical Specifications and replace them with a more generalized organizational requirement.

2.0 EVALUATION

The Technical Specifications currently have organization charts included. The NRC staff experience has shown that organization charts can be modified in many ways while maintaining adequate operational safety. The staff has issued Generic Letter 88-06, Removal of Organization Charts from Technical Specification Administrative Control Requirements, to provide guidance to the utilities in removing the organization charts.

The proposed amendments make two types of changes to the Administrative Controls, Section 6.0, of the Salem Generating Station Technical Specifications, Units 1 and 2. The first change involves the deletion of the offsite and onsite organization charts, Figures 6.2-1 and 6.2-2, and replaces them with more general requirements which capture the essential aspects of the organizational structure. Technical Specifications (TSs) 6.1.1 and 6.1.2 have been supplemented with the necessary general requirements specified in Generic Letter 88-06, dated March 22, 1988.

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P PNU

The second change replaces the reference to the Vice President - Nuclear, contained in TS 6.1.2, with the title Vice President and Chief Nuclear Officer. For consistency, TSs 6.2.1, 6.5.1.6, 6.5.1.8, 6.5.1.9, 6.5.2.4.2, 6.5.2.6, 6.5.2.7, 6.6.1, and 6.7.1, have also had the title, Vice President - Nuclear, replaced with the title, Vice President and Chief Nuclear Officer. This change is necessary because the title, Vice President - Nuclear, has been changed to, Vice President and Chief Nuclear Officer, and the Technical Specifications as currently structured should reflect this change.

The NRC staff will continue to be informed of organizational changes through other required controls. The Code of Federal Regulations, Title 10, Part 50.34(b)(6)(i) requires that the applicants organizational structure be included in the Final Safety Analysis Report. Chapter 13 of the Salem Generating Station Updated Safety Analysis Report (UFSAR) provides a description of the organization and detailed organization charts. This chapter of the UFSAR already contains the minimum information specified in Generic Letter 88-06. In accordance with 10 CFR 50.71(e), PSE&G submits annual updates to the UFSAR and has committed to continue this practice. In addition, changes to the organization described in the Quality Assurance Program are governed by 10 CFR 50, Appendix B and by 10 CFR 50.54(a)(3). Any changes to the organizational structure which have the potential to decrease the effectiveness of the Quality Assurance Program require prior NRC approval.

Furthermore, it has been PSE&G's practice to inform the NRC of major organizational changes affecting the nuclear facilities prior to implementation. They have restated their intention to continue this practice for such future changes in organizational structure.

The Index is also being revised to bring it into agreement with the aforementioned changes and to update it to reflect the actual location of the sections.

The licensee's proposal is in conformance with the guidance provided in Generic Letter 88-06 and is therefore acceptable.

In addition, administrative clarifications and typographical corrections were made to the licensee's incoming technical specification pages and bars were added to those pages to show the changes.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to administrative requirements. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

4.0 CONCLUSION

The Commission made a proposed determination that the amendments involve no significant hazards consideration which was published in the Federal Register (54 FR 23322) on May 31, 1989 and consulted with the State of New Jersey. No public comments were received and the State of New Jersey did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributor: Jim Stone

Dated: July 31, 1989