

January 31, 1989

Docket No. 50-354

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 AND
ADMINISTRATIVE CHANGES TO SECTION 6.0 (TAC NO. 68889)

Re: HOPE CREEK GENERATING STATION

The Commission has issued the enclosed Amendment No. 21 to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated July 12, 1988.

This amendment would remove the organization charts from Section 6.0 of the TS and replace them with a narrative description of offsite and onsite organizations functional requirements per guidance provided by NRC Generic Letter 88-06. It would also make a couple of other minor administrative changes to Section 6.0. On December 5, 1988 the licensee clarified position titles for this amendment.

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

Sincerely,

Walter R. Butler for

Clyde Shiraki, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

8902150281 890131
PDR ADOCK 05000354
P PNU

Enclosures:

1. Amendment No. 21 to License No. NPF-57
2. Safety Evaluation

cc w/enclosures:
See next page

DISTRIBUTION:

Docket File	MO'Brien (2)	Wanda Jones	SVarga
NRC PDR	OGC	EButcher	BBoger
Local PDR	DHagan	Tech Branch	Brent Clayton
PDI-2 Reading	EJordan	ACRS (10)	RGallo
WButler	BGrimes	CMiles, GPA/PA	
GRivenbark(3)/SBrown	TBarnhart (4)	RDiggs, ARM/LFMB	

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DF01
11

Previously concurred*

PDI-2/LA*	PDI-2/PM	PDI-2/D*	OGC*	HFB/BC*
MO'Brien	CShiraki:mr	WButler	CWoodhead	WRegan
01/31/89	/ /89	01/31/89	11/09/88	11/02/88
	GR 11/02/88			
	CS 01/13/89			

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George Rivenbark, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

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RRIT/AVLA
MO'Brien
1/31/89

PDI-2/PM
GGivenbark:mr
11/2/88

PDI-2/D
WButler
1/31/88

HFB/BC
WRegan
11/2/88



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

January 31, 1989

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Public Service Electric & Gas Company
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Clyde Shiraki, Project Manager
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Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

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

Hope Creek Generating Station

cc:

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State of New Jersey
CN 411
Trenton, New Jersey 08625



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

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-354

HOPE CREEK GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 21
License No. NPF-57

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 (PSE&G) dated July 12, 1988 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. NPF-57 is hereby amended to read as follows:

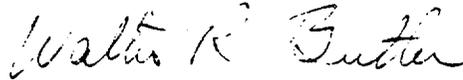
(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 21, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PSE&G shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

8902150285 890131
PDR ADOCK 05000354
P PNU

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 31, 1989

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 31, 1989

MM
PDI-2/D
McBrien
1/31/89

MM
PDI-2/PM
GRivenbark:mr
1/2/88

W
PDI-2/D
WButler
1/3/88

see note
11/10/88
ES

JH
1/12/89
JES

ATTACHMENT TO LICENSE AMENDMENT NO. 21

FACILITY OPERATING LICENSE NO. NPF-57

DOCKET NO. 50-354

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages are provided to maintain document completeness.*

<u>Remove</u>	<u>Insert</u>
xxiii	xxiii*
xxiv	xxiv
6-1	6-1
6-2	6-2
6-3	6-3
6-4	6-4
6-7	6-7*
6-8	6-8
6-9	6-9
6-10	6-10*
6-11	6-11
6-12	6-12
6-13	6-13
6-14	6-14
6-15	6-15
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6-19	6-19*
6-20	6-20

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager - Hope Creek Operations shall be responsible for overall unit 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 Hope Creek Generating Station Updated Final Safety Analysis Report and updated in accordance with 10 CFR 50.71(e).
- b. The General Manager - Hope Creek 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.

UNIT STAFF

6.2.2 The unit 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 6.2.2-1;

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator shall be in the control room;
- c. A Radiation Protection Technician* shall be on site when fuel is in the reactor;
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation; and
- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions e.g., licensed Senior Reactor Operators, licensed Reactor Operators, radiation protection technicians, equipment operators, and key maintenance personnel.
- f. The Operations Manager, Operating Engineer, Senior Nuclear Shift Supervisors, Nuclear Shift Supervisors, and Senior Operating Supervisor shall hold a senior reactor operator license. The Nuclear Control Operators shall hold a reactor operator license.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit 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 unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. 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 7 day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. 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 appropriate department manager, 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 General Manager-Hope Creek Operations or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

*The Radiation Protection Technician may be unavailable for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

HOPE CREEK

6-3

Amendment No. 21

FIGURE 6.2.1-1
DELETED

FIGURE 6.2.2-1
DELETED

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.1.2 The SORC shall be composed of the:

Chairman:	General Manager - Hope Creek Operations
Member and Vice Chairman:	Operations Manager
Member and Vice Chairman:	Technical Manager
Member:	Maintenance Manager
Member:	I & C Engineer
Member:	Systems Engineer
Member:	Radiation Protection/Chemistry Manager
Member:	Radiation Protection Engineer or Chemistry Engineer
Member:	Onsite Safety Review Engineer (or designee)

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SORC Chairman.

- a. Vice Chairmen shall be members of Station management.
- b. No more than two alternates to members shall participate as voting members in SORC activities at any one meeting.
- c. Alternate appointees will only represent their respective department.
- d. Alternates for members will not make up part of the voting quorum when the member the alternate represents is also present.

MEETING FREQUENCY

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

QUORUM

6.5.1.5 The quorum of the SORC necessary for the performance of the SORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least four members including alternates.

RESPONSIBILITIES

6.5.1.6 The SORC shall be responsible for:

- a. Review of: (1) all Station Administrative Procedures and changes thereto and (2) Newly created procedures or changes to existing

ADMINISTRATIVE CONTROLS

- 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 evaluations and recommendations to prevent recurrence to the Vice President and Chief Nuclear Officer and to 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 - Hope Creek Operations or General Manager - Nuclear Safety Review.
 - j. Review of the Facility Security Plan and implementing procedures and shall submit recommended changes to the General Manager - Nuclear Safety Review.
 - k. Review of the Facility Emergency Plan and implementing procedures and shall submit recommended changes to the General Manager - Nuclear Safety Review.
 - l. Review of the Fire Protection Program and implementing procedures and shall submit 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 to the General Manager - Nuclear Safety Review.
 - n. Review of changes to the PROCESS CONTROL MANUAL and the OFF-SITE DOSE CALCULATION MANUAL, and the Radwaste Treatment Systems.

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.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.1.8 The SORC shall:

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

RECORDS

6.5.1.9 The SORC shall maintain minutes of each SORC meeting, and copies shall be provided to the Vice President and Chief Nuclear Officer, General Manager - Nuclear Safety Review and Manager - Offsite Safety 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 - Offsite Safety Review, who is supported by at least four dedicated, full-time engineers, and the Onsite Safety Review Group, which is managed by the Onsite Safety Review Engineer and is supported by at least three dedicated, full-time engineers located onsite.

The Manager - Offsite Safety 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 Offsite Safety Review staff shall generally possess experience and competence in the areas listed in Section 6.5.2.4.1. A system of qualified reviewers from other technical organizations shall be utilized to augment expertise in the disciplines of Section 6.5.2.4.1, where appropriate. Such qualified reviewers shall meet the same qualification requirements as the Offsite Safety Review staff, and shall not have been involved with performance of the original work.

The Onsite Safety Review Engineer and staff shall meet or exceed the qualifications described in Section 4.4 of ANS 3.1 - 1981.

ADMINISTRATIVE CONTROLS

CONSULTANTS

6.5.2.3 Consultants or other technical experts shall be utilized by NSR to the extent necessary as determined by the General Manager - Nuclear Safety Review.

6.5.2.4 OFFSITE SAFETY REVIEW (OSR)

FUNCTION

6.5.2.4.1 The OSR organization 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

REVIEW

6.5.2.4.2 The OSR shall review:

- a. The safety evaluations for changes to procedures, equipment, or systems; and tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems and tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- c. Proposed changes to Technical Specifications or this Operating License;
- d. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- e. Significant operating abnormalities or deviations from normal and expected performance of facility equipment that affect nuclear safety;

ADMINISTRATIVE CONTROLS

- f. All REPORTABLE EVENTS.
- g. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- h. Reports and meeting minutes of the SORC.

AUDITS

6.5.2.4.3 Audits of facility activities shall be performed under the cognizance of the OSR. These audits shall encompass:

- 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, 10 CFR Part 50, at least once per 24 months;
- 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 the implementing procedures at least once per 24 months;
- i. The fire protection and loss prevention program implementation at least once per 12 months utilizing either a qualified off-site licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least once per 36 months; and
- j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;

ADMINISTRATIVE CONTROLS

- l. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months; and,
- m. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

The above audits shall be conducted by the Nuclear Quality Assurance Department or an independent consultant. Audit plans and final audit reports shall be reviewed by the OSR prior to issuance.

RECORDS

6.5.2.4.4 Records of OSR activities shall be maintained. Reports of reviews and audits shall be prepared and distributed as indicated below:

- a. The results of reviews performed pursuant to Section 6.5.2.4.2 shall be reported to the Vice President - Nuclear at least monthly.
- b. Audit reports prepared pursuant to Specification 6.5.2.4.3 shall be forwarded by the auditing organization to the Vice President and Chief Nuclear Officer and to the management positions responsible for the areas audited (1) within 30 days after completion of the audit for those audits conducted by the Nuclear Quality Assurance Department, and (2) within 60 days after completion of the audit for those audits conducted by an independent consultant.

6.5.2.5 ONSITE SAFETY REVIEW GROUP (SRG)

6.5.2.5.1 The SRG shall function to provide: the review of plant design and operating experience for potential opportunities to improve plant safety; 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

6.5.2.5.2 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 which may indicate areas for improving plant safety.
- b. Review of selected facility features, equipment, and systems.
- c. Review of selected procedures and plant activities including maintenance, modification, operational problems, and operational analysis.

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- 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.

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.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 All programs and procedures required by Technical Specification 6.8 and changes thereto, and any other proposed procedures or changes thereto, which affect plant nuclear safety as determined by the General Manager - Hope Creek Operations, other than editorial or typographical changes, shall be reviewed as follows:

PROCEDURE RELATED DOCUMENTS

6.5.3.2 Procedures, Programs 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 area affected 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 General Manager - Hope Creek Operations. Each station Department Manager shall be responsible for a pre-designated class of procedures. The General Manager - Hope Creek Operations shall approve Station Administrative Procedures, Security Plan implementing procedures and Emergency Plan implementing procedures.
- 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's 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 6.5.3.2.a above shall be approved by the SORC Chairman and designated as a Station Qualified Reviewer. A system of Station Qualified Reviewers shall be maintained by the SORC Chairman. Each review shall include a written determination of whether or not additional

* Not responsible for sign-off function.

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cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate designated review personnel. The Station Qualified Reviewers shall meet or exceed the qualifications described in Section 4.4 of ANS 3.1, 1981.

- 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 10 CFR 50.59, NRC approval of items involving unreviewed safety questions or requiring Technical Specification changes shall be obtained prior to implementation.

NON-PROCEDURE RELATED DOCUMENTS

6.5.3.3 Tests or experiments, 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 - Hope Creek Operations. Pursuant to 10 CFR 50.59, 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 - Hope Creek 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 pursuant to the requirements of Section 50.72 to 10 CFR Part 50 and a report submittal pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the SORC, and the results of this review shall be submitted to the 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 NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President and Chief Nuclear Officer and the General Manager - NSR shall be notified within 24 hours.

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- b. 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 unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. 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 30 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. The applicable procedures required to implement the requirements of NUREG-0737 and supplements thereto.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environment monitoring.

6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed and approved in accordance with specification 6.5.1.6 or 6.5.3, as appropriate, prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 On-the-Spot changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Reactor Operator license on the unit affected; and

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PROCEDURES AND PROGRAMS (Continued)

- c. The change is documented and receives the same level of review and approval as the original procedure under Specification 6.5.3.2a within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the HPCI, CS, RHR, RCIC, Containment Hydrogen Recombiner, H₂/O₂ analyzer, Post-Accident Sampling, Control Rod Drive Hydraulic (Scram Discharge portion) systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and
2. A service pressure leak test for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis, and
3. Provisions for maintenance of sampling and analysis equipment.

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after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.7 Routine radioactive release reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

The radioactive effluent release reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The radioactive effluent release report to be submitted within 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing of wind speed, wind direction, and atmospheric stability, and precipitation (if measured) on magnetic tape, or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY (Figure 5.1.1-1) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The historical annual average meteorology or the meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents (as determined by sampling frequency and measurement) shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM). The Semiannual Radioactive Effluent Release Report shall identify those radiological environmental sample parameters and locations where it is not possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In addition, the cause of the unavailability of samples for the pathway and the new location(s) for obtaining replacement samples should be identified. The report should also include a revised figure(s) and table(s) for the ODCM reflecting the new location(s).

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SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT (Continued)

The radioactive effluent release report to be submitted within 60 days after January 1, of each year shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources (including doses from primary effluent pathways and direct radiation) for the previous 12 consecutive months to show conformance with 40 CFR 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1.

The radioactive effluents release shall include the following information for each class of solid waste (as defined by 10 CFR 61) shipped offsite during the report period:

- a. Container volume,
- b. Total curie quantity (specify whether determined by measurement or estimate),
- c. Principal radionuclide (specify whether determined by measurement or estimate),
- d. Type of waste (e.g., spent resin, compact dry waste, evaporator bottoms),
- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent (e.g., cement, urea formaldehyde).

The radioactive effluent release reports shall include unplanned releases from the site to the UNRESTRICTED AREA of radioactive materials in gaseous and liquid effluents on a quarterly basis.

The radioactive effluent release reports shall include any changes to the PROCESS CONTROL PROGRAM (PCP), OFFSITE DOSE CALCULATION MANUAL (ODCM) or radioactive waste systems made during the reporting period.

MONTHLY OPERATING REPORTS

6.9.1.8 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office no later than the 15th of each month following the calendar month covered by the report.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

6.9.3 Violations of the requirements of the fire protection program described in the Final Safety Analysis Report which would have adversely affected the ability to achieve and maintain safe shutdown in the event of a fire shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator of the Regional Office of NRC via the Licensee Event Report System within 30 days.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 21 TO FACILITY OPERATING LICENSE NO. NPF-57

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

1.0 INTRODUCTION

By letter dated July 12, 1988, Public Service Electric & Gas Company proposed several changes to Section 6.0 of the Technical Specifications (TS). The first change would remove Figure 6.2-1, Offsite Organization, and Figure 6.2-2, Unit Organization, and replace them with a narrative description of the offsite and onsite organizations functional requirements in TS 6.2.1 and unit staff qualifications in 6.2.2. Guidance for this proposed change to the TS was provided to licensees and applicants by Generic Letter 88-06, dated March 22, 1988. On December 5, 1988 the licensee clarified position titles for this amendment.

The second change would replace the reference to the Vice President-Nuclear, contained in TS 6.1.2, with the new position title. For consistency, TS 6.5.1.6f, 6.5.1.6m, 6.5.1.8b, 6.5.1.9, 6.5.2.4.3g, 6.5.2.4.4b, 6.5.2.6, 6.6.1b, 6.7.1a, and 6.7.1c would also replace the title, Vice President-Nuclear, with the new position title.

The third and final change affects TS 6.9.2 and 6.9.3 concerning special reports. It would require that special reports be submitted to the United States Nuclear Regulatory Commission (USNRC) Document Control Desk with a copy to the Regional Administrator.

2.0 BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 6.2.1 and 6.2.2 of the administrative control requirements have referenced offsite and unit (onsite) organization charts that are provided as figures to these sections. On a plant specific basis, these organization charts have been provided by applicants and included in the TS issued with the operating license. Subsequent restructuring of either the offsite or unit organizations, following the issuance of an operating license, has required licensees to submit a license amendment for NRC approval to reflect the desired changes in these organizations. As a consequence, organizational changes have necessitated the need to request an amendment of the operating license.

Because of these limitations on organizational structure, the nuclear industry has highlighted this as an area for improvement in the TS. The Shearon Harris licensee proposed changes to remove organization charts from its TS under the lead-plant concept that included the endorsement of the proposed changes by the Westinghouse Owners Group. In its review of the Shearon Harris proposal, the staff concluded that most of the essential elements of offsite and onsite organization charts are captured by other regulatory requirements, notably Appendix B to 10 CFR 50. However, there were aspects of the organizational structure that are important to ensure that the administrative control requirements of 10 CFR 50.36 would be met and that would not be retained with the removal of the organization charts. The applicable regulatory requirements are those administrative controls that are necessary to ensure safe operation of the facility. Therefore, those aspects of organization charts for Shearon Harris that were essential for conformance with regulatory requirements were added (1) to Specification 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to Specification 6.2.2 to define qualification requirements of the unit staff.

By letter dated January 27, 1988, the staff issued Amendment No. 3 to Facility Operating License NFP-63 for the Shearon Harris Nuclear Power Plant that incorporated these changes to their TS. Subsequently the staff developed guidance on an acceptable format for license amendment requests to remove the organization charts from TS. Generic Letter 88-06 provided this guidance to all power reactors.

3.0 EVALUATION

The licensee's first change to its TS is in accordance with the guidance provided by Generic Letter 88-06 and addressed the items listed below.

- (1) Specifications 6.2.1 and 6.2.2 were revised to delete the references to Figures 6.2-1 and 6.2-2 that were removed from the TS.
- (2) Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.2.1, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements shall be documented in the Hope Creek Updated FSAR.
- (3) The organization chart for the unit staff does not stipulate senior reactor operator or reactor operator license qualified positions. Hence, this is not an applicable consideration related to the removal of the organization charts from the TS for their plant.
- (4) Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee has confirmed that this documentation currently exists in the Hope Creek Updated FSAR.

- (5) No specifications, other than those noted in item (1) above, include references to the figures of the organization charts that are being removed from TS for their plant. Hence, this is not applicable consideration, with regard to the need to redefine referenced requirements as a result of the removal of these figures.

On the basis of its review of the above items, the staff concludes that the licensee has provided an acceptable response to these items as addressed in the NRC guidance on removing organization charts from the administrative control requirements of the TS. Furthermore, the staff finds that this change is consistent with the staff's generic finding on the acceptability of such changes as noted in Generic Letter 88-06. Accordingly, the staff finds the proposed change to be acceptable.

The second change merely updates the title of Vice President-Nuclear to Vice President and Chief Nuclear Officer.

The third change revises the TS special reports addressees requirement to make it consistent with the current requirements of 10 CFR 50.4 and is therefore acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that the amendment involved no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets 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 these amendments.

5.0 CONCLUSION

The Commission made a proposed determination that the amendment involve no significant hazards consideration which was published in the Federal Register (53 FR 32294) on August 24, 1988. The Commission consulted with the State of New Jersey. No public comments were received and the State of New Jersey did not have any comments.

On the basis of the considerations discussed above, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Thomas G. Dunning and George Rivenbark

Dated: January 31, 1989