



August 22, 2001

L-2001-192
10 CFR 50.36
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Corporate Officer Title Change

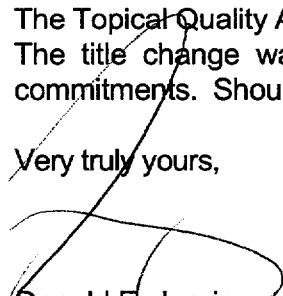
In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-67 and NPF-16 be amended to modify St. Lucie Units 1 and 2 Technical Specifications (TS) Section 6.0, "Administrative Controls," respectively. The purpose of these amendments is to change the title of the corporate executive responsible for overall plant nuclear safety in each unit's TS, Section 6.0, from "President-Nuclear Division" to "Chief Nuclear Officer."

FPL has determined that the proposed license amendments do not involve a significant hazard pursuant to 10 CFR 50.92. A description of the requested amendments is provided in Attachment 1. The No Significant Hazards Consideration Determination in support of the proposed TS changes and the Environmental Impact Evaluation are provided in Attachment 2. Attachments 3 and 4 provide the marked up TS pages showing the proposed changes.

The St. Lucie Facility Review Group and the FPL Company Nuclear Review Board have reviewed the proposed license amendments. In accordance with 10 CFR 50.91(b)(1), a copy of the proposed license amendments are being forwarded to the State Designee for the State of Florida.

The Topical Quality Assurance Report was revised to reflect the organizational title change. The title change was determined not to reduce the FPL Quality Assurance Program commitments. Should there be any questions, please contact us.

Very truly yours,


Donald E. Jernigan
Vice President
St. Lucie Plant

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant
Mr. William A. Passetti, Florida Department of Health

Moog
A001

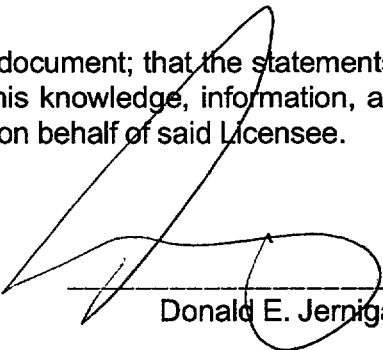
St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
L-2001-192 Page 2

STATE OF FLORIDA)
)
COUNTY OF ST. LUCIE) ss.

Donald E. Jernigan being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power & Light Company, the Licensee herein;

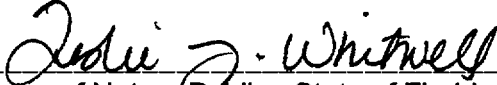
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.




Donald E. Jernigan

STATE OF FLORIDA
COUNTY OF ST. LUCIE

Sworn to and subscribed before me
this 20 day of August, 2001
by Donald E. Jernigan, who is personally known to me.



Name of Notary Public - State of Florida

 Leslie J. Whitwell
MY COMMISSION # DD020212 EXPIRES
May 12, 2005
BONDED THRU TROY FAIN INSURANCE, INC.

(Print, type or stamp Commissioned Name of Notary Public)

DESCRIPTION OF PROPOSED LICENSE AMENDMENTS

1.0 Introduction

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-67 and NPF-16 be amended to modify St. Lucie Units 1 and 2 Technical Specifications (TS) Section 6.0, "Administrative Controls," respectively. The purpose of these amendments is to change the title of the corporate executive responsible for overall plant nuclear safety in each unit's TS, Section 6.0, from "President-Nuclear Division" to "Chief Nuclear Officer."

2.0 Background

On June 4, 2001, FPL appointed a Senior Vice President in charge of nuclear operations. The Senior Vice President in charge of nuclear operations is an officer of FPL. The Senior Vice President has corporate responsibility for overall plant nuclear safety and reports to the Chief Executive Officer of FPL Group. Previous to this, the corporate executive responsible for overall plant nuclear safety was designated as "President-Nuclear Division" in the St. Lucie Units 1 and 2 TS, Section 6.0.

The purpose of these amendments is to change the title of the corporate executive responsible for overall plant nuclear safety in the St. Lucie Units 1 and 2 TS, Section 6.0, from "President-Nuclear Division" to "Chief Nuclear Officer." The proposed change eliminates the specific reference to an organizational title "President-Nuclear Division," and substitutes it with the generic organizational position title of "Chief Nuclear Officer." The Senior Vice President in charge of nuclear operations meets all the requirements of the title of "Chief Nuclear Officer" as delineated in the St. Lucie Units 1 and 2 TS, Section 6.0. FPL's Topical Quality Assurance Report (TQAR) has been changed, consistent with the requirements of 10 CFR 50.54 (a) (3), to substitute "President-Nuclear Division" with the generic organizational position title of "Chief Nuclear Officer." Use of the generic organizational position title of "Chief Nuclear Officer" in the TS will preclude the need for future amendments to the TS in response to potential future corporate title changes for the corporate executive responsible for overall plant nuclear safety.

3.0 Description and Justification of Proposed Change

The following changes as shown in Attachments 3 and 4 are proposed:

1. Revise TS Section 6.2.1 b. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
2. Revise TS Section 6.5.1.6 e. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.

3. Revise TS Section 6.5.1.6 k. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
4. Revise TS Section 6.5.1.7 c. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
5. Revise TS Section 6.5.1.8 to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
6. Revise TS Section 6.5.2.2 to replace **President-Nuclear Division** with **Chief Nuclear Officer** in two places.
7. Revise TS Section 6.5.2.8 e. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
8. Revise Unit 1 TS Section 6.5.2.9 and Unit 2 TS Section 6.5.2.10 to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
9. Revise Unit 1 TS Section 6.5.2.10 a. and Unit 2 TS Section 6.5.2.11 a. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
10. Revise Unit 1 TS Section 6.5.2.10 b. and Unit 2 TS Section 6.5.2.11 b. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
11. Revise Unit 1 TS Section 6.5.2.10 c. and Unit 2 TS Section 6.5.2.11 c. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
12. Revise TS Section 6.6.1 b. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
13. Revise TS Section 6.7.1 a. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.
14. Revise TS Section 6.7.1 c. to replace **President-Nuclear Division** with **Chief Nuclear Officer**.

Justification:

The proposed changes are administrative in nature and result in no change in responsibilities or accountabilities as defined in Section 6.0 of the St. Lucie Units 1 and 2 TS. The Senior Vice President in charge of nuclear operations continues to be responsible for the overall plant nuclear safety and meets all other requirements of the "Chief Nuclear Officer" as will be defined in Section 6.0 of the St. Lucie Units 1 and 2 TS and the TQAR. FPL's Senior Vice President in charge of nuclear operations is an officer

St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
L-2001-192 Attachment 1 Page 3

of FPL and has overall responsibility for the Nuclear Division's activities including corporate responsibility for overall plant nuclear safety. Reporting to the Chief Nuclear Officer are: the Vice President - Turkey Point Plant, Vice President - St. Lucie Plant, Director - Nuclear Assurance, Vice President - Nuclear Engineering, Manager Nuclear Plant Support Services, and Manager Nuclear Financial and Information Services. The Senior Vice President reports to the Chief Executive Officer of FPL Group. Thus, the Senior Vice President is the "Chief Nuclear Officer" as is defined in the St. Lucie Units 1 and 2 TS and the FPL TQAR, with no changes in administrative responsibilities or accountabilities as described in Section 6.0 of the St. Lucie Units 1 and 2 TS.

The proposed changes are consistent with the requirements of 10 CFR 50.36.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Introduction

Description of the requested amendments: The purpose of these amendments is to change the title of the corporate executive responsible for overall plant nuclear safety in the St. Lucie Units 1 and 2 Technical Specifications (TS), Section 6.0, from "President-Nuclear Division" to "Chief Nuclear Officer," respectively. The proposed changes eliminate the specific reference to an organizational title, "President-Nuclear Division," and substitutes it with the generic organizational title of "Chief Nuclear Officer." Use of the generic title of "Chief Nuclear Officer" in the TS will preclude the need for potential future amendments to the TS in response to future corporate title changes for the executive responsible for overall plant nuclear safety.

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazard consideration exist (10 CFR 50.92 (c)). A proposed amendment to an operating license for a facility involves no significant hazard consideration, if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed below for the proposed amendment.

Discussion

(1) Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendments are administrative in nature, changing the title of the corporate executive responsible for overall plant nuclear safety in St. Lucie Units 1 and 2 TS, and would not involve a significant increase in the probability or consequences of an accident previously evaluated. These amendments do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect TS that preserve safety analysis assumptions. Therefore, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

(2) Operation of the facility in accordance with the proposed amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes to the TS are administrative in nature, changing the title of the corporate executive responsible for overall plant nuclear safety in St. Lucie Units 1 and 2

TS, and would not create the possibility of a new or different kind of accident from any previously evaluated. The proposed amendments will not change the physical plant or the modes of plant operation defined in the facility operating license. No new failure mode is introduced due to the administrative changes since the proposed changes do not involve the addition or modification of equipment, nor do they alter the design or operation of affected plant systems, structures, or components. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

The proposed changes are administrative in nature, changing the title of the corporate executive responsible for overall plant nuclear safety in the St. Lucie Units 1 and 2 TS, and would not reduce any of the margins of safety. The operating limits and functional capabilities of the affected systems, structures, and components remain unchanged by the proposed amendments. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Conclusion

Based on the above, FPL has determined that the proposed amendments request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, (3) involve a significant reduction in a margin of safety; and therefore, the proposed change does not involve a significant hazard consideration as defined in 10 CFR 50.92.

Environmental Consideration

10 CFR 51.22(c)(10) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. Issuance of an amendment to a permit or license pursuant to Part 50 is eligible for categorical exclusion if (1) it changes surety, insurance, and/or indemnity requirements, or (2) it changes recordkeeping, reporting, or administrative procedures or requirements.

The proposed license amendments revise the St. Lucie Units 1 and 2 facility operating licenses to change the title of the corporate executive responsible for overall plant nuclear safety in the St. Lucie Units 1 and 2 TS, Section 6.0, from "President-Nuclear Division" to "Chief Nuclear Officer." The proposed license amendments change administrative requirements and therefore, meet the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). FPL has determined, pursuant to 10 CFR 51.22(b), that an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendments.

St. Lucie Unit 1

Technical Specification Page Changes

Page 6-1

Page 6-7

Page 6-8

Page 6-9

Page 6-11

Page 6-12

Page 6-13

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The Plant General Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.2 The 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 Site Vice President, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

- 6.2.1 An onsite and an offsite organization shall be established for unit operation and corporate management. This onsite and offsite organization shall include the 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. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3).
- b. The ~~President - Nuclear Division~~ shall be responsible for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
- c. The Plant General Manager shall be responsible for overall safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.
- e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the Health Physics Supervisor shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

chief nuclear officer

6.0 ADMINISTRATIVE CONTROLS

ALTERNATES

- 6.5.1.3 All alternate members shall be appointed in writing by the FRG Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in FRG activities at any one time.

MEETING FREQUENCY

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

QUORUM

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

RESPONSIBILITIES

- 6.5.1.6 The Facility Review Group shall be responsible for:
- a. Review of (1) all new procedures required by Specification 6.8 and all procedure changes that require a written safety evaluation, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Plant General Manager to affect nuclear safety.
 - 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 unit systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the ~~President Nuclear Division~~ and to the Chairman of the Company Nuclear Review Board.
 - f. Review of all REPORTABLE EVENTS. *Chief nuclear officer*
 - g. Review of unit operations to detect potential nuclear safety hazards.
 - h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Plant General Manager or the Company Nuclear Review Board.

6.0 ADMINISTRATIVE CONTROLS

- i. Not Used.
- j. Not Used.
- k. Review of every unplanned on-site release of radioactive material 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 President Nuclear Division and to the Company Nuclear Review Board.
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL and RADWASTE TREATMENT SYSTEMS.
- m. Review and documentation of judgment concerning prolonged operation in bypass, channel trip, and/or repair of defective protection channels of process variables placed in bypass since the last FRG meeting.
- n. Review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board.

AUTHORITY

6.5.1.7 The Facility Review Group shall:

- a. Recommend in writing to the Plant General Manager, approval or disapproval of items considered under Specifications 6.5.1.6.a through d above.
- b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6.a, b, d, and e above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the President Nuclear Division and the Company Nuclear Review Board of disagreement between the FRG and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.

RECORDS

6.5.1.8 The Facility Review Group shall maintain written minutes of each FRG meeting that, at a minimum, document the results of all FRG activities performed under the responsibility and authority provisions of these Technical Specifications. Copies shall be provided to the Plant General Manager, President Nuclear Division and the Chairman of the Company Nuclear Review Board.

Chief nuclear officer

ADMINISTRATIVE CONTROLS

6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)

FUNCTION

6.5.2.1 The Company Nuclear Review Board 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. instrument and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The ~~President - Nuclear Division~~ shall appoint, in writing, a minimum of five members to the CNRB and shall designate from this membership, in writing, a Chairman. The membership shall function to provide independent review and audit in the areas listed in Specification 6.5.2.1. The Chairman shall meet the requirements of ANSI/ANS-3.1-1987, Section 4.7.1. The members of the CNRB shall meet the educational requirements of the ANSI/ANS-3.1-1987, Section 4.7.2, and have at least 5 years of professional level experience in one or more of the fields listed in Specification 6.5.2.1. CNRB members who do not possess the educational requirements of ANSI/ANS-3.1-1987, Section 4.7.2 (up to a maximum of 2 members) shall be evaluated, and have their membership approved and documented, in writing, on a case-by-base basis by the ~~President - Nuclear Division~~, considering the alternatives to educational requirements of ANSI/ANS-3.1-1987, Sections 4.1.1 and 4.1.2.

Chief nuclear officer

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the CNRB Chairman to serve on temporary basis; however, no more than two alternates shall participate as voting members in CNRB activities at any one time.

ADMINISTRATIVE CONTROLS

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

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the CNRB. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the entire unit staff.
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50.
- e. Any other area of unit operation considered appropriate by the CNRB or the President - Nuclear Division
- f. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
- g. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- h. The radiological environmental monitoring program and the results thereof.
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for dewatering of radioactive bead resin.

Chief nuclear officer

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.2.9 The CNRB shall report to and advise the ~~President - Nuclear Division~~ on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of CNRB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each CNRB meeting shall be prepared, approved and forwarded to the ~~President - Nuclear Division~~ within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 above, shall be prepared, approved and forwarded to the ~~President - Nuclear Division~~ within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the ~~President - Nuclear Division~~ and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the FRG, and the results of the review shall be submitted to the CNRB, and the ~~President - Nuclear Division~~.

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 ~~President - Nuclear Division~~ and the CNRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the FRG. 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.

Chief nuclear officer

6.0 ADMINISTRATIVE CONTROLS

- c. The Safety Limit Violation Report shall be submitted to the Commission, the CNRB, and the ~~President - Nuclear Division~~ *chief nuclear officer* within 14 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, and those required for implementing the requirements of NUREG 0737.
 - b. Refueling operations.
 - c. Surveillance and test activities of safety-related equipment.
 - d. Not Used.
 - e. Not Used.
 - f. Fire Protection Program implementation.
 - g. PROCESS CONTROL PROGRAM implementation.
 - h. OFFSITE DOSE CALCULATION MANUAL implementation.
 - i. Quality Control Program for effluent monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974.
 - j. Quality Control Program for environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 REVIEW AND APPROVAL OF PROCEDURES

Each new procedure of Specification 6.8.1a. through i. above shall be independently reviewed by an individual or group from the appropriate discipline(s), and shall be reviewed by the FRG. New procedures shall be approved by the Plant General Manager or individuals designated in writing by the Plant General Manager prior to implementation. Each procedure of Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures.

St. Lucie Unit 2

Technical Specification Page Changes

Page 6-1
Page 6-8
Page 6-9
Page 6-10
Page 6-12
Page 6-12a
Page 6-13

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The Plant General Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.2 The 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 Site Vice President, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

- 6.2.1 An onsite and an offsite organization shall be established for unit operation and corporate management. This onsite and offsite organization shall include the 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. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3).
 - b. ~~The President, Nuclear Division~~ shall be responsible for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
 - c. The Plant General Manager shall be responsible for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
 - d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.
 - e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the Health Physics Supervisor shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

chief nuclear officer

6.0 ADMINISTRATIVE CONTROLS

MEETING FREQUENCY

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

QUORUM

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

RESPONSIBILITIES

6.5.1.6 The Facility Review Group shall be responsible for:

- a. Review of (1) all new procedures required by Specification 6.8 and all procedure changes that require a written safety evaluation, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Plant General Manager to affect nuclear safety.
- 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 unit systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the ~~President Nuclear Division~~ and to the Chairman of the Company Nuclear Review Board.
- f. Review of all REPORTABLE EVENTS. *chief nuclear officer*
- g. Review of unit operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Plant General Manager or the Company Nuclear Review Board.
- i. Not Used.
- j. Not Used.

6.0 ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- k. Review of every unplanned on-site release of radioactive material 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 ~~President Nuclear Division~~ and to the Company Nuclear Review Board.
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL and RADWASTE TREATMENT SYSTEMS.
- m. Review and documentation of judgment concerning prolonged operation in bypass, channel trip, and/or repair of defective protection channels of process variables placed in bypass since the last FRG meeting.
- n. Review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board.

AUTHORITY

6.5.1.7 The Facility Review Group shall:

- a. Recommend in writing to the Plant General Manager approval or disapproval of items considered under Specifications 6.5.1.6a. through d. and m. above.
- b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6a, b, d, and e above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the ~~President Nuclear Division~~ and the Company Nuclear Review Board of disagreement between the FRG and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.

chief nuclear officer

RECORDS

6.5.1.8 The Facility Review Group shall maintain written minutes of each FRG meeting that, at a minimum, document the results of all FRG activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Plant General Manager, ~~President Nuclear Division~~ and the Chairman of the Company Nuclear Review Board.

6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)

FUNCTION

6.5.2.1 The Company Nuclear Review Board 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

ADMINISTRATIVE CONTROLS

FUNCTION (Continued)

- e. instrument and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The ~~President - Nuclear Division~~ shall appoint, in writing, a minimum of five members to the CNRB and shall designate from this membership, in writing, a Chairman. The membership shall function to provide independent review and audit in the areas listed in Specification 6.5.2.1. The Chairman shall meet the requirements of ANSI/ANS-3.1-1987, Section 4.7.1. The members of the CNRB shall meet the educational requirements of the ANSI/ANS-3.1-1987, Section 4.7.2, and have at least 5 years of professional level experience in one or more of the fields listed in Specification 6.5.2.1. CNRB members who do not possess the educational requirements of ANSI/ANS-3.1-1987, Section 4.7.2 (up to a maximum of 2 members) shall be evaluated, and have their membership approved and documented, in writing, on a case-by-base basis by the ~~President - Nuclear Division~~ considering the alternatives to educational requirements of ANSI/ANS-3.1-1987, Sections 4.1.1 and 4.1.2.

Chief nuclear officer

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the CNRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNRB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the CNRB Chairman to provide expert advice to the CNRB.

MEETING FREQUENCY

6.5.2.5 The CNRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter and as convened by the CNRB Chairman or his designated alternate.

QUORUM

6.5.2.6 The quorum of the CNRB necessary for the performance of the CNRB review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least a majority of CNRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

ADMINISTRATIVE CONTROLS

AUDITS (continued)

- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50.
- e. Any other area of unit operation considered appropriate by the CNRB or the ~~President - Nuclear Division~~.
- f. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
- g. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- h. The radiological environmental monitoring program and the results thereof.
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for dewatering of radioactive bead resin.

Chief nuclear officer

TECHNICAL REVIEW RESPONSIBILITIES

- 6.5.2.9 The technical review responsibilities under the cognizance of the CNRB shall encompass:
- a. Plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources that may indicate areas for improving plant safety;
 - b. Plant operations, modifications, maintenance, and surveillance to verify independently that these activities are performed safely and correctly and that human errors are reduced as much as practical;
 - c. Internal and external operational experience information that may indicate areas for improving plant safety; and
 - d. Making detailed recommendations to the Chairman - CNRB and plant management for revising procedures, equipment modifications or other means of improving nuclear safety and plant reliability.

AUTHORITY

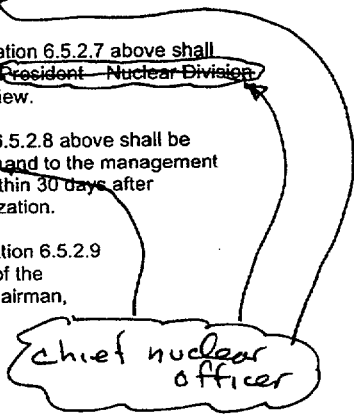
- 6.5.2.10 The CNRB shall report to and advise the ~~President - Nuclear Division~~ on those areas of responsibility specified in Specifications 6.5.2.7, 6.5.2.8, and 6.5.2.9.

ADMINISTRATIVE CONTROLS

RECORDS

6.5.2.11 Records of CNRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each CNRB meeting shall be prepared, approved, and forwarded to the ~~President - Nuclear Division~~ within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 above shall be prepared, approved, and forwarded to the ~~President - Nuclear Division~~ within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above shall be forwarded to the ~~President - Nuclear Division~~ and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.
- d. Technical reviews encompassed by Specification 6.5.2.9 above shall be prepared, maintained and a report of the activities forwarded each calendar month to the Chairman, CNRB.



ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENTS ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the FRG, and the results of this review shall be submitted to the CNRB, and the ~~President - Nuclear Division~~.

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 ~~President - Nuclear Division~~ and the CNRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the FRG. 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.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the CNRB, and the ~~President - Nuclear Division~~ within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

Chief nuclear officer

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, and those required for implementing the requirements of NUREG 0737.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.
- d. Not Used.
- e. Not Used.