



444 South 16th Street Mall
Omaha NE 68102-2247

November 21, 2001
LIC-01-0081

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk), "Application for Amendment of Facility Operating License No. DPR-40," dated May 15, 2001 (LIC-01-0027)

SUBJECT: Fort Calhoun Station Unit 1 License Amendment Request, "Administrative Controls and Procedures"

Pursuant to 10 CFR 50.90, the Omaha Public Power District (OPPD) is submitting this "Application for Amendment of Facility Operating License" to revise the Fort Calhoun Station Unit No. 1 Technical Specifications (TS). The changes requested are administrative revisions to Technical Specification 5.8 and supplements the application submitted in Reference 2.

The Attachment contains a description of these changes and the replacement pages reflecting the requested changes to Technical Specification 5.8 that differ from Reference 2. These changes provide a closer alignment of the "Administrative Controls, Procedures," Section with Improved Standard Technical Specifications as described in NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants." OPPD has reviewed these revisions and determined that they are purely administrative or editorial in nature.

The basis and the conclusions reached in the Discussion, Justification and No Significant Hazards Consideration provided in the May 15, 2001 submittal (Reference 2) remain valid and therefore are not resubmitted.

The Attachment contains the revised pages to replace those in the markup reflecting the proposed changes to the Technical Specifications provided in the May 15, 2001 submittal (Reference 2).

A001

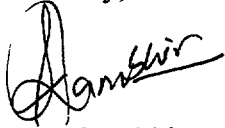
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OPPD respectfully requests 30 days to implement the amendment following NRC approval.

I declare under penalty of perjury that the foregoing is true and correct. (Executed on November 21, 2001)

If you have any questions or require additional information, please contact Dr. R. L. Jaworski at (402) 533-6833.

Sincerely,



S. K. Gambhir
Division Manager
Nuclear Operations

SGK/RRL/rrl

Attachments: 1. Requested Changes to Technical Specifications
 2. Technical Specifications Markup
 3. Technical Specifications Final Draft

c: E. W. Merschoff, NRC Regional Administrator, Region IV
 A. B. Wang, NRC Project Manager
 W. C. Walker, NRC Senior Resident Inspector
 B. E. Casari, Director - Environmental Health Division, State of Nebraska
 Winston & Strawn

LIC-01-0081
Attachment 1

Attachment
Requested Changes
to
Technical Specifications

Discussion of changes made to original submittal (05/15/01, LIC-01-0027).

CHANGE	SPECIFICATION OLD/NEW	DESCRIPTION OF CHANGE (FROM ORIGINAL SUBMITTAL - LIC-01-0027)
1	5.2.d	<p>Returned to original Technical Specification (pre license amendment request) statement.</p> <p>Justification: As the entire Section 5.8 is not being relocated to the FCS Quality Assurance Program (QAP), it is no longer necessary to reference the FCS QAP. The change discussed in the original submittal is no longer necessary. (Editorial)</p>
2	5.2.e	<p>Changed "Department Manager" to "department manager," i.e., made lower case.</p> <p>Justification: This is not the title of any specific position and represents the generic department manager. This change is administrative. (Editorial)</p> <p>Clarification of original change: As addressed in TSTF-258, Revision 4, the term "periodically" as used in this section shall be based upon plant experience (i.e., more frequent reviews conducted during shutdown/refueling when a lot of overtime can be expected, versus less frequent reviews at times with little anticipated overtime during which the reviews would not exceed the quarterly frequency).</p>
3	5.8.1./---	<p>Deleted discussion for establishing, implementing, and maintaining procedures in accordance with the Quality Assurance Plan. Also, this section will become a header for the new sections 5.8.1.a through d.</p> <p>Justification: The addition does not impose any new requirement and provides conformity with the Standard Technical Specifications. Thus, the change is administrative only since no new requirements are being introduced.</p>

CHANGE	SPECIFICATION OLD/NEW	DESCRIPTION OF CHANGE (FROM ORIGINAL SUBMITTAL - LIC-01-0027)
4	--/5.8.1.a	<p>Added discussion for establishing, implementing and maintaining applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, 1978.</p> <p>Justification: The addition does not impose any new requirement and provides conformity with the Standard Technical Specifications. Thus, the change is administrative only since no new requirements are being introduced.</p>
5	--/5.8.1.b	<p>Added requirement for establishing, implementing, and maintaining emergency operating procedures needed to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33.</p> <p>Justification: The requirement for establishing, implementing and maintaining emergency operating procedures is required by Generic Letter 82-33. Adding this provision enhances the Specification and conforms to NRC guidance and provides conformity with the Standard Technical Specifications. The change is administrative only since no new requirements are being introduced.</p>
6	5.8.5/5.8.1.c	<p>Relocated discussion for establishing, implementing, and maintaining Fire Protection Program written procedures.</p> <p>Justification: The relocation does not impose any new requirement and provides conformity with the Standard Technical Specifications. Thus, the change is administrative.</p>
7	---/5.8.1.d	<p>Added requirement for establishing, implementing, and maintaining procedures for all programs specified in Technical Specifications 5.11 through 5.19.</p> <p>Justification: Adding the requirement for establishing, implementing, and maintaining procedures for the listed programs enhances use of the Specification and conforms to NRC guidance. Although not identical to the wording in Standard Technical Specifications, the intent is met and does not require renumbering the referenced sections. The addition does not impose any new requirement and provides conformity with the Standard Technical Specifications. Thus, the change is administrative.</p>

CHANGE	SPECIFICATION OLD/NEW	DESCRIPTION OF CHANGE (FROM ORIGINAL SUBMITTAL - LIC-01-0027)
8	5.8.2/---	<p>This Section was relocated to FCS Quality Assurance Program in original license amendment request (LIC-01-0027) and is described here for reference purposes.</p> <p>Justification: This has not changed from the original license amendment request and is noted only for reference.</p>
9	5.8.3/ 5.8.2	<p>Renumbered from 5.8.3 to 5.8.2 due to deletion (relocation to QAP) discussed in change 8.</p> <p>Justification: This change is administrative. (Editorial)</p>
10	5.8.3.c./ 5.8.2.c	<p>Changed "Qualified Reviewer" and "Department Head" to "qualified reviewer" and "department head" respectively, i.e., place in lower case. Also, changed "Manager – Fort Calhoun Station" to "plant manager" based on the justification provided in LIC-01-0027.</p> <p>Justification: This is not a specific title and represents the generic position. Change to "plant manager" is consistent with the request in LIC-01-0027. This change is administrative. (Editorial)</p>
11	5.8.4/ 5.8.3	<p>Deleted reference to section 5.8.2 as this section has been relocated to the Quality Assurance Program. Renumbered from 5.8.4 to 5.8.3 due to deletion discussed in change 8.</p> <p>Justification: This change is administrative. (Editorial)</p>
12	5.8.5	<p>Relocated to 5.8.1.c. (See change 6. These are one and the same changes.)</p> <p>Justification: This change is administrative. (Editorial)</p>
13	5.17.c	<p>Changed reference from "the Quality Assurance Program" which was requested in LIC-01-0027, to "Technical Specification 5.8.2." This change requires the reference to TS 5.8.3 to be corrected to account for renumbering noted above in change 9.</p> <p>Justification: As the entire Section 5.8 is not being relocated to the FCS Quality Assurance Program (QAP), it is no longer necessary to reference the FCS QAP. Corrected reference to TS 5.8.3 to account for renumbering noted above in change 9. Thus, the only change is 5.8.3 becomes 5.8.2. This change is administrative. (Editorial)</p>

CHANGE	SPECIFICATION OLD/NEW	DESCRIPTION OF CHANGE (FROM ORIGINAL SUBMITTAL - LIC-01-0027)
14	5.18.c	<p>Changed reference from "the Quality Assurance Program" which was requested in LIC-01-0027, to "Technical Specification 5.8.2." This change requires the reference to TS 5.8.3 to be corrected to account for renumbering noted above in change 9.</p> <p>Justification: As the entire Section 5.8 is not being relocated to the FCS Quality Assurance Program (QAP), it is no longer necessary to reference the FCS QAP. Corrected reference to TS 5.8.3 to account for renumbering noted above in change 9. Thus, the only change is 5.8.3 becomes 5.8.2. This change is administrative. (Editorial)</p>

Attachment

Technical Specifications Markup

Legend

 Added

Deleted

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization (Continued)

- b. An Operator or Technician qualified in Radiation Protection Procedures shall be onsite when fuel is in the reactor.
- c. All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during the operation.
- d. Fire protection program responsibilities are assigned to those positions and/or groups designated by asterisks in USAR 12.1-1 through 12.1-4 according to the procedures specified in Section 5.8 of the Technical Specifications.
- e. Administrative procedures shall be developed and implemented to limit the working hours of plant staff who perform safety-related functions. Administrative procedures shall reflect the personnel whose working hours will be affected. Shift coverage shall be maintained without routine heavy use of overtime.

Deviations from the guidelines shall be authorized in advance by the ~~Department Manager~~ ~~department manager~~, ~~plant manager~~ ~~Manager - Fort Calhoun Station~~, or their designated alternates, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Routine deviation from the administrative guidelines shall not be authorized.

Controls shall be included in the procedures such that individual overtime shall be reviewed ~~monthly~~ ~~periodically~~ by the ~~Department Manager~~ ~~department manager~~, ~~plant manager~~ ~~Manager - Fort Calhoun Station~~, or their designated alternates, or higher levels of management, to ensure that excessive hours have not been assigned.

- f. The ~~Supervisor - Manager - Shift Operations~~, the Shift Managers, and ~~the Control Room Supervisors~~ ~~Licensed Senior Operators~~ shall hold a senior reactor operator license. The Licensed Operators shall hold a reactor operator license.

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

5.6 Reportable Event Action

5.6.1 The following actions shall be taken in the event of a REPORTABLE EVENT:

- a. The Commission shall be notified pursuant to the requirements of 10 CFR 50.72, if applicable.
- b. Each Reportable Event shall be reviewed by the Plant Review Committee and submitted to the Chairperson of the Safety Audit and Review Committee and the ~~Vice President corporate officer responsible for overall plant nuclear safety.~~
- c. Submit reports of Reportable Events pursuant to the requirements of Specification 5.9.2.

5.7 Safety Limit Violation

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

- a. The unit shall be placed in at least HOT SHUTDOWN within 1 hour.
- b. The Safety Limit Violations shall be reported to the ~~Vice President corporate officer responsible for overall plant nuclear safety~~ and the Chairperson of the Safety Audit and Review Committee (SARC) within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Review Committee. 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 Chairperson of the Safety Audit and Review Committee and the ~~Vice President corporate officer responsible for overall plant nuclear safety~~ within 14 days of the violation.

5.8 Procedures

5.8.1 Written procedures and administrative policies shall be established, implemented and maintained covering the following activities: ~~that meet or exceed the minimum requirements of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33 except as provided in 5.8.2 and 5.8.3 below.~~

- a. ~~The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, 1978;~~
- b. ~~The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;~~
- c. ~~Fire Protection Program implementation; and~~
- d. ~~All programs specified in Specification 5.11 through 5.19.~~

5.8.2 ~~Each procedure of Specification 5.8.1, and changes thereto, and any other procedure or procedure change that the Manager - Fort Calhoun Station determines to affect nuclear safety, shall be reviewed and approved as described below, prior to implementation:~~

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

- ~~5.8.2.1 Each procedure, or change thereto, shall be reviewed by a Qualified Reviewer (QR) who is knowledgeable in the functional area affected but is not the individual preparer. The QR may be from the same line organization as the preparer. The QR shall render a determination in writing of whether or not cross-disciplinary review of a procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.~~
- ~~5.8.2.2 Each procedure, or change thereto, shall be reviewed by the Department Head designated by Administrative Controls Standing Orders as the responsible Department Head for that procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the procedure, or change thereto, shall be approved by the responsible Department Head or the Manager-Fort Calhoun Station, prior to implementation. Administrative Controls Standing Orders, and the Fire Protection Program Plan shall be reviewed in accordance with Specification 5.5.1.6 and approved by the Manager-Fort Calhoun Station.~~
- ~~5.8.2.3 If the responsible Department Head determines that a procedure, or change thereto, requires a 10 CFR 50.59 safety evaluation, the responsible Department Head shall render a determination in writing of whether or not the procedure, or change thereto, involves an Unreviewed Safety Question (USQ) and shall forward the procedure, or change thereto with the associated safety evaluation to the PRC for review in accordance with Specification 5.5.1.6.a. If a USQ is involved, NRC approval is required prior to implementation of the procedure, or change.~~
- ~~5.8.2.4 Qualified Reviewers shall meet or exceed the respective qualifications for either Supervisors Requiring an AEC License, Professional-Technical Personnel, or Technical Support Personnel, as specified in ANSI N18.1 - 1971. Personnel recommended to be QRs shall be reviewed by the PRC and approved and designated as such by the PRC Chairman. The responsible Department Head shall ensure that a sufficient complement of QRs for their functional area is maintained in accordance with Administrative Controls Standing Orders.~~
- ~~5.8.2.5 Each procedure of Specification 5.8.1 shall be reviewed periodically as set forth in Administrative Controls Standing Orders.~~
- ~~5.8.2.6 Records documenting the activities performed under Specifications 5.8.2.1 through 5.8.2.4 shall be maintained in accordance with Specification 5.10.~~

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

- 5.8.32 Temporary changes to procedures of 5.8.1 above may be made provided:
- The intent of the original procedure is not altered.
 - The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License.
 - The change is documented, reviewed by a ~~Qualified Reviewer~~ qualified reviewer and approved by either the ~~plant manager~~ Manager—Fort Calhoun Station or the ~~Department Head~~ department head designated by Administrative Controls Standing Orders as the responsible ~~Department Head~~ department head for that procedure within 14 days of implementation.
- 5.8.43 Written procedures ~~approved per 5.8.2 above~~ shall be implemented which govern the selection of fuel assemblies to be placed in Region 2 of the spent fuel racks (Technical Specification 2.8). These procedures shall require an independent verification of initial enrichment requirements and fuel burnup calculations for a fuel bundle to assure the "acceptance" criteria for placement in Region 2 are met. This independent verification shall be performed by individuals or groups other than those who performed the initial acceptance criteria assessment, but who may be from the same organization.
- ~~5.8.5 Written procedures shall be established and maintained for implementation of the Fire Protection Program.~~

5.9 Reporting Requirements

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the ~~Director of the~~ appropriate ~~NRC~~ NRC Regional Office of ~~Inspection and Enforcement~~ unless otherwise noted.

5.9.1 Routine Reports

- Startup Report. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the USAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

5.17 Offsite Dose Calculation Manual (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by the ~~Quality Assurance Program. Specification 5.10.2.e.~~ This documentation shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the Plant Review Committee and the approval of the ~~plant manager Manager -- Fort Calhoun Station.~~
- c. Temporary changes to the ODCM may be made in accordance with Technical Specification 5.8.32.
- d. Shall be submitted to the Nuclear Regulatory Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed and shall indicate the date (e.g., month/year) the change was implemented.

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

5.18 Process Control Program (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by ~~the Quality Assurance Program. Specification 5.10.2.e.~~ This documentation shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change will maintain the overall conformance of the solidified waste program to existing requirements of federal, state, or other applicable regulations.
- b. Shall become effective after the review and acceptance by the Plant Review Committee and the approval of the ~~plant manager~~ ~~Manager - Fort Calhoun Station.~~
- c. Temporary changes to the PCP may be made in accordance with Technical Specification 5.8.32.
- d. Shall be submitted to the Nuclear Regulatory Commission in the form of a complete, legible copy of the entire PCP as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the PCP was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed and shall indicate the date (e.g., month/year) the change was implemented.

LIC-01-0081
Attachment 3

Attachment
Technical Specifications
Final Draft

TECHNICAL SPECIFICATIONS

5.0 **ADMINISTRATIVE CONTROLS**

5.2 Organization (Continued)

- b. An Operator or Technician qualified in Radiation Protection Procedures shall be onsite when fuel is in the reactor.
- c. All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during the operation.
- d. Fire protection program responsibilities are assigned to those positions and/or groups designated by asterisks in USAR 12.1-1 through 12.1-4 according to the procedures specified in Section 5.8 of the Technical Specifications.
- e. Administrative procedures shall be developed and implemented to limit the working hours of plant staff who perform safety-related functions. Administrative procedures shall reflect the personnel whose working hours will be affected. Shift coverage shall be maintained without routine heavy use of overtime.

Deviations from the guidelines shall be authorized in advance by the department manager, plant manager, or their designated alternates, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Routine deviation from the administrative guidelines shall not be authorized.

Controls shall be included in the procedures such that individual overtime shall be reviewed periodically by the department manager, plant manager, or their designated alternates, or higher levels of management, to ensure that excessive hours have not been assigned.

- f. The Manager - Shift Operations, the Shift Managers, and the Control Room Supervisors shall hold a senior reactor operator license. The Licensed Operators shall hold a reactor operator license.

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

5.6 Reportable Event Action

5.6.1 The following actions shall be taken in the event of a REPORTABLE EVENT:

- a. The Commission shall be notified pursuant to the requirements of 10 CFR 50.72, if applicable.
- b. Each Reportable Event shall be reviewed by the Plant Review Committee and submitted to the Chairperson of the Safety Audit and Review Committee and the corporate officer responsible for overall plant nuclear safety.
- c. Submit reports of Reportable Events pursuant to the requirements of Specification 5.9.2.

5.7 Safety Limit Violation

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

- a. The unit shall be placed in at least HOT SHUTDOWN within 1 hour.
- b. The Safety Limit Violations shall be reported to the corporate officer responsible for overall plant nuclear safety and the Chairperson of the Safety Audit and Review Committee (SARC) within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Review Committee. 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 Chairperson of the Safety Audit and Review Committee and the corporate officer responsible for overall plant nuclear safety within 14 days of the violation.

5.8 Procedures

5.8.1 Written procedures and administrative policies shall be established, implemented and maintained covering the following activities:

- a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
- c. Fire Protection Program implementation; and
- d. All programs specified in Specification 5.11 through 5.19.

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

- 5.8.2 Temporary changes to procedures of 5.8.1 above may be made provided:
- The intent of the original procedure is not altered.
 - The change is approved by two members of the plant supervisory staff, at least one of whom holds a Senior Reactor Operator's License.
 - The change is documented, reviewed by a qualified reviewer and approved by either the plant manager or the department head designated by Administrative Controls Standing Orders as the responsible department head for that procedure within 14 days of implementation.
- 5.8.3 Written procedures shall be implemented which govern the selection of fuel assemblies to be placed in Region 2 of the spent fuel racks (Technical Specification 2.8). These procedures shall require an independent verification of initial enrichment requirements and fuel burnup calculations for a fuel bundle to assure the "acceptance" criteria for placement in Region 2 are met. This independent verification shall be performed by individuals or groups other than those who performed the initial acceptance criteria assessment, but who may be from the same organization.

5.9 Reporting Requirements

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the appropriate NRC Regional Office unless otherwise noted.

5.9.1 Routine Reports

- Startup Report. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the USAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

TECHNICAL SPECIFICATIONS

5.0 **ADMINISTRATIVE CONTROLS**

5.17 Offsite Dose Calculation Manual (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program. This documentation shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the Plant Review Committee and the approval of the plant manager.
- c. Temporary changes to the ODCM may be made in accordance with Technical Specification 5.8.2.
- d. Shall be submitted to the Nuclear Regulatory Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed and shall indicate the date (e.g., month/year) the change was implemented.

TECHNICAL SPECIFICATIONS

5.0 **ADMINISTRATIVE CONTROLS**

5.18 Process Control Program (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program. This documentation shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change will maintain the overall conformance of the solidified waste program to existing requirements of federal, state, or other applicable regulations.
- b. Shall become effective after the review and acceptance by the Plant Review Committee and the approval of the plant manager.
- c. Temporary changes to the PCP may be made in accordance with Technical Specification 5.8.2.
- d. Shall be submitted to the Nuclear Regulatory Commission in the form of a complete, legible copy of the entire PCP as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the PCP was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed and shall indicate the date (e.g., month/year) the change was implemented.