Docket No. 50-341

Mr. B. Ralph Sylvia
Group Vice President - Nuclear
Operations
Detroit Edison Company
6400 North Dixie Highway
Newport, Michigan 48166

Dear Mr. Sylvia:

Subject: AMENDMENT NO. 11 TO FACILITY OPERATING LICENSE NO. NPF-43; ADMINISTRATIVE CONTROLS SECTION (TAC NO. 63123)

The Commission has issued the enclosed Amendment No. 11 to Facility Operating License No. NPF-43 for the Fermi-2 facility. This amendment consists of changes to the Plant Technical Specifications in response to your letter dated January 7, 1987 (VP-NO-87-0003), as supplemented March 6, 1987 (VP-NO-87-0044) and May 20, 1987 (NRC-87-0067).

The amendment revises the Administrative Controls Section of the Technical Specifications to change the titles of various organizations to more accurately reflect the current Fermi-2 organization, and to strengthen the responsibilities of the Onsite Review Organization.

A copy of the Safety Evaluation supporting this amendment is enclosed. Notice of Issuance will be included in the Commission's biweekly <u>Federal</u> <u>Register</u> notice.

Sincerely,

Original signed by

John J. Stefano, Project Manager Project Directorate III-1 Division Reactor Projects-III, IV, V & Special Projects

Enclosures:

1. Amendment No.11 to NPF-43

2. Safety Evaluation

cc w/enclosure: See next page	8710280162 PDR ADOCK P	871022 05000341 PDR	
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## Fermi-2 Facility

Mr. B. Ralph Sylvia Detroit Edison Company

cc:

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

## DETROIT EDISON COMPANY

WOLVERINE POWER SUPPLY COOPERATIVE, INCORPORATED

#### DOCKET NO. 50-341

## FERMI-2

## AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.11 License No. NPF-43

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Detroit Edison Company (the licensee) dated January 7, 1987, as supplemented March 6, 1987, and May 20, 1987, 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;
  - 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.
- 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 the Facility Operating License No. NPF-43 is hereby amended to read as follows:

#### Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No.11, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. DECo shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan. 3. This amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Martin J. Virgilio, Director Project Directorate III-1 Division of Reactor Projects-III, IV, V & Special Projects

Q.

Enclosure: Changes to the Technical Specifications

Date of Issuance: October 22, 1987

## ENCLOSURE TO LICENSE AMENDMENT NO.11

## FACILITY OPERATING LICENSE NO. NPF-43

## DOCKET NO. 50-341

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE	INSERT
xx	xx
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6-2	6-2
6-3	6-3
6-4	6-4
6-6	6-6
6-7	6-7
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#### 6.1 RESPONSIBILITY

6.1.1 The Plant 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 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-Nuclear Operations shall be reissued to all station personnel on an annual basis.

#### 6.2 ORGANIZATION

### OFFSITE

6.2.1 The offsite organization for unit management and technical support shall be as shown on Figure 6.2.1-1.

#### UNIT STAFF

6.2.2 The unit organization shall be as shown on Figure 6.2.2-1 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed 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 Operator shall be in the control room;
- c. A Health Physics Technician\* shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS **shall** be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site fire brigade of at least five members shall be maintained on site at all times\*. The fire brigade shall not include the Nuclear Shift Supervisor, the Shift Technical Advisor, nor the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency; and

<sup>\*</sup>The Health Physics Technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

## UNIT STAFF (Continued)

f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physics personnel, auxiliary operators, and key maintenance personnel).

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 Plant Manager or a Section Superintendent or the Radiation Protection Chemical Engineer, 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 Plant Manager or a Section Superintendent or the Radiation Protection Chemical Engineer to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

FERMI 1 UNIT

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Group Vice President Nuclear Safety Review Group Chairman Vice President Nuclear **Vice President** Director Nuclear Quality Nuclear Engineering & Services Operations Assurance Nuclear Engineering & Services Administrator Supervisor Ş Independent Safety Engineering Group Director Director Director Regulatory Atlairs Nuclear Nuclear Supervisor Engineering Services Procurement Quality Assurance Supervisor Quality General Supervisor Supervisor Nuclear Assurance Staff Nuclear Systems and Qualifications Staff Director Director Operator Training **Plant Manager** Licensing Engineering Nuclear Training-Nuclear Supervisor Production General Operational Supervisor Radiological Emergency Assurance General Supervisor Nuclear Group Leader Response Projects & Plant Engineering Preparedness Engineering Staff Staff Staff Quality Assurance Supervisor General Maintenance and Supervisor Nuclear Fuel **Modifications QA** Figure 6.2.1-1 Offsite Organization -----Interface Relationship

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FERMI - UNIT 2

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Amendment No.

11

## TABLE 6.2.2-1

#### MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQU	IRED TO FILL POSITION
	CONDITION 1, 2, or 3	CONDITION 4 or 5
NSS	1	1
NASS	1	None
NSO	2	1
NPPO/NAPPO	2	1
STA	1	None

#### TABLE NOTATION

NSS	-	luclear Shift Supervisor with a Senior Operator license
NASS	-	luclear Assistant Shift Supervisor with a Senior Operator
		icense
NSO	-	luclear Supervising Operator with an Operator license
NDDO	/NADDO	Walson Down Dlast Angentan on Nuclean Accistant Power Pl

NPPO/NAPPO - Nuclear Power Plant Operator or Nuclear Assistant Power Plant Operator

STA - Shift Technical Advisor

Except for the Nuclear Shift Supervisor, the shift crew composition may be one less than the minimum requirements of Table 6.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Nuclear Shift Supervisor from the control room while the unit is in OPERATIONAL CONDITION 1, 2 or 3, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Nuclear Shift Supervisor from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

FERMI - UNIT 2

## 6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

## FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving unit safety.

#### COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five dedicated, full-time engineers located onsite, each with a bachelor's degree in engineering or related science and at least two years professional level experience in his field, at least one year of which experience shall be in the nuclear field.

#### RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

#### AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the Group Vice President.

## 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Nuclear Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and **chal** have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

<sup>\*</sup>Not responsible for sign-off function.

## 6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the General Supervisor-Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 29, 1980 NRC letter to all licensees.

## - 6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Director(s), Nuclear Training, shall meet or exceed the requirements and recommendations of Section 5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 29, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

#### 6.5 REVIEW AND AUDIT

## 6.5.1 ONSITE REVIEW ORGANIZATION (OSRO)

#### FUNCTION

6.5.1.1 The OSRO shall function to advise the Plant Manager on all matters related to nuclear safety as described in Specification 6.5.1.6

### COMPOSITION

6.5.1.2 The OSRO shall be composed of the:

Chairman	Plant Manager
Vice-Chairman	Director, Plant Safety
Vice-Chairman	Assistant Director, Plant Safety
Member	Operations Engineer
Member	Technical Engineer 🖓
Member	Superintendent-Operations
Member	Radiation Protection Engineer
Member	Superintendent-Maintenance and Modifications
Member	Reactor Engineer

## ALTERNATES

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

## MEETING FREQUENCY

6.5.1.4 The OSRO shall meet at least once per calendar month and as convened by the OSRO Chairman or a Vice Chairman.

#### QUORUM

6.5.1.5 The quorum of the OSRO necessary for the performance of the OSRO responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or a Vice Chairman and four members including alternates.

## RESPONSIBILITIES

- 6.5.1.6 The OSRO shall be responsible for:
  - a. Review of all Plant Administrative Procedures and changes thereto;
  - 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. Review of the safety evaluations for plant procedures and changes thereto completed under the provisions of 10 CFR 50.59;
  - f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President-Nuclear Operations and to the Nuclear Safety Review Group;
  - g. Review of all REPORTABLE EVENTS;
  - h. Review of unit operations to detect potential hazards to nuclear safety;
  - i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Nuclear Safety Review Group;
  - j. Review of the Security Plan;
  - k. Review of the Emergency Plan;

#### **RESPONSIBILITIES** (Continued)

- 1. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President-Nuclear Operations and to the Nuclear Safety Review Group; and
- m. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and major modifications to the Radwaste Treatment Systems.

#### 6.5.1.7 The OSRO shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing to the Nuclear Safety Review Group with regard to whether or not each item considered under Specification 6.5.1.6a. through f. constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President-Nuclear Operations and the Nuclear Safety Review Group of disagreement between the OSRO and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

#### RECORDS

6.5.1.8 The OSRO shall maintain written minutes of each OSRO meeting that, at a minimum, document the results of all OSRO activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President-Nuclear Operations and the Nuclear Safety Review Group.

### 6.5.2 NUCLEAR SAFETY REVIEW GROUP (NSRG)

#### FUNCTION

6.5.2.1 The NSRG shall function to provide independent review and audit of designated activities in the areas of:

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- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological controls,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The NSRG shall report to and advise the Group Vice President on those areas of responsibility in Specifications 6.5.2.7 and 6.5.2.8.

FERMI - UNIT 2

Amendment No. 11

## COMPOSITION

6.5.2.2 The Group Vice President shall appoint at least nine members to the NSRG and shall designate from this membership a Chairman and at least one Vice Chairman. The membership shall collectively possess experience and competence to provide independent review and audit in the areas listed in Section 6.5.2.1. The Chairman and Vice Chairman shall have nuclear background in engineering or operations and shall be capable of determining when to call in experts to assist the NSRG review of complex problems. All members shall have at least a bachelor's degree in engineering or related sciences. The Chairman shall have at least 10 years of professional level management experience in the power field and each of the other members shall have at least 5 years of cumulative professional level experience in one or more of the fields listed in Section 6.5.2.1.

#### ALTERNATES

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

#### CONSULTANTS

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

#### MEETING FREQUENCY

6.5.2.5 The NSRG 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.

#### QUORUM

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

#### REVIEW

6.5.2.7 The NSRG shall be responsible for the review of 6.5.2.7.a and shall review 6.5.2.7.b through i:

- a. The safety evaluations for (1) changes to procedures, equipment, facilities or systems and (2) 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 which involve an unreviewed safety question as defined in 10 CFR 50.59;

#### **REVIEW** (Continued)

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the OSRO.

#### AUDITS

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

- a. The conformance of unit 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 unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit 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 fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation, at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least every third year;

AUDITS (Continued)

- g. Any other area of unit operation considered appropriate by the NSRG or the Group Vice President;
- h. The radiological environmental monitoring program and the results thereof at least once per 12 months;
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months; and
- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

#### RECORDS

6.5.2.9 Records of NSRG activities shall be prepared, approved, and distributed as indicated below:

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

## 6.5.3 TECHNICAL REVIEW AND CONTROL

## ACTIVITIES

6.5.3.1 Procedures required by Technical Specification 6.8, and other procedures which affect plant nuclear safety as determined by the Plant Manager, and changes thereto, shall be prepared by a qualified individual/ organization.

#### REVIEW

6.5.3.2 Each procedure or procedure change prepared in accordance with 6.5.3.1 above and not reviewed in accordance with Section 6.5.1.6 shall be reviewed for technical adequacy by a qualified individual other than the individual that prepared the procedure or change thereto. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review(s) shall be performed by personnel of the appropriate discipline.

6.5.3.3 Each procedure required by Specification 6.8.1.h through j, or changes thereto, shall be reviewed by the General Supervisor-Health Physics or designated alternate. The Environmental Program Coordinator will review any changes pertaining to 6.8.1.j. These reviews may be performed in lieu of, or in addition to, those required by item 6.5.3.2 above.

#### SAFETY EVALUATIONS

6.5.3.4 When required by 10 CFR 50.59, a safety evaluation to determine whether or not an unreviewed safety question is involved shall be included in the review. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to approval of the procedure or procedure change.

#### QUALIFICATIONS

6.5.3.5 Individuals performing the reviews and evaluations in accordance with 6.5.3.2 through 6.5.3.4 above shall meet or exceed the qualifications stated in Sections 4.2 or 4.4 of ANSI N18.1-1971 for the appropriate discipline, and shall be members of the plant staff previously designated in writing by the Plant Manager.

#### RECORDS

6.5.3.6 Written records of reviews and evaluations performed in accordance with items 6.5.3.2 through 6.5.3.4 above, including recommendations for approval or disapproval, shall be prepared and maintained.

#### 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 OSRO, and the results of this review shall be submitted to the NSRG and the Vice President-Nuclear Operations.

#### 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-Nuclear Operations and the NSRG shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the OSRO. 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 NSRG, and the Vice President-Nuclear Operations 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.
- b. The applicable procedures required to implement the Fermi 2 commitments made in response to the requirements of NUREG-0737.
- 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 environmental monitoring, using the guidance in Regulatory Guide 1.21 Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

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## PROCEDURES AND PROGRAMS (Continued)

6.8.2 Each plant administrative procedure, and changes thereto, shall be reviewed in accordance with Specification 6.5.1.6, and approved by the Plant Manager prior to implementation, and shall be reviewed periodically thereafter as set forth in administrative procedures.

6.8.3 Each plant procedure required by Specification 6.8.1, other than administrative procedures, and changes thereto, shall be reviewed in accordance with 6.5.3, and approved by the Plant Manager prior to implementation and shall be reviewed periodically thereafter as set forth in administrative procedures. The Plant Manager may delegate approval authority in writing for specific types of procedures to the Superintendent-Operations, the Superintendent-Maintenance and Modification, the Superintendent-Services, or the Radiation Protection-Chemical Engineer.

6.8.4 Temporary 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 Operator license on Fermi 2; and
- c. The change is documented, and reviewed and approved in accordance with either 6.8.2 or 6.8.3 above, as appropriate, within 14 days of implementation.

6.8.5 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, reactor water sampling, containment sampling, reactor water cleanup, combustible gas control, control rod drive discharge headers, and standby gas treatcant systems. The program shall include the following:

- 1. Preventive maintenance and periodic visual inspection requirements, and
- 2. Integrated leak test requirements 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:

PROCEDURES AND PROGRAMS (Continued)

- 1. Training of personnel,
- 2. Procedures for monitoring, and
- 3. Provisions for maintenance of sampling and analysis equipment.
- c. <u>Post-accident Sampling\*</u>

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.
- d. <u>High Density Spent Fuel Racks</u>

A program which will assure that any unanticipated degradation of the high density spent fuel racks will be detected and will not compromise the integrity of the racks.

## 6.9 REPORTING REQUIREMENTS

#### ROUTINE REPORTS

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

#### STARTUP REPORT

6.9.1.1 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 unit.

6.9.1.2 The startup report shall address each of the tests identified in Subsection 14.1.4.8 of the Final Safety Analysis Report and shall 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

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<sup>\*</sup>Not required until prior to exceeding 5% of RATED THERMAL POWER.

#### STARTUP REPORT (Continued)

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.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation) supplementary reports shall be submitted at least every 3 months until all three events have been completed.

#### ANNUAL REPORTS

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of plant, utility, and other personnel (including contractors) receiving exposures greater than 100 mrems/yr and their associated man-rem exposure according to work and job functions,\* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket or thermoluminescent dosimeters (TLD) dosimeters or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions; and
- b. Documentation of all challenges to main steam line safety/relief valves, and
- c. A summary of ECCS outage data including:
  - 1. ECCS outage dates and duration of outages,
  - 2. Cause of each ECCS outage,
  - 3. ECCS systems and components in the outage, and
  - 4. Corrective action taken.
- d. The reports shall also include the results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.5. The following information shall be included:

\*This tabulation supplements the requirements of \$20.407 of 10 CFR Part 20.

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## ANNUAL REPORTS (Continued)

- reactor power history starting 48 hours prior to the first sample in which the limit was exceeded;
- (2) results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis 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 and one other radioiodine isotope concentrations 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.

## MONTHLY OPERATING REPORTS

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

## ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.7 Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison as appropriate, with preoperational studies, with operational controls, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2. The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the Table and Figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with

#### ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT (Continued)

the report, the report shall be submitted noting and explaining the reasons for the missing results. If possible, the missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps\* covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.12.3; discussion of all deviations from the sampling schedule of Table 3.12.1-1; discussion of all analyses in which the LLD required by Table 4.12.1-1 was not achievable.

#### SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT\*\*

6.9.1.8 Routine Semiannual Radioactive Effluent 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 Semiannual 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 Semiannual 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 on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), 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

\*One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.

\*\*\*In lieu of submission with the first half year Semiannual Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.

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<sup>\*\*</sup>A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

# SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT (Continued)

and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY (Figure 5.1.3-1) 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 assessment of radiation doses shall be performed in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

The Semiannual Radioactive Effluent Release Report to be submitted 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 calendar year to show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM.

The Semiannual Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

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

The Semiannual Radioactive Effluent Release Reports shall include a list and  $q_{\rm e}$  description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Semiannual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

#### SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

## 6.10 RECORD RETENTION

6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

- 6.10.2 The following records shall be retained for at least 5 years:
  - a. Records and logs of unit operation covering time interval at each power level.
  - b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.
  - c. ALL REPORTABLE EVENTS.
  - d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.
  - e. Records of changes made to the procedures required by Specification 6.8.1.
  - f. Records of radioactive shipments.
  - g. Records of sealed source and fission detector leak tests and results.
  - h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7.1-1.

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## RECORD RETENTION (Continued)

- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the OSRO and the NSRG.
- 1. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.5 including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

## 6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

## 6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

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<sup>\*</sup>Health physics personnel or personnel escorted by health physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.

### HIGH RADIATION AREA (Continued)

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physicist in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose greater than 1000 mrems shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Nuclear Shift Supervisor on duty and/ or the health physic supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrems\* that are located within large areas. such as the containment, where no enclosure exists for purposes of locking. and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote (such as use of closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

## 6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

- 6.13.2 Licensee-initiated changes to the PCP:
  - a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
    - 1. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;

<sup>\*</sup>Measurement made at 18 inches from source of radioactivity.

## PROCESS CONTROL PROGRAM (PCP) (Continued)

- 2. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
- 3. Documentation of the fact that the change has been reviewed and found acceptable by the OSRO.
- b. Shall become effective upon review and acceptance by the OSRO.

## 6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

- 6.14.1 The ODCM shall be approved by the Commission prior to implementation.
- 6.14.2 Licensee-initiated changes to the ODCM:
  - a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
    - Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);
    - 2. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
    - 3. Documentation of the fact that the change has been reviewed and found acceptable by the OSRO.
  - b. Shall become effective upon review and acceptance by the OSRO.

## 6.15 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS, AND SOLID WASTE TREATMENT SYSTEMS\*

6.15.1 Licensee-initiated major changes to the radioactive waste systems (liquid, gaseous, and solid):

- a. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the OSRO. The discussion of each change shall contain:
  - 1. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59.

<sup>\*</sup>Licensees may choose to submit the information called for in this Specification as part of the annual FSAR update.

MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS (Continued)

- 2. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
- A detailed description of the equipment, components, and processes involved and the interfaces with other plant systems;
- 4. An evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
- 5. An evaluation of the change, which shows the expected maximum exposures to a MEMBER OF THE PUBLIC in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
- 6. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
- 7. An estimate of the exposure to plant operating personnel as a result of the change; and
- 8. Documentation of the fact that the change was reviewed and found acceptable by the OSRO.
- b. Shall become effective upon review and acceptance by the OSRO.

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

## SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

## SUPPORTING AMENDMENT NO. 11 TO FACILITY OPERATING LICENSE NO. NPF-43

## DETROIT EDISON COMPANY

#### WOLVERINE POWER SUPPLY COOPERATIVE, INCORPORATED

## FERMI-2

## DOCKET NO. 50-341

### 1.0 INTRODUCTION

By letter dated January 7, 1987, Detroit Edison Company (the licensee) requested changes to the Technical Specifications for Fermi-2. The request of January 7, 1987, has been supplemented by information provided in letters dated March 6, 1987, and May 20, 1987. The requested changes would revise the Administrative Controls Section of the Technical Specifications. The specific changes are described and evaluated below.

#### 2.0 EVALUATION

1. Figure 6.2.1-1 - Offsite Organization

The licensee has revised the offsite organization by establishing the position of Group Vice President to direct the nuclear operations organization. Reporting to the Group Vice President are the Vice President Nuclear Operations, Vice President Nuclear Engineering and Services, and Director Nuclear Quality Assurance. This organization is shown in proposed revised Figure 6.2.1-1.

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Reporting to the Vice President Nuclear Operations are the Plant Manager Nuclear Production, Director Nuclear Training General, and Director Operator Training. Reporting to the Vice President Nuclear Engineering and Services are the Director Regulatory Affairs, Director Nuclear Engineering, and Director Nuclear Services. Reporting to the Director Nuclear Quality Assurance is the quality assurance organization.

We have reviewed this requested change and find it acceptable as it meets the acceptance criteria set forth in Section 13.1 of NUREG-0800, the Standard Review Plan.

## 2. Figure 6.2.2-1 - Unit Organization

The licensee has revised the unit organization under the Plant Manager, Nuclear Production who reports to the Vice President Nuclear Operations. Reporting to the Plant Manager, Nuclear Production are the Superintendent Services, Radiation Protection Engineer, Superintendent Operations, Superintendent Maintenance and Modification, and Technical Engineer. The former positions of Assistant Manager Nuclear Production, Assistant to the Superintendent, Radiation Protection - Chemical Engineer, Reactor Engineer and Nuclear Fuel Handling Supervisor have been deleted. The new positions of Plant Manager, Nuclear Production, Superintendent Services, Radiation Protection Engineer, Operations Support Engineer, General Supervisor Radwaste, and General Supervisor Chemistry have been established. The revised organization is shown in proposed revised Figure 6.2.2-1.

We find this revised organization acceptable as it retains the necessary support for plant operations and meets the acceptance criteria set forth in Section 13.1.2-13.1.3 of NUREG-0800.

3. Section 6.5.1.6 - Onsite Review Organization (OSRO) Responsibilities

The licensee has proposed revisions to the responsibilities of the OSRO. Item a, Section 6.5.1.6, which requires the OSRO to review all procedures required by Specification 6.8 and changes thereto, would be deleted and replaced by the requirement that the OSRO review all plant administrative procedures and changes thereto. A new section would be added that requires the OSRO to review the safety evaluation for plant procedures and changes thereto completed under the provisions of 10 CFR 50.59 The licensee proposes adding a new Section 6.8.3 which would provide for the review of procedures other than plant administrative procedures.

We find the requested change acceptable as the review of plant procedures is not deleted (see Section 5.3), and the review of administrative procedures meets the acceptance criteria set forth in Section 13.5.1 of NUREG-0800.

4. Section 6.5.3 - Technical Review and Control

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The licensee has established a program that requires the procedures required by Technical Specification 6.8, except for administrative procedures (see 3. above) to be independently reviewed by qualified individuals prior to implementation.

The NRC staff initially found the provisions for the review of procedures acceptable except for qualifications of individuals who will perform the reviews and evaluations, in that the licensee stated that the individuals shall meet or exceed the qualifications stated in Sections 4.3 or 4.4 of ANSI N18.1-1971 for the appropriate discipline. It was the staff's position that individuals shall meet or exceed the qualifications stated in Sections 4.2 or 4.4 of ANSI N18.1-1971 for the appropriate discipline. In a telecon with the licensee on August 14, 1987, it was determined that reference to Section 4.3 of ANSI N18.1-1971 was a typographical error. The correct reference should be 4.2 or 4.4 of that Standard.

5. Sections 6.8.2, 6.8.3, and 6.8.4 (Procedural Programs)

- a. Section 6.8.2 This section would be changed to delete the requirement that each procedure required by Section 6.8.1 shall be reviewed by the OSRO and approved by the Assistant Manager Nuclear. The revised Section 6.8.2 would require that each plant administrative procedure shall be reviewed in accordance with Specification 6.5.1.6 and approved by the Plant Manager.
- b. Section 6.8.3 The current Section 6.8.3 that has requirements with respect to temporary changes to procedures would be renumbered Section 6.8.4. A new Section 6.8.3 would be added that requires each plant procedure required by Specification 6.8.1, other than administrative procedures, shall be reviewed in accordance with Section 6.5.3 and approved by the Plant Manager or other specifically designated individuals.
- c. Section 6.8.4 (formerly Section 6.8.3) The requirement that temporary changes to procedures shall be reviewed by the OSRO and approved by the Assistant Manager - Nuclear Production would be deleted. A new requirement would be added that requires the change to be reviewed and approved in accordance with either Section 6.8.2 or 6.8.3 as appropriate.

We find these requested changes acceptable as they provide for the review and approval of plant procedures that meet the acceptance criteria set forth in Section 13.5.1 of NUREG-0800.

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6. The licensee has proposed numerous changes in titles throughout Section 6 to reflect the revised organization. Additionally, there have been several editorial changes.

We have reviewed these changes and find that they reflect the revised organization and/or are editorial corrections and are, therefore, acceptable.

## 3.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, this 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 this amendment.

## 4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors:

F. Allenspach, NRR J. Stefano, NRR

Dated: October 22, 1987

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